

**Context:**

This document is part of the experiment described in the following blog post:

*Student Note: ChatGPT Ate My Homework. Can LLMs Generate Compelling Case Briefs?*

<https://lil.law.harvard.edu/blog/2024/06/10/can-llms-generate-compelling-case-briefs/>

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## Trump v. Anderson (2024)

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**Case Name:** Trump v. Anderson

**Citation:** 601 U.S. \_\_\_\_ (2024)

**Date Decided:** March 4, 2024

**Facts:**

A group of Colorado voters argued that former President Donald J. Trump is ineligible to seek the Presidency again under Section 3 of the Fourteenth Amendment due to his actions surrounding the January 6, 2021, Capitol breach. The Colorado Supreme Court ordered the state's secretary of state to exclude Trump from the Republican primary ballot.

**Procedural History:**

The case originated in Colorado state court, where the District Court found Trump had engaged in insurrection but denied the petition based on its interpretation of Section 3. The Colorado Supreme Court reversed this decision, leading to Trump's challenge in the U.S. Supreme Court.

**Issues:**

Whether the Colorado Supreme Court erred in ordering Trump excluded from the 2024 presidential primary ballot based on Section 3 of the Fourteenth Amendment.

**Holding:**

The U.S. Supreme Court held that the Constitution assigns Congress, not the States, the responsibility for enforcing Section 3 against federal officeholders and candidates.

**Rationale:**

The Court reasoned that Section 3 was designed to prevent former Confederates from returning to power post-Civil War by imposing a penalty—disqualification from holding office. The Constitution empowers Congress to enforce this provision through legislation, as indicated by Section 5 of the Amendment. The Court found it implausible that the Amendment would grant States the power to enforce Section 3 against federal officeholders and candidates, especially given the Amendment's aim to expand federal power at the expense of state autonomy. The Court also highlighted the lack of historical precedent for state

enforcement of Section 3 against federal candidates and the potential chaos of conflicting state decisions regarding a candidate's eligibility.

**Disposition:**

The judgment of the Colorado Supreme Court was reversed.

**Concurring Opinions:**

Justice Barrett concurred in part and in the judgment, emphasizing that the principle that States lack the power to enforce Section 3 against Presidential candidates is sufficient to resolve the case. Barrett cautioned against deciding more than necessary, advocating for judicial restraint.

Justices Sotomayor, Kagan, and Jackson concurred in the judgment, critiquing the majority for resolving questions not before the Court and for unnecessarily limiting the means of enforcing Section 3. They emphasized the importance of federalism principles in their concurrence, arguing that the majority's additional conclusions were not required to decide the case.

**Dissenting Opinions:**

No dissenting opinions were reported.

**Analysis:**

The Supreme Court's decision in *Trump v. Anderson* clarifies the constitutional balance of power between the federal government and the states regarding the enforcement of Section 3 of the Fourteenth Amendment. The majority's rationale, supported by historical context and the specific language of the Constitution, underscores Congress's exclusive role in enforcing disqualifications under Section 3. The concurring opinions, particularly those of Justices Sotomayor, Kagan, and Jackson, highlight a tension between judicial restraint and the Court's decision to address broader constitutional questions. Justice Barrett's concurrence further emphasizes the need for caution in judicial decision-making, suggesting that the Court's reach exceeded its grasp in this case. This decision sets a precedent for how similar cases might be approached in the future, particularly those involving the eligibility of federal officeholders and candidates under Section 3 of the Fourteenth Amendment.