Case No. 25-1300

UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT

Christopher Kohls and Mary Franson,

Plaintiffs-Appellants,

v.

Keith M. Ellison, in his official capacity as Attorney General of Minnesota;
Chad Larson, in his official capacity as County Attorney of Douglas County,

Defendants-Appellees.

On Appeal from the United States District Court for the District of Minnesota
No. 0:24-cv-03754
Honorable Laura M. Provinzino

UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF OF AMICI CURIAE SOUTHEASTERN LEGAL FOUNDATION AND LIBERTY JUSTICE CENTER SUPPORTING THE PETITION FOR REHEARING EN BANC

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Attorneys for Amici Curiae

Pursuant to Rule 29 of the Federal Rules of Appellate Procedure, Southeastern Legal Foundation and Liberty Justice Center (collectively Amici) hereby move this Court for an order allowing them to file the attached amicus curiae brief in support of Plaintiffs-Appellants Christopher Kohls and Mary Franson and in support of granting the petition for rehearing en banc. In support of this motion, Amici state:

MOVANT'S INTEREST

Southeastern Legal Foundation (SLF) is a national, nonprofit legal organization dedicated to rebuilding the American Republic by reclaiming civil liberties, protecting free speech, securing property rights, and restoring constitutional balance. Since 1976, SLF has advocated, both in and out of the courtroom, to protect our First Amendment rights.

The Liberty Justice Center is a nonprofit, nonpartisan public-interest litigation firm that pursues strategic, precedent-setting litigation aimed at revitalizing constitutional restraints on government power and protecting individual rights.

Amici file this brief because they are public interest law firms who frequently litigate in this Court and other federal courts around the United States to protect free speech under the First Amendment. Essential to a robust judicial enforcement of the First Amendment is a doctrine of constitutional standing that permits review before a litigant is "subject to . . . enforcement action." *Susan B. Anthony List v. Driehaus*, 573 U.S. 149, 159 (2014). But the instant case shows a trend toward *narrowing* state

law to avoid a constitutional conflict at the standing stage, instead of considering whether the law *arguably* proscribes intended speech. *Kohls v. Ellison*, 166 F.4th 728, 2026 LX 87005, at *5–6 (8th Cir. Feb. 9, 2026).

CONSENT OF THE PARTIES

All parties have consented to the filing of the proposed amicus brief.

REASONS FOR AND RELEVANCE OF AMICUS BRIEF

Amici are public interest law firms who frequently litigate in this Court and other federal courts around the United States to protect free speech under the First Amendment. Essential to a robust judicial enforcement of the First Amendment is a doctrine of constitutional standing that permits review before a litigant is "subject to . . . enforcement action." *Susan B. Anthony List*, 573 U.S. at 159. The Supreme Court has adopted a test for such cases. *See id.* Among other factors, the test requires that a litigant's speech be "arguably proscribed," not definitively proscribed. *Id.* at 162.

Immediately after the Supreme Court decided *Susan B. Anthony List*, this Court faithfully followed it. *281 Care Comm. v. Arneson*, 766 F.3d 774 (8th Cir. 2014). The Court rejected the government's attempt to narrow the scope of the law (in court) to avoid judicial review. Instead, the Court focused on how prosecuting parties "could" take action against the plaintiffs' speech. *Id.* at 782.

But the instant case shows a trend toward narrowing state law to avoid a constitutional conflict, in this case by holding that the law does not criminalize constitutional parody despite no written parody exception. *Kohls*, 2026 LX 87005, at *5–6. In another recent case, then-Chief Judge Smith noted this Court's apparent slide away from the Supreme Court's prevailing standing analysis. *See Christian Action League v. Freeman*, 31 F.4th 1068, 1075–76 (8th Cir. 2022) (Smith, C.J., dissenting).

Amici view this trend as inconsistent with the Supreme Court's standing jurisprudence, which makes en banc review appropriate. Amici also see in this trend a subtle departure from a textualist method of statutory interpretation. Amici believe it is especially important for courts to refrain from employing substantive canons of construction to narrow statutes when considering standing in First Amendment pre-enforcement challenges. The proposed amicus brief is desirable because it discusses these important issues for the Court's consideration.

CONCLUSION

Amici therefore move the Court for leave to file the enclosed amicus brief supporting Plaintiffs-Appellants and a grant of rehearing en banc.

Dated: March 16, 2026

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CERTIFICATE OF SERVICE

In accordance with Fed. R. App. P. 25, I hereby certify that I electronically filed this motion with the Clerk of Court for the United States Court of Appeals for the Eighth Circuit by using the CM/ECF system on March 16, 2026. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: March 16, 2026

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CORPORATE DISCLOSURE STATEMENT[1]

Southeastern Legal Foundation (SLF) is a Georgia nonprofit corporation. SLF does not have any parent corporation, subsidiaries, or affiliates, and no publicly held corporation owns 10% or more of its stock.

