

No. 13-5272

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

LENEUOTI F. TUAUA, et al.,

Plaintiffs-Appellants,

v.

UNITED STATES OF AMERICA, et al.,

Defendants-Appellees.

On Appeal from the United States District Court for the District of Columbia

RESPONSE TO PETITION FOR REHEARING EN BANC

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INTRODUCTION AND SUMMARY

The Fourteenth Amendment’s Citizenship Clause provides that “[a]ll persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside.” U.S. Const. amend. XIV, § 1, cl. 1. A unanimous panel of this Court correctly held that the Citizenship Clause does not apply to individuals born in the unincorporated and outlying territory of American Samoa. That holding accords with Supreme Court precedent distinguishing unincorporated territories from “the United States” for purposes of determining the application of the Constitution, *see Downes v. Bidwell*, 182 U.S. 244 (1901), and with the decisions of other courts of appeals uniformly holding that the Citizenship Clause did not extend to pre-independence Philippines, and that the Naturalization Clause does not extend to the Northern Mariana Islands. And it is consistent with the longstanding practice by which acquisition of citizenship in territories such as Puerto Rico, Guam, and the United States Virgin Islands has been treated as a statutory, not a constitutional, right. Rehearing is not warranted.

BACKGROUND

A. The Samoan Islands are an archipelago located in the South Pacific between Hawaii and New Zealand. JA 10. American Samoa consists of the archipelago’s easternmost islands, which were acquired by the United States in 1900, after Great Britain and Germany entered into a treaty with the United States withdrawing their

claims to the islands, *see* Tripartite Convention of 1899, 31 Stat. 1878 (ratified Feb. 16, 1900), and Samoan leaders ceded sovereignty to the United States, *see* 48 U.S.C. §§ 1661, 1662. “American Samoan territory is partially self-governed, possessing a popularly elected bicameral legislature and similarly elected governor.” Op. 3. It is subject to oversight by the Secretary of the Interior, and prior to 1951 was subject to oversight by the Department of the Navy. *See* Exec. Order No. 10264, 16 Fed. Reg. 6417 (July 3, 1951); 48 U.S.C. § 1431 note. American Samoa is an “outlying possession[] of the United States.” 8 U.S.C. § 1101(a)(29). Accordingly, unless otherwise qualified for citizenship under 8 U.S.C. § 1401, individuals born there “shall be nationals, but not citizens, of the United States at birth.” 8 U.S.C. § 1408.

B. Plaintiffs are five non-citizen nationals born in American Samoa, and the Samoan Federation of America, a nonprofit organization serving the Samoan community in Los Angeles. JA 11-18. They claim that the individual plaintiffs’ designation as non-citizen nationals violates the Fourteenth Amendment’s Citizenship Clause. *See* U.S. Const. amend. XIV, § 1, cl. 1.

The district court granted the government’s motion to dismiss for failure to state a claim. JA 38-55. The court observed that American Samoa is an “unincorporated territor[y]” of the United States, because it “ha[s] not yet become part of the United States and [is] not on a path toward statehood.” JA 47. The court explained that “*no* federal court has recognized birthright citizenship as a guarantee in unincorporated territories.” JA 49. “To the contrary, the Supreme Court has

continued to suggest that citizenship is not guaranteed to people born in unincorporated territories.” *Id.* (citing *Barber v. Gonzales*, 347 U.S. 637, 639 n.1 (1954); *Miller v. Albright*, 523 U.S. 420, 467 n.2 (1998) (Ginsburg, J., dissenting)). And “the Second, Third, Fifth, and Ninth Circuits have held that the term ‘United States’ in the Citizenship Clause did not include the Philippines during its time as an unincorporated territory.” JA 50 (citing *Nolos v. Holder*, 611 F.3d 279 (5th Cir. 2010); *Valmonte v. INS*, 136 F.3d 914 (2d Cir. 1998); *Lacap v. INS*, 138 F.3d 518 (3d Cir. 1998); *Rabang v. INS*, 35 F.3d 1449 (9th Cir. 1994)).

