No. 15-5238

IN THE SUPREME COURT OF THE UNITED STATES

LESTER RAY NICHOLS, PETITIONER

v.

UNITED STATES OF AMERICA

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE TENTH CIRCUIT

BRIEF FOR THE UNITED STATES IN OPPOSITION

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QUESTIONS PRESENTED

1. Whether petitioner violated 18 U.S.C. 2250(a) by failing to update his sex-offender registration under the Sex Offender Registration and Notification Act (SORNA), 42 U.S.C. 16901 et seq., when he abandoned his residence in Kansas and moved to the Philippines.

2. Whether SORNA's delegation of authority to the Attorney General to issue regulations under 42 U.S.C. 16913(d) violates the nondelegation doctrine.

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OPINIONS BELOW

The opinion of the court of appeals (Pet. App. 1-15) is reported at 775 F.3d 1225. The order of the court of appeals denying rehearing (Pet. App. 25-49) is reported at 784 F.3d 666. The order of the district court denying petitioner's motion to dismiss (Pet. App. 16-24) is not reported in the Federal Supplement but is available at 2013 WL 6000016.

JURISDICTION

The judgment of the court of appeals was entered on December 30, 2014. A petition for rehearing was denied on April 15, 2015 (Pet. App. 25-26). The petition for a writ of certiorari was filed

on July 14, 2015. The jurisdiction of this Court is invoked under 28 U.S.C. 1254(1).

STATEMENT

Following a conditional guilty plea of guilty in the United States District Court for the District of Kansas, petitioner was convicted of failing to update his registration as a sex offender, in violation of 18 U.S.C. 2250(a). He was sentenced to ten months of imprisonment. The court of appeals affirmed.

1. Since at least 1996, all 50 States and the District of Columbia have had sex-offender-registration laws. See Smith v. Doe, 538 U.S. 84, 90 (2003). On July 27, 2006, Congress enacted the Sex Offender Registration and Notification Act (SORNA), 42 U.S.C. 16901 et seq., which "establishe[d] a comprehensive national system for the registration of [sex] offenders." 42 U.S.C. 16901.

SORNA requires, as a matter of federal law, every sex offender to "register, and keep the registration current, in each jurisdiction where the offender resides, where the offender is an employee, and where the offender is a student." 42 U.S.C. 16913(a). SORNA defines a "sex offender" as "an individual who was convicted of a sex offense" that falls within the statute's defined offenses. 42 U.S.C. 16911(1) and (5)-(7). SORNA provides that a sex offender "shall initially register" either "before completing a sentence of imprisonment with respect to the offense giving rise to the registration requirement" or, "if the sex offender is not sentenced to a

term of imprisonment," "not later than 3 business days after being sentenced for that offense." 42 U.S.C. 16913(b). SORNA also directs that, "not later than 3 business days after each change of name, residence, employment, or student status," a sex offender "shall * * * appear in person in at least 1 jurisdiction involved pursuant to subsection (a) [i.e., where the sex offender resides, is an employee, or is a student] and inform that jurisdiction of all changes in the information required for that offender in the sex offender registry." 42 U.S.C. 16913(c). And SORNA delegates to the Attorney General the permissive authority to promulgate regulations in certain situations:

> Initial registration of sex offenders unable to comply with subsection (b) of this section
>
> The Attorney General shall have the authority to specify the applicability of the requirements of this subchapter to sex offenders convicted before the enactment of this chapter or its implementation in a particular jurisdiction, and to prescribe rules for the registration of any such sex offenders and for other categories of sex offenders who are unable to comply with subsection (b).

42 U.S.C. 16913(d).

To enforce those registration requirements, Congress created a federal criminal offense penalizing nonregistration. See 18 U.S.C. 2250(a). Under 18 U.S.C. 2250(a), a convicted sex offender who "is required to register under [SORNA]," "travels in interstate or foreign commerce," and then "knowingly fails to register or update a registration as required by [SORNA]" may be punished by up to ten years of imprisonment. Carr v. United States, 560 U.S. 438, 445-

446 (2010) (quoting 18 U.S.C. 2250(a)). Sex offenders convicted before the Act's enactment on July 27, 2006, were not "required to register under [SORNA]" until the Attorney General exercised his delegated authority under 42 U.S.C. 16913(d) to "specif[y] that the Act's registration provisions apply to them." Reynolds v. United States, 132 S. Ct. 975, 980 (2012).

