No. 26-93

IN THE
Supreme Court of the United States

JOHN REAM,

Petitioner,

v.

DEPARTMENT OF THE TREASURY, *et al.*,

Respondents.

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

BRIEF *AMICUS CURIAE* OF THE GOLDWATER INSTITUTE IN SUPPORT OF PETITIONER

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INTEREST OF AMICUS CURIAE[1]

The Goldwater Institute is a nonprofit, nonpartisan organization dedicated to defending the constitutional principles of limited government, federalism, and individual liberty through litigation, scholarship, and legislative advocacy nationwide. A substantial part of Goldwater's work involves defending Americans who earn a living, or simply pursue a hobby, from their own homes against government overreach.

In service of that mission Goldwater drafted the model Home-Based Business Fairness Act, which has now been adopted in multiple States, including Iowa, Missouri, Texas, West Virginia, and North Carolina, and which limits local governments' authority to curtail the right of home-based business owners. Goldwater has likewise supported cottage-food reforms that allow individuals to prepare and sell food from their own kitchens free of regulatory schemes designed for large-scale commercial producers. Across this body of work, Goldwater's consistent position is that small-scale production conducted inside the home occupies a category of American economic life that the Constitution leaves primarily to the States and to individual liberty, not to an open-ended federal police power.

This case implicates both concerns. It presents, in unusually clean form, the doctrinal question whether

1. Pursuant to Rule 37, counsel for amicus affirms that no counsel for any party authored this brief in whole or part, and no person or entity, other than amicus, its members, or counsel, made any monetary contribution to its preparation or submission. All parties received notice of amicus' intention to file at least ten days before the due date.

the Necessary and Proper Clause means the same thing regardless of which enumerated power Congress invokes. It also presents, in concrete form, the practical question whether the Federal Government may extend that power into the literal kitchens, garages, and workshops where millions of Americans continue our rich history of home production. Goldwater submits this brief to bring these perspectives to bear on the Court's certiorari decision.

SUMMARY OF ARGUMENT

Since *McCulloch v. Maryland*, 17 U.S. (4 Wheat.) 316 (1819), this Court has maintained a single standard for determining whether Congress's actions in carrying into execution an enumerated power satisfy the Necessary and Proper Clause. First, the federal end must be legitimate and within the Constitution's scope; second, the means must be appropriate and plainly adapted to that end; and third, those means must neither be prohibited nor inconsistent with the Constitution's letter and spirit. *Id.* at 421. That standard does not change depending on whether Congress invokes the Taxing, Commerce, or Spending Powers, or some other enumerated authority. The underlying constitutional end changes. The Necessary and Proper inquiry does not.

But this Court's cases have allowed its formally uniform standard to operate with different levels of rigor. *NFIB v. Sebelius*, 567 U.S. 519, 558-61 (2012), *United States v. Kebodeaux*, 570 U.S. 387, 394-99 (2013), and *Landor v. Louisiana Dep't of Corr. and Pub Safety*, 146 S. Ct. 1931, 1946-48 (2026), all treat propriety, federalism, and the risk of creating general police power as independent limiting considerations. But *Gonzales v. Raich*, 545 U.S.

1, 22 (2005), *United States v. Comstock*, 560 U.S. 126, 133-37 (2010), and *Sabri v. United States*, 541 U.S. 600, 605 (2004), however have often been read as asking only whether a measure is rationally useful. Lower courts have inherited both approaches, leaving the standard uniform in formulation but unreliable in application.

This case presents an unusually clean opportunity to correct that drift because the Government has defended the same federal prohibition under two different enumerated powers. The Sixth Circuit upheld the home-distilling ban as a necessary and proper incident of Congress's Taxing Power. App. 12-13. The Government has also defended that same prohibition as a necessary and proper incident of the Commerce Power under *Raich*. Both theories therefore depend on the same constitutional bridge: the Government advances a theory based on a rhetorical chain from enumerated power through the Necessary and Proper Clause to a categorical prohibition on in-home conduct. While the enumerated powers invoked differ, the intervening constitutional standard cannot.

But this Court's precedents already require attention to the enumerated power, its legitimate end, genuine means-end fit, independent propriety and federalism, and a limiting principle that prevents incidental authority from becoming general police power.

The consequences are concrete. *McNutt v. U.S. Dep't of Justice,* 173 F.4th 204 (5th Cir. 2026), invalidated the same prohibition sustained below, while related disputes involving firearms, tax regulation, treaty implementation, and corporate disclosure confirm that courts are struggling with what Necessary and Proper requires across enumerated powers.