The court found unpersuasive plaintiffs’ reliance on *King v. Morton*, 520 F.2d 1140 (D.C. Cir. 1975), which “addressed whether an American citizen was guaranteed the right to trial by jury in American Samoa,” “not the right of persons born in American Samoa to citizenship itself.” JA 51-52. The court noted “the years of past practice in which territorial citizenship has been treated as a statutory, and not a constitutional, right,” JA 53-54, and concluded that “Congress has not seen fit to bestow birthright citizenship upon American Samoa, and in accordance with the law, this Court must and will respect that choice.” *Id.*

C. A unanimous panel of this Court affirmed. The panel first determined that the Citizenship Clause’s “text and structure alone are insufficient to divine [its] geographic scope,” because they “are silent as to the precise contours of the ‘United States’ under the Citizenship Clause.” Op. 6. The panel rejected plaintiffs’ reliance “on scattered statements from the legislative history,” noting that such “[i]solated

statements . . . are not impressive legislative history.” Op. 7 (quoting *Garcia v. United States*, 469 U.S. 70, 78 (1984)). The panel found similarly unpersuasive plaintiffs’ reliance on *United States v. Wong Kim Ark*, 169 U.S. 649, 654 (1898), in which the petitioner had been born in California and the undisputed “fact that he had been born ‘within the territory’ of the United States . . . made it unnecessary to define ‘territory’ rigorously or decide whether ‘territory’ in its broader sense meant ‘in the United States’ under the Citizenship Clause.” Op. 9 (quoting *Rabang*, 35 F.3d at 1454).

Like the district court, the panel looked to “[t]he doctrine of ‘territorial incorporation’ announced in the Insular Cases,” which “distinguishes between incorporated territories, which are intended for statehood from the time of acquisition and in which the entire Constitution applies *ex proprio vigore*, and unincorporated territories [such as American Samoa], which are not intended for statehood and in which only [certain] fundamental constitutional rights apply by their own force.” Op. 12 (quoting *Commonwealth of N. Mariana Islands v. Atalig*, 723 F.2d 682, 688 (9th Cir. 1984)). The panel noted the decisions of courts of appeals uniformly holding that the Citizenship Clause did not extend to the Philippines when it was an unincorporated territory, Op. 9, and concluded that “there is no material distinction between nationals born in American Samoa and those born in the Philippines prior to its independence in 1946,” Op. 9 n.6. Like the district court, it also noted the “years of past practice in which territorial citizenship has been treated as a statutory, and not a constitutional right,” Op. 14 n.7 (internal quotation marks omitted), and observed that this

uninterrupted history “is not something to be lightly case aside,” *id.* (quoting *Walz v. Tax Comm’n of City of New York*, 397 U.S. 664, 678 (1970)).

The panel rejected plaintiffs’ claim that birthright citizenship is a “fundamental right” that automatically extends to “persons born in United States’ unincorporated territories.” Op. 14. Rather, it recognized that the term “[f]undamental’ has a distinct and narrow meaning in the context of territorial rights,” Op. 15, and that extending birthright citizenship anywhere the United States exerts sovereignty would contravene democratic determination of the relationship between territories and the United States, Op. 16-17. It also observed that “the American Samoan people have not formed a collective consensus in favor of United States citizenship,” and their elected leaders have expressed “concern that the extension of United States citizenship to the territory could potentially undermine [traditional] aspects of the Samoan way of life.” Op. 18. The panel concluded that it would be “anomalous to impose citizenship over the objections of the American Samoan people themselves, as expressed through their democratically elected representatives.” Op. 19.

DISCUSSION

A. The Fourteenth Amendment’s Citizenship Clause provides that “[a]ll persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside.” U.S. Const. amend. XIV, § 1, cl. 1. Like the panel in this case, every other court of appeals to consider the issue has held that the Citizenship Clause does not apply to

unincorporated territories of the United States. *See Valmonte v. INS*, 136 F.3d 914 (2d Cir. 1998) (holding that the Citizenship Clause does not apply to individuals born in the Philippines prior to its independence); *Lacap v. INS*, 138 F.3d 518 (3d Cir. 1998) (same); *Nolos v. Holder*, 611 F.3d 279 (5th Cir. 2010) (same); *Rabang v. INS*, 35 F.3d 1449 (9th Cir. 1994) (same); *see also Eche v. Holder*, 694 F.3d 1026, 1027-28 (9th Cir. 2012) (holding that the Naturalization Clause does not apply to the Northern Mariana Islands, because they are an unincorporated territory of the United States).