On February 28, 2007, the Attorney General issued an interim rule, effective on that date, specifying that "[t]he requirements of [SORNA] apply to all sex offenders, including sex offenders convicted of the offense for which registration is required prior to the enactment of that Act." 28 C.F.R. 72.3. On July 2, 2008, the Attorney General (in coordination with the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking) promulgated final guidelines for the States and other jurisdictions on matters of SORNA's implementation. See Office of the Att'y Gen., U.S. Dep't of Justice, The National Guidelines for Sex Offender Registration and Notification, 73 Fed. Reg. 38,030. The guidelines were issued after notice and comment and they reaffirmed SORNA's application to all sex offenders. Id. at 38,035-38,036, 38,046, 38,063.[1]

[1] On December 29, 2010, the Federal Register published an Attorney General order finalizing the interim rule, with one clarifying change in an example to avoid any inconsistency with this Court's decision in Carr, supra. See Office of the Att'y Gen., U.S. Dep't of Justice, Applicability of the Sex Offender Registration and Notification Act, 75 Fed. Reg. 81,849.

2. In 2003, petitioner was convicted of traveling interstate with intent to have sex with a minor, in violation of 18 U.S.C. 2423(b), and was sentenced to a 120-month term of imprisonment. Petitioner's conviction occurred before SORNA's enactment in 2006, but he was subject to SORNA's requirements under the Attorney General's rule. See 28 C.F.R. 72.3; Pet. App. 2.

By 2012, petitioner was released from prison and had been placed on federal supervision in the District of Kansas. Until that time, petitioner had complied with registration requirements under both SORNA and Kansas law. In November 2012, however, petitioner flew from Kansas City to Manila, Philippines, without updating his sex-offender registration. One month later, he was arrested by Filipino law-enforcement officers and deported to the United States. Pet. App. 3.

Charged with a violation of Section 2250(a), petitioner moved to dismiss the indictment before trial on the grounds that he did not violate SORNA while in the Philippines and that SORNA's registration provision violates the nondelegation doctrine. The district court denied the motion. Pet. App. 16-24. Petitioner entered a conditional guilty plea that allowed him to raise both issues on appeal. Id. at 4.

3. The court of appeals affirmed. Pet. App. 1-15. With respect to petitioner's statutory-construction argument, the court held that petitioner violated SORNA when he left his residence in

Kansas and moved to the Philippines without updating his registration to reflect that Kansas was no longer his residence. Id. at 5-9. The court relied on its previous decision in United States v. Murphy, 664 F.3d 798 (10th Cir. 2011), which also involved a registered sex offender who left his residence in the United States and moved to a foreign country. In Murphy, the court reasoned that when a sex offender abandons his current living place, that constitutes a "change" of residence that triggers the obligation under Section 16913(c) to update a sex-offender registration, even if the offender has not yet established a new residence. Id. at 801-803. Murphy further concluded that, when an offender leaves his residence in a State and also leaves the State altogether, that State remains a "jurisdiction involved" under SORNA. Id. at 803. And it concluded that the obligation to update the registration to reflect the abandoned residence does not disappear simply because the sex offender relocates to a non-SORNA jurisdiction (such as a foreign country) before the three-day deadline for updating his registration passes. Ibid. The decision below reiterated those three propositions from Murphy, Pet. App. 6-7, and also rejected petitioner's contention that the decision in Murphy is inconsistent with this Court's earlier decision in Carr, supra, Pet. App. 8.

With respect to petitioner's constitutional argument, the court of appeals concluded that Section 16913(d)'s delegation to the Attorney General does not violate the nondelegation doctrine.