Liberty Justice Center (LJC) is a Texas nonprofit corporation. LJC does not have any parent corporation, subsidiaries, or affiliates, and no publicly held corporation owns 10% or more of its stock.

[1] No party's counsel authored this brief, in whole or in part. No party or party's counsel contributed money intended to fund preparing or submitting this brief. No person, other than Amici, their members, or their counsel, contributed money intended to fund preparing or submitting this brief. In the interest of full transparency, one of the authors of this brief, James V. F. Dickey, was formerly counsel for Plaintiffs-Appellants Christopher Kohls and Mary Franson, but withdrew after joining Southeastern Legal Foundation in August 2025.

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IDENTITY AND INTEREST OF AMICI CURIAE

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ARGUMENT

Members of our Supreme Court have famously said, "[w]e're all textualists now."[2] But to save Minnesota's new anti-deepfake statute, Minnesota Statutes section 609.771, subdivision 1(c), the panel here departed from a textualist analysis by reading an unwritten "parody exception" into the law. *Kohls*, 2026 LX 87005, at *5–6. With an ingrafted parody exception in hand, the panel incorrectly held that Plaintiff-Appellant Christopher Kohls lacks standing to challenge the law. This narrow reading of the law also conflicts with the established "arguably proscribed" test for standing in First Amendment pre-enforcement challenges.[3] Amici thus urge the Court to grant rehearing en banc.

I. The petition should be granted because the panel departed from textualist principles by either mistaking the context of the word "realistic" in the Minnesota anti-deepfake law or silently applying the canon of constitutional avoidance to create a parody exception.

Textualism dominates modern decisions on statutory interpretation. Indeed, "one would be hard pressed to find anyone willing to say that a court should depart

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[2] *West Virginia v. EPA*, 597 U.S. 697, 779 (2022) (Kagan, J., dissenting) (quoting Harvard Law School, The Antonin Scalia Lecture Series: A Dialogue with Justice Elena Kagan on the Reading of Statutes (Nov. 25, 2015)); *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 443 n.6 (2024) (Gorsuch, J., concurring).

[3] This amicus brief focuses on the standing issues, but Amici generally agree with the Plaintiffs-Appellants that the panel assigned too much weight to Plaintiffs-Appellants' purported delay in bringing this lawsuit and should have issued a preliminary injunction.

from statutory text to better serve Congress's purpose. There is a general consensus that the text constrains." Amy Coney Barrett, *Congressional Insiders and Outsiders*, 84 U. Chi. L. Rev. 2193, 2193 (2017). This Court has long agreed: "[W]here the plain meaning of a statute is clear, we are not free to replace it with an unenacted legislative intent." *Owner-Operator Indep. Drivers Ass'n v. Supervalu, Inc.*, 651 F.3d 857, 863 (8th Cir. 2011) (internal quotation marks and citations omitted).

Under textualism, the meaning of a law is that which its words convey to "a reasonable person—one conversant with our social linguistic conventions." Antonin Scalia & John F. Manning, *A Dialogue on Statutory and Constitutional Interpretation*, 80 Geo. Wash. L. Rev. 1610, 1610 (2012). And "the meaning of a word cannot be determined in isolation, but must be drawn from the context in which it is used." *Smith v. United States*, 508 U.S. 223, 241 (1993) (Scalia, J., dissenting) (internal citation and quotation marks omitted); *accord 3M Co. v. Comm'r*, 154 F.4th 574, 580 (8th Cir. 2025) (holding that statutory interpretation "must account for both the specific context in which language is used and the broader context of the statute as a whole") (quoting *Util. Air Regul. Grp. v. EPA*, 573 U.S. 302, 321 (2014)).

Textualism also rejects broadening or narrowing the reach of a statute to capture what a judge thinks a legislature *meant* instead of what the words *say*. *E.g., Pack Priv. Cap., LLC v. Associated Bank, N.A.*, 155 F.4th 981, 985 (8th Cir. 2025) (rejecting a request to ingraft an atextual promissory-estoppel exception to

Minnesota's statute of frauds); *United States v. Washington*, 893 F.3d 1076, 1079 (8th Cir. 2018) (declining to read an exception into the Speedy Trial Act on textualist grounds). Where there is no written exception to a statute's scope, legislative silence is just that: silence. *Alaska Airlines, Inc. v. Brock*, 480 U.S. 678, 686 (1987) ("Congress' silence is just that—silence."). Textualism likewise rejects the use of substantive canons of construction, like the canon of constitutional avoidance, to *override* the best reading of the statute. *See, e.g.*, Brett M. Kavanaugh, *Fixing Statutory Interpretation*, 129 Harv. L. Rev. 2118, 2146 (2016) (asserting there is a "strong case" for arguing that the "constitutional avoidance canon 'acts as a roving commission to rewrite statutes to taste'") (quoting Frank H. Easterbrook, *Do Liberals and Conservatives Differ in Judicial Activism?*, 73 U. Colo. L. Rev 1401, 1405 (2002)).