That interpretation of the Citizenship Clause flows directly from the Supreme Court's *Insular Cases*, a series of decisions that addressed the Constitution's application to noncontiguous territories acquired at the turn of the 20th century, such as Puerto Rico, Guam, and the Philippines. *See Boumediene v. Bush*, 553 U.S. 723, 756-57 (2008) (citing *De Lima v. Bidwell*, 182 U.S. 1 (1901); *Dooley v. United States*, 182 U.S. 222 (1901); *Armstrong v. United States*, 182 U.S. 243 (1901); *Downes v. Bidwell*, 182 U.S. 244 (1901); *Hawaii v. Mankichi*, 190 U.S. 197 (1903); *Dorr v. United States*, 195 U.S. 138 (1904)). In those cases, the Supreme Court held that the Constitution has more limited application in "unincorporated Territories" not intended for statehood, than it does in States and "incorporated Territories surely destined for statehood." *Boumediene*, 553 U.S. at 757. The Court developed a framework for determining the application in unincorporated territories of constitutional provisions that lack an express geographic scope, such as the Sixth Amendment's right to trial by jury. *See, e.g., Dorr*, 195 U.S. at 144-49. It also interpreted constitutional provisions that expressly define their

geographic reach, to determine if they apply in unincorporated territories.

In one such case, *Downes v. Bidwell*, the Supreme Court held that the unincorporated territory of Puerto Rico was “not a part of the United States within the revenue clauses of the Constitution.” 182 U.S. at 287. In concurring opinions, Justices Brown and White compared the revenue clauses’ requirement that “all Duties . . . shall be uniform throughout the United States,” Art. 1, § 8, with the Thirteenth Amendment’s prohibition on slavery “within the United States, or any place subject to their jurisdiction,” U.S. Const. amend. XIII, § 1. The justices explained that the Thirteen Amendment’s broader language demonstrates “there may be places subject to the jurisdiction of the United States, but which are not incorporated into it, and hence are not within the United States in the completest sense of those words.” *Downes*, 182 U.S. at 336 -37 (White, J., concurring); *see also id.* at 251 (Brown, J., concurring) (“[T]here may be places within the jurisdiction of the United States that are no part of the Union.”). The justices recounted the nation’s territorial acquisitions dating back to the Louisiana Purchase in 1803, and noted that such acquisitions historically included terms addressing the degree to which new territories would be incorporated into the United States. *See id.* at 251-57 (Brown, J., concurring); *id.* at 303-07, 318-33 (White, J., concurring). And they explained that Congress’s “power to acquire territory by treaty implies, not only the power to govern such territory, but to prescribe upon what terms the United States will receive its inhabitants.” *Id.* at 279 (Brown, J., concurring); *see also id.* at 306 (White, J., concurring) (“The general

principle of the law of nations, already stated, is that acquired territory, in the absence of agreement to the contrary, will bear such relation to the acquiring government as may be by it determined.”).

The treaty by which Puerto Rico was acquired did “not stipulate for incorporation,” but rather its “express purpose . . . was not only to leave the status of the territory to be determined by Congress, but to prevent the treaty from operating to the contrary.” *Downes*, 182 U.S. at 340 (White, J., concurring). The Supreme Court concluded that, “while in an international sense Porto Rico was not a foreign country, since it was subject to the sovereignty of and was owned by the United States,” it was not part of the “United States” for purposes of the revenue clauses of the Constitution. *Id.* at 341-42 (White, J., concurring); *id.* at 263 (Brown, J., concurring) (“[I]n dealing with foreign sovereignties, the term ‘United States’ has a broader meaning than when used in the Constitution, and includes all territories subject to the jurisdiction of the Federal government.”); *id.* at 346 (Gray, J., concurring) (“So long as Congress has not incorporated the territory into the United States, neither military occupation nor cession by treaty makes the conquered territory domestic territory, in the sense of the revenue laws; but those laws concerning ‘foreign countries’ remain applicable to the conquered territory until changed by Congress.”).¹

¹ Plaintiffs discount *Downes* because multiple opinions were authored by the majority, Appellant’s Br. 41-44; Pet. at 8, but even the dissent in *Downes* recognized that the majority all concurred “in the view that Porto Rico belongs to the United