Pet. App. 9-13. It reasoned that Congress had given the Attorney General sufficiently intelligible principles upon which to exercise his delegated authority, had delineated the boundaries of that authority by limiting the delegation to pre-enactment sex offenders, and imposed other limits by identifying the crimes subject to SORNA as well as the time, place, and method of registration. Id. at 10-12. The court rejected petitioner's contention that it should evaluate the delegation under "the more rigorous 'meaningfully constrains' standard instead of the 'intelligible principle' standard" traditionally associated with the nondelegation doctrine. Id. at 12-13.

Judge McKay concurred. Pet. App. 15. He agreed with the panel's constitutional analysis and also agreed that its statutory-interpretation holding was controlled by Murphy, though he expressed his disagreement with Murphy itself. Ibid.

4. The court of appeals denied rehearing en banc. Pet. App. 25. Judges Lucero and Gorsuch filed opinions dissenting from the denial. Judge Lucero characterized the Eighth Circuit's decision in United States v. Lunsford, 725 F.3d 859, 860 (8th Cir. 2013), as having "created a circuit split" with the Tenth Circuit's decision in Murphy "regarding the applicability of SORNA's notice provisions to offenders who leave the country." Pet. App. 27. Judge Lucero noted that he continued to disagree with Murphy (in which he had dissented). Ibid. He agreed with Judge Gorsuch that it would also

be appropriate to grant rehearing on the nondelegation question. Id. at 28.

Judge Gorsuch's opinion dissenting from the denial of rehearing noted a "split" between Murphy and Lunsford, Pet. App. 29, but focused principally on the nondelegation question, concluding that SORNA's delegation to the Attorney General would impermissibly allow the prosecutor to play a role in defining a crime that he is responsible for enforcing, id. at 29-49.

ARGUMENT

1. Petitioner contends (Pet. 12-25) that the court of appeals erred in holding that he was required by SORNA to update his registration in Kansas when he abandoned his residence there to move to the Philippines. That contention lacks merit. Although there is tension between the reasoning of the decision below and that of the Eighth Circuit's decision in United States v. Lunsford, 725 F.3d 859 (2013), there is no square conflict between them, and the issue has arisen in only a handful of reported cases. Further review is unwarranted.

a. The court of appeals correctly concluded that petitioner was required to update his registration to reflect a change in his residence when he abandoned his Kansas residence and then traveled to the Philippines. In petitioner's view, the obligation that SORNA imposes on a sex offender to keep his registration information "current," 42 U.S.C. 16913(a) -- including information about

any "changes in the information" about his residence, 42 U.S.C. 16913(c) -- applies only as long as he continues to reside, work, or study in at least one jurisdiction where he is subject to SORNA's registration requirements. Because the Philippines (the location of his new residence) was not such a jurisdiction, see 42 U.S.C. 16911(10), petitioner contends (Pet. 19-22) that there was no "jurisdiction involved" in which he was required to report, "not later than 3 business days after each change of * * * residence," to "inform that jurisdiction of all changes in the information required for that offender in the sex offender registry," 42 U.S.C. 16913(c).

As the court of appeals explained, however, petitioner's obligation under Section 16913 to update his registration information to reflect a change of residence was triggered when he abandoned his residence in Kansas, and, even though the statute permitted him three business days to make the update, the obligation did not disappear simply because he had subsequently established a new residence in a non-SORNA jurisdiction. Pet. App. 6-7; see United States v. Murphy, 664 F.3d 798, 801-803 (10th Cir. 2011). Moreover, when petitioner's obligation to update his registration information to reflect his abandonment of Kansas was triggered, Kansas was still a "jurisdiction involved" under SORNA. Id. at 803.

In response, petitioner contends (Pet. 21-22) that it would have been impractical for him to return from the Philippines within three business days to make the update in person, and he further contends (Pet. 23-24) that SORNA's purposes would not be served by requiring offenders to give notice when they are moving to a foreign country rather than another SORNA jurisdiction. But petitioner did not have to return to Kansas to update his registration; he could have complied with his obligation by informing Kansas authorities in advance of his travel that he was abandoning his Kansas residence. And such an update would have served SORNA's purposes by ensuring that its "comprehensive" national sex-offender registration system would be "more uniform and effective" than the prior "patchwork" of registration systems, because it would have prevented that system from containing erroneously outdated and affirmatively misleading information about a sex offender's "current" residence. Reynolds v. United States, 132 S. Ct. 975, 978 (2012).