Amici acknowledge that this Court has applied the canon of constitutional avoidance when deciding between "competing *plausible* interpretations of a statutory text" in determining the merits of a case. *United States v. Wendt*, No. 24-2458, 2026 LX 89618, at *30–31 (8th Cir. Mar. 3, 2026) (Stras, J., concurring) (emphasis added) (quoting *Clark v. Martinez*, 543 U.S. 371, 381 (2005))). But even if the Court applies the canon in such circumstances, invoking constitutional avoidance as part of the standing analysis deprives a litigant of their day in court without the benefit of an opinion imposing that limiting construction on the statute.

If courts are to narrow statutes to pick between two reasonable readings, they should do so on the merits. *See Texas v. Yellen*, 105 F.4th 755, 766 (5th Cir. 2024) ("[T]he federal defendants argue that the canon of constitutional avoidance should guide our interpretation . . . this touches on the merits of the States' claims, which we do not reach when examining standing.") (citing *Warth v. Seldin*, 422 U.S. 490, 500 (1975)).

The panel's standing analysis departed from these principles in one of two ways. Either the panel mistook the meaning of "realistic" in the statutory context or silently applied the canon of constitutional avoidance to create an unwritten parody exception. In the First Amendment pre-enforcement standing analysis, as discussed more below, this is especially problematic because courts should not apply the canon of constitutional avoidance to narrow what a statute "arguably proscribes." *See infra* Section II.

The challenged law proscribes deepfakes, which are

> any . . . ***technological representation*** of speech . . . (1) that is so ***realistic*** that a reasonable person would believe it depicts speech or conduct of an individual who did not in fact engage in such speech or conduct; and (2) ***the production*** of which was substantially dependent upon ***technical means***, rather than the ability of another individual to physically or verbally impersonate such individual.

Minn. Stat. § 609.771, subd. 1(c) (emphasis added).

By its ordinary meaning, in context, the law proscribes Christopher Kohls' deepfake of Kamala Harris,[4] with or without a parody label. In "the context in which it is used," *Smith*, 508 U.S. at 241 (Scalia, J., dissenting), the law criminalizes impersonating speech that is "realistic" because its *visual* realism could fool people. That is why, in context, the legislature targeted the "technical means" that creates the realism, not the seriousness of the impersonation. Again, in context, the legislature exempted, in the next clause, physical or verbal impersonation. Such modes of impersonation, using non-technical means, are far less "realistic," whether parody or not.

The panel appears to have held that applying a parody label (which does not "travel" to re-posts like Representative Franson's because it is not present on the video itself), *Kohls*, 2026 LX 87005, at *7–8) to hyper-realistic AI-generated content makes the speech unrealistic to the reasonable person, *id.* at *5–6. That reading would hold more water if the statute expressly exempted parody and did not focus on deepfakes' technical means of production and technical representation. And that reading would be more persuasive if Minnesota Senator Amy Klobuchar had not called for the removal of Kohls' deepfake from X because of her fear of voter

[4] Mr Reagan (@MrReaganUSA), X (Jul. 26, 2024, at 8:23 AM), https://x.com/MrReaganUSA/status/1816826660089733492.

confusion. Amy Klobuchar (@amyklobuchar), X (Jul. 28, 2024, at 7:55 AM), https://x.com/amyklobuchar/status/1817544497217032196.

Reading "realistic" in the anti-deepfake law to refer to humor as opposed to technical realism is not plausible. So it may be that the panel applied the canon of constitutional avoidance. In other words, the panel may have inferred that the legislature did not intend to unconstitutionally criminalize parody. Even if that were the legislature's intent, however, courts should not override a law's plain meaning with scattered lawmakers' unwritten intent—and especially not at the standing stage. *See, e.g.*, *Texas v. Yellen*, 105 F.4th at 766; *see also Wendt*, 2026 LX 89618, at *30–31 (Stras, J., concurring) (noting that "constitutional avoidance is 'a tool for choosing between competing *plausible* interpretations of a statutory text'" (emphasis added) (quoting *Clark*, 543 U.S. at 381)).[5]

II. The petition should be granted to clarify the "arguably proscribed" standard for First Amendment pre-enforcement challenges.