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Relying on that reasoning, the Second, Third, Fifth, and Ninth Circuits have held that “persons born in the Philippines during its status as a United States territory were not ‘born . . . in the United States’ under the Fourteenth Amendment[’s]” Citizenship Clause. *Nolos*, 611 F.3d at 284 (5th Cir.) (quoting *Valmonte*, 136 F.3d at 920 (2d Cir.) (in turn quoting *Rabang*, 35 F.3d at 1453 (9th Cir.))); *see also* *Lacap*, 138 F.3d at 518 (3d Cir.) (same). While it has not had occasion to address the issue directly, the Supreme Court has assumed the same. *See Barber v. Gonzalez*, 347 U.S. 637, 639 n.1 (1954); *Miller v. Albright*, 523 U.S. 420, 467 n.2 (1998) (Ginsburg, J., dissenting); *see also Rabang v. Boyd*, 353 U.S. 427, 430 (1957) (reiterating Congress’s power to “prescribe upon what terms the United States will receive [a territory’s] inhabitants and what their status shall be” (citing *Downes*, 182 U.S. at 279)). And the Ninth Circuit has held that the Naturalization Clause does not extend to the Northern Mariana Islands, because “[t]he Naturalization Clause has a geographic limitation: it applies ‘throughout the United States,’” and “federal courts have repeatedly construed similar and even identical language in other clauses to include states and incorporated territories, but not unincorporated territories.” *Eche*, 694 F.3d at 1030-31.

Plaintiffs do not dispute that American Samoa is an unincorporated territory,

States, but nevertheless, and notwithstanding the act of Congress, is not a part of the United States subject to the provisions of the Constitution in respect of the levy of taxes, duties, imposts, and excises.” 182 U.S. at 347 (Fuller, J., dissenting); *see also Balzac v. Porto Rico*, 258 U.S. 298, 305 (1922) (noting that “the opinion of Mr. Justice White of the majority, in *Downes v. Bidwell*, has become the settled law of the court”).

and their attempts to distinguish American Samoa from pre-independence Philippines are unavailing. Plaintiffs emphasize that the Philippines “were acquired by conquest,” whereas American Samoa was acquired through “mutual and voluntary agreement.” Appellants’ Br. 42-43. But the Supreme Court made clear that Congress has equal authority in either circumstance. *See Downes*, 182 U.S. at 300 (White, J., concurring) (“[W]herever a government acquires territory as a result of any of the modes above stated, the relation of the territory to the new government is to be determined by the acquiring power in the absence of stipulations upon the subject.”). Plaintiffs also note that the Philippines “achieved independence in 1946,” Appellants’ Br. 44, but do not explain why that is relevant to the Constitution’s application there while it was still an unincorporated territory. Finally, plaintiffs urge that the United States “never intended to hold [the Philippines] permanently,” Appellants’ Br. 43, but Congress did not establish a timeline for the Philippine’s independence until 35 years after its acquisition, *Rabang*, 35 F.3d at 1450-51, and no court of appeals relied on that fact in holding the Citizenship Clause did not extend there while it was a territory, *see id.* at 1452; *Nolos*, 611 F.3d at 282-84; *Valmonte*, 136 F.3d at 917-21; *Lacap*, 138 F.3d at 518.

Plaintiffs’ reliance on *United States v. Wong Kim Ark*, 169 U.S. 649 (1898) is misplaced for the reasons set forth in the panel’s decision. In that case, the Supreme Court held the Citizenship Clause applied to a child born in the United States, who had been denied citizenship because his parents were citizens of China. *Id.* at 705 (describing the “single question” in the case to be “whether a child born in the United

