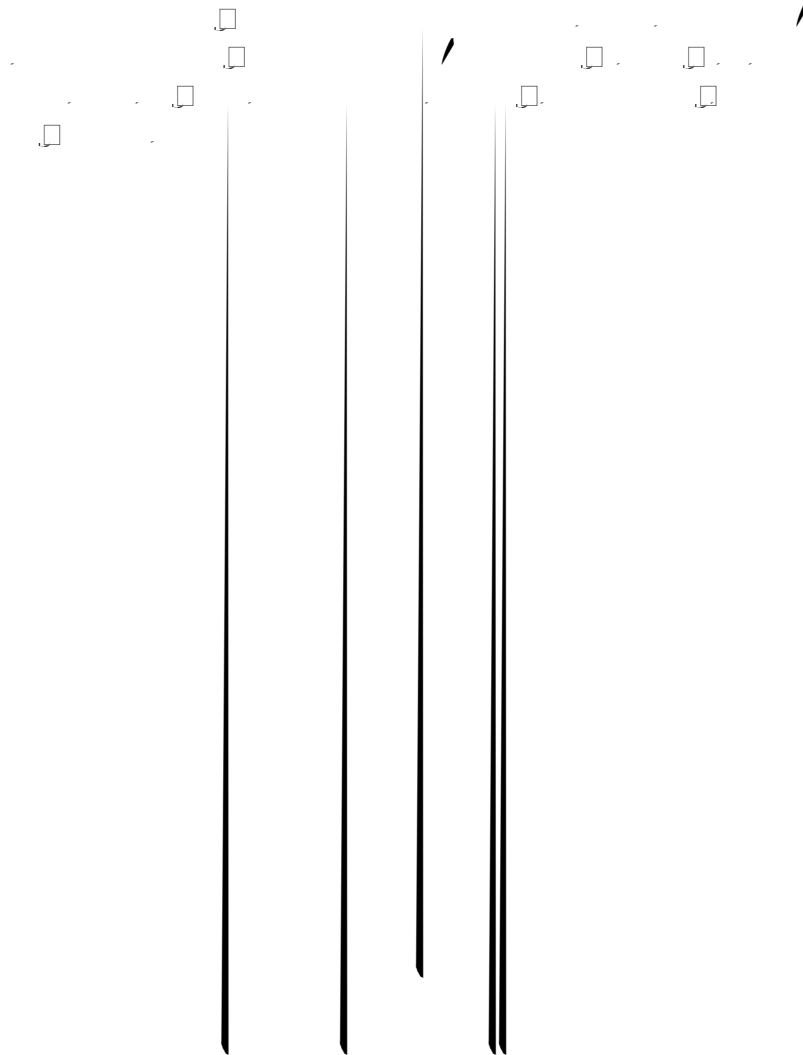


No. 20-1374

In the Supreme Court of the United States

-----  
/                      /                      /

## QUESTION PRESENTED



## TABLE OF CONTENTS

*AMICI CURIAE*

## TABLE OF AUTHORITIES

### Cases

*A Helping Hand, LLC v. Baltimore County*

*Doe v. Mass. Dep't of Correction* /  
( 11 )

*Fullilove v. Klutznick* /  
( )

*G. F. v. Contra Costa Cty.* /  
( )

*Greater Los Angeles Council on Deafness, Inc. v.  
Cmty. Television of S. Calif.* /  
( )

*Grove City Coll. v. Bell* /  
( )

*Jim C. v. United States* /  
( )

*Koslow v. Pennsylvania* /  
( )

*Kumar v. Gate Gourmet Inc.* /  
( 11 )

*Lovell v. Chandler* /  
( ) /

*Marriott Senior Living Servs., Inc. v. Springfield  
Twp.* /  
( )

*Melani v. Chipotle Servs., LLC* /  
( / )

*Nieves-Marquez v. Puerto Rico* /  
( 1 )

*Raytheon Co. v. Hernandez* /  
( )

/





( )





**INTRODUCTION AND SUMMARY OF  
ARGUMENT**

□ □ □ □ □

/

( ) ( ) ( ) □ ( )

( ) ( ) ( ( ) ( ) ( ) ( ) ( )

□ □

**ARGUMENT**

**I. Expanding Section 504 To Include  
Disparate-Impact Liability Could Lead To  
Crippling Consequences For State And  
Local Governments.**

*any program or*

activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service

( ) ( )

*Id.* ( )

Constantine &  
Visitors of George Mason Univ.  
( ) ( ) *Barbour v. Wash. Metro. Area*  
*Transit Auth.* ( )  
( ) *Nieves-Marquez v. Puerto Rico*  
( ) *Lovell v. Chandler*  
( ) *Koslow v. Pennsylvania*  
( )

*South Dakota v. Dole* ( )  
( *Fullilove v. Klutznick* )  
( ) ( )

*Chandler*  
*also Barbour*  
*United States*  
(

*Lovell v.*  
( ) *see*  
( ) *Jim C. v.*  
( )

( ) *accord Grove City v. Bell*  
( ) ( )  
( )

*see also id.*

*Barbour*  
(

see

*Greater Los Angeles Council on Deafness, Inc. v. Cnty. Television of S. Calif.*

( ) ( *Cannon v. Univ. of Chicago* ) ( )

see

*Table 12.3—Total Outlays for Grants to State and Local Governments, by Function, Agency, and Program: 1940–2022*

*First*

\$

*Second*

\$

*Id.*

*Id.*

*See*

( )

)

( )

**II. Expanding Section 504 Would Be Especially Unwarranted And Pernicious Because A Number Of Overlapping Federal And State Regimes Already Impose Disparate-Impact Liability.**

( ) ( ) ( ) ( ) ( ) ( )

*Co. v. Hernandez*

( )

*Id.* (

( ))

*Hous. & Cmty. Affs. v. Inclusive Communities Project, Inc.* *et seq.* See *Texas Dep't of*

*Id.*

*Greater Toledo v. City of Sandusky* *Ability Ctr. of*

( ( ( ) ( ) ) )

( )

et seq. /

Id. ( ) ( )

( ) ( ) s also

Id. /



Servs., LLC/

( ) accord *Melani v. Chipotle*

OR

See

accord *Bishop v. City of Austin*/

et seq. *Kumar v. Gate Gourmet Inc.*/

See

*Avila v. Cont'l Airlines, Inc.*/



## CONCLUSION

☐ ☒ *amici curiae*

☐ ☐ *Counsel of Record*

☐  
( )

/

/

☐

☐