Where a plaintiff challenges a state statute that allegedly violates his First Amendment rights, the Supreme Court determines standing based on whether the law "*arguably* proscribe[s]" the alleged conduct. *SBA List*, 573 U.S. at 162 (emphasis added). That determination depends on a construction of state law that

[5] While this Court has applied this canon to interpretations of *federal* law, it may be that federal courts "do[] not have the ability to interpret state laws to avoid constitutional questions." William K. Kelley, *Avoiding Constitutional Questions as a Three-Branch Problem*, 86 Cornell L. Rev. 831, 836 n.14 (2001).

hews closely to the text and, if plausible competing interpretations of the law exist, concludes that a plaintiff has standing. *See, e.g.*, *Scott v. Allen*, 153 F.4th 1088, 1096 (10th Cir. 2025) ("Scott need not show that his intended conduct *actually* violates the law, just that it *arguably* does."); *Woodlands Pride, Inc. v. Paxton*, No. 23-20480, 2026 LX 50429, at *18–19 (5th Cir. Feb. 25, 2026) ("'Arguably proscribed' does not require that the plaintiff's interpretation of the challenged law be the *best* interpretation.") (emphasis in original); *Picard v. Magliano*, 42 F.4th 89, 99 (2d Cir. 2022) ("[The] 'arguably proscribed' standard . . . consider[s] whether the plaintiff's proffered interpretation of the statute—which leads them to fear its enforcement against their intended conduct—is arguable or reasonable.").

This interpretive method commands the opposite of the canon of constitutional avoidance in the unique First Amendment pre-enforcement context. If speech is *arguably* proscribed, a plaintiff has standing.[6] This test balances the federal courts' fundamental and competing roles as faithful agent of the legislature, *see generally* Amy Coney Barrett, *Substantive Canons and Faithful Agency*, 90 B.U. L. Rev. 109 (2010), and enforcer of the Constitution through judicial review, *Marbury*

[6] Of course, whether proscribing or chilling a plaintiff's speech is constitutionally acceptable depends on whether the law survives constitutional scrutiny. And the breadth of any injunction resulting from a finding of unconstitutionality depends on the challenge before the court. Conferring standing on plaintiffs whose speech pushes the border of "arguably proscribed" still preserves the government's opportunity to fight on those grounds at summary judgment.

v. Madison, 5 U.S. (1 Cranch) 137, 177 (1803) ("an act of the legislature, repugnant to the constitution, is void"); Federalist No. 78 (Hamilton) ("[W]henever a particular statute contravenes the Constitution, it will be the duty of the judicial tribunals to adhere to the latter and disregard the former.").

When the Supreme Court decided *SBA List* in 2014, this Court became an early adopter of this interpretive method in *281 Care Committee v. Arneson*, 766 F.3d 774 (8th Cir. 2014), where it applied *SBA List*. There, county attorneys were charged with enforcement of a Minnesota law proscribing false statements about the effect of ballot questions. *Id.* at 778. Like here, the county attorneys argued that the plaintiffs' statements were "beyond the reach of the statute" because the plaintiffs intended to make conjecture and exaggeration, not false statements. *Id.* at 780. Rather than narrowing the Minnesota false-statement law, the Court held that the plaintiffs' proposed true statements "*could* fall within" the scope of the law because "complaints *could* be lodged" against the plaintiffs if a prosecutor or citizen believed their speech crossed the statutory line. *Id.* at 781–82 (emphasis added). The threat posed by the anti-deepfake law is remarkably similar. *Compare id. with* Minn. Stat. § 609.771, subd. 4 (conferring a cause of action on the attorney general, county attorneys, aggrieved individuals, and politicians).

The Court has, both in this case and in other recent cases, cited *SBA List* for the First Amendment pre-enforcement standing test. *Kohls*, 2026 LX 87005, at *5–

6; *Parents Defending Educ. v. Linn Mar Cmty. Sch. Dist.*, 83 F.4th 658, 667 (8th Cir. 2023). But as then-Chief Judge Smith strongly implied in a recent dissent, the Court sometimes lacks clarity as to whether it is applying the "arguably proscribed" test or an "actually proscribed" test. *See Christian Action League v. Freeman*, 31 F.4th 1068, 1075–76 (8th Cir. 2022) (Smith, C.J., dissenting).

That does appear to be what happened here. Whether by reading "realistic" to categorically exclude parody, or by narrowing the statute to exempt parody without a written exception, the panel narrowed the scope of Minnesota's anti-deepfake law, contrary to the Supreme Court's approach in *SBA List*. The en banc Court should therefore grant rehearing to resolve the apparent intra-circuit split on the "arguably proscribed" test for construing challenged statutes at the standing stage of pre-enforcement First Amendment suits.

CONCLUSION

The Court should grant the petition for rehearing en banc.

Dated: March 16, 2026

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