States, of parents . . . who . . . are subjects of the emperor of China, . . . becomes at the time of his birth a citizen of the United States”). As the panel explained, it was undisputed in *Wong Kim Ark* that the plaintiff was born in the State of California, and therefore within the United States. Op. 9. It was “unnecessary to define ‘territory’ rigorously or decide whether ‘territory’ in its broader sense meant ‘in the United States’ under the Citizenship Clause.” Op. 9 (quoting *Rabang*, 35 F.3d at 1454). “This point is well illustrated by the Court’s ambiguous pronouncements on the territorial scope of common law citizenship.” *Valmonte*, 136 F.3d at 920 n.10. While the Supreme Court suggested at times that “birth within the realm gives the rights of a native-born citizen,” *Wong Kim Ark*, 169 U.S. at 666, it also explained that “every child born *in England* of alien parents was a natural-born subject,” *id.* at 658 (emphasis added), and that “[t]he right of citizenship . . . is incident to birth *in the country*,” *id.* at 665 (emphasis added). Accordingly, courts have declined to “construe the Court’s statements” in *Wong Kim Ark* “as establishing the citizenship principle that a person born in the outlying territories of the United States is a United States citizen under the Fourteenth Amendment.” *Valmonte*, 136 F.3d at 920.

Plaintiffs also find no support in the statements of individual legislators at the time of the Fourteenth Amendment’s ratification. As the panel explained, the Fourteenth Amendment’s legislative history “contains many statements from which conflicting inferences can be drawn,” Op. 7 (quoting *Afroyim v. Rusk*, 387 U.S. 253, 267 (1967)) and the “scattered statements” on which plaintiffs rely “are not

impressive legislative history,” *id.* (quoting *Garcia v. United States*, 469 U.S. 70, 78 (1984)). In any event, at most, the statements cited by plaintiffs would support interpreting the Citizenship Clause to apply to *incorporated* territories and the States. Plaintiffs identify nothing in the legislative history addressing application of the Citizenship Clause to outlying territories such as those acquired at the turn of the 20th century and addressed in the Supreme Court’s *Insular Cases*.²

Indeed, as the panel recognized, plaintiffs’ position is contrary to the “years of past practice” in which citizenship in unincorporated territories “has been treated as a statutory, and not a constitutional right.” Op. 14 n.7 (internal quotation marks omitted). For example, Puerto Rico, Guam, and the Philippines were acquired by the United States in 1899, *see* Treaty of Paris, art. 2, 30 Stat. 1754, 1755 (ratified Apr. 11, 1899), but Congress did not fully extend citizenship based on birth in Puerto Rico until 1940, *see* Nationality Act of 1940, § 202, 54 Stat. 1137, 1139; *see also* 8 U.S.C. § 1402, or in Guam until 1950, *see* 48 U.S.C. § 1421; 8 U.S.C. § 1407. Congress never did so in the Philippines, instead designating individuals born there United States

² For the same reason, plaintiffs’ reliance on dicta in the *Slaughter-House Cases*, 83 U.S. 36 (1872), is misplaced. *See* Pet. 4. As in *Wong Kim Ark*, the Court in that case did not purport to answer the geographic scope of the Citizenship Clause. In any event, its reference to those born “in the District of Columbia or in the Territories,” 83 U.S. at 72-73, did not encompass individuals born in noncontiguous and unincorporated territories acquired nearly thirty years later. *Cf. Downes*, 182 U.S. at 260-61 (Brown, J., concurring) (noting that, prior to being ceded to the federal government, the District of Columbia “had been a part of the states of Maryland and Virginia,” and therefore the “Constitution had attached to it irrevocably”).

nationals. *See Barber*, 347 U.S. at 639 n.1. Similarly, the United States Virgin Islands were acquired in 1917, but Congress did not extend citizenship based on birth there until 1927, and even then imposed conditions. *See Act of February 25, 1927*, 44 Stat. 1234. And the United States acquired the Panama Canal in 1904, but Congress did not address citizenship based on birth there until 1937, and never fully extended citizenship to all individuals born in the Canal Zone. *See Act of August 4, 1937*, § 1, 50 Stat. 558. As the panel recognized, this “unbroken practice . . . openly [conducted] . . . by affirmative state action . . . is not something to be lightly cast aside.” Op. 14 n.7 (quoting *Walz v. Tax Comm’n of City of New York*, 397 U.S. 664, 678 (1970)).