For those reasons, the SORNA Guidelines issued by the Attorney General in 2008 explained that a sex offender must "inform the jurisdiction if the sex offender is terminating residence * * * in the jurisdiction, even if there is no ascertainable or expected future place of residence." 73 Fed. Reg. at 38,066. The Guidelines further explained that the same requirement is triggered when an offender moves overseas. See id. at 38,066-38,067 ("If a sex

offender simply leaves the country and does not inform the jurisdiction or jurisdictions in which he has been registered, then the requirement to keep the registration current will not have been fulfilled. Rather, the registry information in the domestic jurisdictions will show that the sex offender is residing in the jurisdiction (or present as an employee or student) when that is no longer the case."); see also 76 Fed. Reg. 1637 (2011) (explaining that such notifications also assist the federal government in complying with its obligation under 42 U.S.C. 16928 to "establish and maintain a system" for informing SORNA jurisdictions "about persons entering the United States who are required to register").[2]

b. Petitioner further errs in contending (Pet. 19-20) that the court of appeals' analysis conflicts with this Court's decision in Carr v. United States, 560 U.S. 438 (2010). In Carr, the Court held that the federal criminal offense of failing to register under 18 U.S.C. 2250(a) is inapplicable when a sex offender's only travel in interstate commerce occurred before SORNA became effective and imposed a registration obligation on him. Id. at 442. In doing so, the Court accepted the parties' understanding that all three elements of a Section 2250(a)(2)(B) violation -- a requirement to register under SORNA, travel in interstate or foreign commerce, and

[2] In addition to the Guidelines, the Department of Justice has developed and expects to publish proposed regulations consistent with the decision below that articulate sex offenders' obligations under SORNA to report to their jurisdictions of residence before they relocate to a foreign country.

a knowing failure to register or update a registration -- must occur "in sequence." Id. at 446. That is consistent with the decision below. Although petitioner's obligation to update his registration was triggered when he was still in Kansas, and before he had traveled to the Philippines, his failure to update the registration became complete only when the three-business-day deadline had elapsed. See United States v. Lewis, 768 F.3d 1086, 1091 n.4 (10th Cir. 2014) ("[W]e simply hold that a conditional obligation [to update the registration] is triggered when the offender abandons his residence, not when he crosses state lines. When the offender thereafter completes steps two (crossing state lines) and three (failing to register) sequentially, he is subject to prosecution in the departure district.").[3]

c. Petitioner's reliance (Pet. 24) on the rule of lenity is also misplaced. The rule of lenity "is not applicable unless there is a grievous ambiguity or uncertainty in the language and structure of [a statute], such that even after a court has seized every thing from which aid can be derived, it is still left with an

[3] Petitioner relies (Pet. 20) on Carr's refusal to read the present-tense reference to someone who "'resides i[n] Indian country'" as including "persons who once resided in Indian country but who left before SORNA's enactment." 560 U.S. at 449 (quoting 18 U.S.C. 2250(a)(2)(B)). The decision below, however, turns on where petitioner was residing when he abandoned his Kansas residence in November 2012, years after SORNA was enacted and petitioner was made subject to its requirement that he "register, and keep the registration current, in each jurisdiction where [he] resides." 42 U.S.C. 16913(a).

ambiguous statute." Chapman v. United States, 500 U.S. 453, 463 (1991) (internal quotation marks, brackets, and citation omitted). As discussed above, no grievous ambiguity or "equipoise of competing reasons" (Johnson v. United States, 529 U.S. 694, 713 n.13 (2000)) exists in the phrase "jurisdiction where the offender resides" in Section 16913(a) or in the term "residence" in Section 16913(c). Nor does any tension between the decision below and an Eighth Circuit decision (discussed below) require application of the rule of lenity. This Court has repeatedly rejected the contention that a division in judicial authority establishes that a statute is "ambiguous" for purposes of lenity. See, e.g., Reno v. Koray, 515 U.S. 50, 64-65 (1995); Moskal v. United States, 498 U.S. 103, 108 (1990); see also United States v. Hayes, 555 U.S. 415, 420, 429 (2009) (noting division among circuits before finding the rule of lenity inapplicable in a criminal case).