B. The panel’s decision does not conflict with *King v. Morton*, 520 F.2d 1140 (D.C. Cir. 1975). *King* addressed whether a United States citizen was guaranteed the right to a trial by jury in American Samoa and not the right of persons born in American Samoa to citizenship itself. JA 51-52. It did not involve a provision of the Constitution, like the Citizenship Clause, that expressly defines its geographic reach. Because American Samoa is not “in the United States” for purposes of the Fourteenth Amendment, further examination of the *Insular Cases* framework is unnecessary. *See Rabang*, 35 F.3d at 1453 n.8 (noting “the territorial scope of the phrase ‘the United States’ is a distinct inquiry from whether a constitutional provision should extend to a territory, and we rely on the *Insular Cases* only to determine the meaning of the phrase ‘in the United States’” (internal citation omitted)).

In any event, the panel correctly held that birthright citizenship in an

unincorporated territory is not a “fundamental right” for purposes of the *Insular Cases* framework. As the panel explained, “[f]undamental’ has a distinct and narrow meaning in the context of territorial rights.” Op. 15. In claiming that birthright citizenship should be deemed a “fundamental right,” plaintiffs rely on decisions striking down statutes that would have expatriated individuals already deemed United States citizens. *See* Pet. 7; Appellants’ Br. 49-50. But even if those cases had addressed the right to citizenship at birth, this Court explained in *King* that labeling a right “fundamental” in one context does not automatically render the right “fundamental” in the territorial context. *See* 520 F.2d at 1147 (recognizing distinction between fundamental rights “in states rather than unincorporated territories”); *see also* *Commonwealth of the N. Mariana Islands v. Atalig*, 723 F.2d 682, 689 (9th Cir. 1984) (observing that “the doctrine of incorporation for purposes of applying the Bill of Rights to the states serves one end while the doctrine of territorial incorporation serves a related but distinctly different one.”).

Declaring birthright citizenship a fundamental right that applies anywhere the United States exerts sovereignty would be contrary to the language of the Citizenship Clause, longstanding practice, and Congress’s recognized authority to determine the terms of acquisition of territories. *See supra* Part A.³ It also would be inconsistent

³ Indeed, the majority in *Downes* recognized that birthright citizenship was not a fundamental right that applies automatically upon acquisition by the United States. *See* 182 U.S. at 280 (Brown, J., concurring) (recounting history of acquisitions in which

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with the *Insular Cases* framework itself, which relies on citizenship as one factor in determining the application of other constitutional provisions in unincorporated territories. *See, e.g., Boumediene*, 553 U.S. at 766 (holding that citizenship is one of the “factors . . . relevant in determining the reach of the Suspension Clause”).

The panel also appropriately found that application of the Citizenship Clause to American Samoa would be anomalous. Extending birthright citizenship by judicial fiat to unincorporated territories would contravene Congress’s authority to define the relationship between such territories and the United States. And the panel correctly recognized that it would be “anomalous to impose citizenship over the objections of the American Samoan people themselves, as expressed through their democratically elected representatives.” *Op.* 19; *see also id.* at 21-22 (“We can envision little that is more anomalous, under modern standards, than the forcible imposition of citizenship against the majoritarian will.”).

CONCLUSION

For the foregoing reasons, the petition for rehearing en banc should be denied.

“there is an implied denial of the right of the inhabitants to American citizenship until Congress by further action shall signify its assent thereto”); *id.* at 306 (White, J., concurring) (“To concede to the government of the United States the right to acquire, and to strip it of all power to protect the birthright of its own citizens and to provide for the well being of the acquired territory by such enactments as may in view of its condition be essential, is, in effect, to say that the United States is helpless in the family of nations, and does not possess that authority which has at all times been treated as an incident of the right to acquire.”)

Respectfully submitted,

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SEPTEMBER 2015

**CERTIFICATE OF COMPLIANCE WITH
FEDERAL RULE OF APPELLATE PROCEDURE 32(a)**

I hereby certify that this brief complies with the requirements of Fed. R. App. P. 32(a)(5) and (6) because it has been prepared in 14-point Garamond, a proportionally spaced font. I further certify that this response complies with the requirements of Fed. R. App. P. 35(b)(2) because it has been prepared in 14-point Garamond, a proportionally spaced font, and does not exceed 15 pages, excluding material not counted under Rule 32.

/s/ Patrick G. Nemeroff

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2015, I electronically filed the foregoing brief with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the appellate CM/ECF system.

/s/ Patrick G. Nemeroff

Patrick G. Nemeroff