d. Petitioner contends (Pet. i, 3, 12-17) that the decision below conflicts with the Eighth Circuit's decision in Lunsford, supra, but no square conflict exists, because Lunsford involved a factual scenario that is distinguishable from this case. In Lunsford, the court held that SORNA's requirement for a sex offender to update his registration did not apply to a sex offender who moved from Kansas City, Missouri, to the Philippines, because it found "no textual basis for requiring an offender to update his registration in a jurisdiction where he formerly 'resided.'" 725

F.3d at 861. In doing so, however, the court emphasized that Lunsford was not required to notify Missouri of his change of residence because the "stipulated factual basis for [his] guilty plea demonstrate[d] that he did not reside in Missouri when he changed his residence." Ibid. (emphasis added). As the court explained, on May 3, Lunsford had "boarded a flight from Kansas City to the Philippines on a round-trip ticket, with a return scheduled for May 24," id. at 860, but he "did not change his residence and trigger a reporting obligation until after he left the United States" and decided not to use the return ticket, id. at 861 (emphasis added).

Here, by contrast, petitioner was still residing in Kansas when he abandoned that residence, which required him to update his registration in at least one jurisdiction within three days of that change of residence, even if he had not already established a new residence. Although Lunsford rejected the government's reliance on the Tenth Circuit's decision in Murphy, it indicated that it disagreed with the Tenth Circuit only to the extent that the latter would allow a registration obligation to be triggered in a place of former rather than current residence. 725 F.3d at 862. Murphy itself anticipated precisely such a distinction. See 664 F.3d at 804 ("In contrast, if a sex offender is already living abroad when a change of employment or residence occurs, SORNA does not require the offender to update the registry of a prior SORNA jurisdic-

tion."). And that distinction has been recognized by the only other court that appears to have addressed the potential conflict between Murphy and Lunsford. See Carr v. United States, No. 2:13-00091, 2014 WL 655382, at *5 (M.D. Tenn. Feb. 20, 2014) (noting that "the facts at issue in [Lunsford] suggest a more limited holding" than in the Tenth Circuit's cases because Lunsford "did not decide to change his residence (and not use the return plane ticket) until after he left the United States"), appeal pending, No. 14-5368 (6th Cir. briefing completed on Mar. 2, 2015).

Finally, the question whether a sex offender's move to a foreign country triggers a SORNA obligation to update a registration has apparently arisen in only a handful of cases (the three cases mentioned in the preceding paragraph and the Tenth Circuit's decisions in Lewis, supra; United States v. Forster, 549 Fed. Appx. 757 (2013); and this case). And petitioner himself cannot claim that he lacked notice about SORNA's applicability, since his failure to update his registration occurred in November 2012 (Pet. App. 3), nearly a year after the Tenth Circuit's decision in Murphy and more than eight months before the Eighth Circuit's decision in Lunsford. Under the circumstances, further review of the statutory-construction question is unwarranted.

2. With respect to the second question presented, petitioner contends (Pet. 25-32) that SORNA's delegation of authority to the Attorney General to issue regulations under 42 U.S.C. 16913(d)

violates the nondelegation doctrine. Every court of appeals to decide such a nondelegation challenge to SORNA has rejected it -- ten of them in published decisions and one in multiple unpublished ones. See, e.g., Pet. App. 9-13 (10th Cir.); United States v. Richardson, 754 F.3d 1143, 1145-1146 (9th Cir. 2014); United States v. Cooper, 750 F.3d 263, 266-272 (3d Cir.), cert. denied, 135 S. Ct. 209 (2014); United States v. Goodwin, 717 F.3d 511, 516-517 (7th Cir. 2013), cert. denied, 134 S. Ct. 334 (2013); United States v. Kuehl, 706 F.3d 917, 919-920 (8th Cir. 2013); Parks v. United States, 698 F.3d 1, 7-8 (1st Cir. 2012), cert. denied, 133 S. Ct. 2021 (2013); United States v. Felts, 674 F.3d 599, 606 (6th Cir. 2012); United States v. Guzman, 591 F.3d 83, 91-93 (2d Cir.), cert. denied, 561 U.S. 1019 (2010); United States v. Whaley, 577 F.3d 254, 262-264 (5th Cir. 2009); United States v. Ambert, 561 F.3d 1202, 1212-1214 (11th Cir. 2009); see also United States v. Sampsell, 541 Fed. Appx. 258, 259 (4th Cir. 2013) (noting that the Fourth Circuit has "consistently rejected similar non-delegation challenges in unpublished decisions").

This Court has repeatedly denied petitions for a writ of certiorari raising the same nondelegation claim, and it has continued to do so after Justice Scalia's January 2012 dissenting opinion in Reynolds, on which petitioner relies (Pet. 30, 31). See, e.g., Harges v. United States, 135 S. Ct. 507 (2014) (No. 14-6748); Stacey v. United States, 135 S. Ct. 419 (2014) (No. 14-6321);

Crosby v. United States, 135 S. Ct. 390 (2014) (No. 14-6167); Cooper v. United States, 135 S. Ct. 209 (2014) (No. 14-5174); Atkins v. United States, 134 S. Ct. 56 (2013) (No. 12-9062); Mitchell v. United States, 133 S. Ct. 2854 (2013) (No. 12-8807); Parks v. United States, 133 S. Ct. 2021 (2013) (No. 12-8185); Clark v. United States, 133 S. Ct 930 (2013) (No. 12-6067); Rogers v. United States, 133 S. Ct. 157 (2012) (No. 11-10450); Yelloweagle v. United States, 132 S. Ct. 1969 (2012) (No. 11-7553); Johnson v. United States, 132 S. Ct. 135 (2011) (No. 10-10330); Beasley v. United States, 562 U.S. 801 (2010) (No. 09-10316); May v. United States, 556 U.S. 1258 (2009) (No. 08-7997). There is no reason for a different outcome here.

This Court's decisions recognize that the nondelegation doctrine is satisfied when a statutory grant of authority sets forth an "intelligible principle" that "clearly delineates the general policy, the public agency which is to apply it, and the boundaries of this delegated authority." Mistretta v. United States, 488 U.S. 361, 372-373 (1989) (citation omitted). As the Court has repeatedly observed, it has found only two statutes that lacked the necessary "intelligible principle" -- and it has not found any in the last 70 years. Whitman v. American Trucking Ass'ns, 531 U.S. 457, 474 (2001) (referring to A.L.A. Schechter Poultry Corp. v. United States, 295 U.S. 495 (1935), and Panama Ref. Co. v. Ryan, 293 U.S. 388 (1935)); see Loving v. United States, 517 U.S. 748, 771 (1996)

(same); Mistretta, 488 U.S. at 373 (same); id. at 416 (Scalia, J., dissenting) (explaining that the Court has "almost never felt qualified to second-guess Congress regarding the permissible degree of policy judgment that can be left to those executing or applying the law").

In enacting SORNA, Congress "broadly set policy goals that guide the Attorney General" -- it "created SORNA with the specific design to provide the broadest possible protection to the public, and to children in particular, from sex offenders." Ambert, 561 F.3d at 1213. Congress appropriately identified the Attorney General as its agent, see 42 U.S.C. 16913(d), and it "made virtually every legislative determination in enacting SORNA, which has the effect of constricting the Attorney General's discretion to a narrow and defined category." Ambert, 561 F.3d at 1214; see Guzman, 591 F.3d at 93 (explaining that Congress delineated the crimes requiring registration, the circumstances of registration, the information required to register, and the penalties for non-registration, leaving to the Attorney General only the applicability of SORNA to a discrete set of persons). This "Court has upheld much broader delegations than" Section 16913(d). Guzman, 591 F.3d at 93 (citing Mistretta, 488 U.S. at 372-373); cf. Touby v. United States, 500 U.S. 160, 165 (1991) (upholding the Attorney General's power to schedule controlled substances on a temporary basis). Further review is not warranted.

CONCLUSION

The petition for a writ of certiorari should be denied.

Respectfully submitted.

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