Goldwater's experience with home-based businesses and cottage industries shows why this structural boundary matters in practice. Home production and home enterprise are traditional subjects of state and local police power. States can regulate genuine health, safety, nuisance, traffic, and neighborhood concerns while permitting peaceful productive activity in the home. If Congress may instead prohibit home production whenever a product is federally taxed, resembles a product sold in interstate commerce, or might substitute for a commercial purchase, then little remains of limits on federal regulatory reach. The result of that theory would be to give the federal government what it emphatically lacks: "a plenary police power that would authorize enactment of every type of legislation." *United States v. Lopez*, 514 U.S. 549, 566 (1995). The Constitution's federalism limits protect not merely States as institutions but citizens whose first steps into productive economic life often begin in kitchens, garages, workshops, and spare rooms.

The Court should grant both questions presented. This case offers a rare opportunity to reaffirm that the Necessary and Proper Clause means the same thing regardless of the enumerated power Congress invokes and to provide lower courts with a coherent and reliable framework that preserves Congress's legitimate incidental authority without allowing that authority to become a general federal police power.

ARGUMENT

I. The Court Should Grant Both Questions to Clarify the Uniform Necessary and Proper Standard That Governs Congress's Incidental Powers.

Certiorari on both questions is warranted here because this case presents the opportunity to correct asymmetries in the lower courts by applying the Necessary and Proper Clause to two different enumerated powers in tandem. The Government presents two theories—one grounded in the Taxing Power, the other in the Interstate Commerce Power—that both depend on the same intervening constitutional standard: the Necessary and Proper Clause. Granting review here lets the Court correct the inconsistent application of that Clause identified above, and do so in a single case, rather than resolve one theory now and leave the other for some future case testing the Clause under a different methodology.

It is the Necessary and Proper Clause, in both instances, that the Government asks this Court to treat as bridging the gap between an enumerated power and a prohibition that power does not itself contain. Neither power, standing alone, authorizes a categorical prohibition: no tax is collected through an outright ban on at-home activity, and making liquor for one's at-home consumption is not interstate commerce. *See, e.g., Raich*, 545 U.S. at 34 (Congress's authority to reach intrastate, noncommercial conduct derives not from the Commerce Clause standing alone, but "from the Necessary and Proper Clause") (Scalia, J., concurring). It is the Necessary and Proper Clause, in both instances, that the Government asks this Court to treat as bridging the gap between an enumerated power and a prohibition that power does not itself contain. Both theories therefore ask the identical question: is this prohibition a necessary and proper incident of the power invoked? Granting certiorari lets the Court answer that question once, under a single standard, instead of twice under two.

A. The Constitution supplies one Necessary and Proper Clause, but courts have applied its standard with strikingly different levels of rigor.

The Necessary and Proper Clause applies to "all laws which shall be necessary and proper, for carrying into execution the foregoing powers"—without differentiating among Congress's enumerated powers. *McCulloch,* 17 U.S. (4 Wheat.) at 344. *McCulloch*, rejected Maryland's argument that "necessary" means "absolutely necessary" or "indispensable," but at the same time denied that the Necessary and Proper Clause gives the federal government limitless power. Instead, it supplied the formulation that has governed ever since: "Let the end be legitimate, let it be within the scope of the constitution, and all means which are appropriate, which are plainly adapted to that end, which are not prohibited, but consist with the letter and spirit of the constitution, are constitutional." *Id.* at 421.

This language is not a blank check; it requires a consistent and rigorous inquiry into both necessity and propriety when Congress invokes its incidental power, including whether the asserted means respects the federalist structure embodied in the Constitution's division of national and state authority.

Policing this limitation is critical because of a fear that was central to the debate over the ratification of the Constitution. Anti-Federalists expressed concern that this Clause's broad wording would empower the federal government to "annihilate all the state governments, and reduce this country to one single government," Brutus I, *in* 1 *Debate on the Constitution* 169 (Bailyn ed., 1993)—or that "there is not [any power] which ingenuity may not torture into a *convenience* in some instance *or other*; to *some one* of so long a list of enumerated powers," Thomas Jefferson, Opinion on the National Bank, *in Jefferson: Writings* 419 (Peterson, ed., 1894). But Federalists replied that there was no need for such concern because the government would be one of limited and enumerated powers, while "[t]he powers reserved to the several states will extend to all the objects, which, in the ordinary course of affairs, concern the lives, liberties and properties of the people," *Federalist* No. 45 at 313 (J. Cooke ed., 1961) (Hamilton), and reassured the people that if Congress intruded on such matters, those efforts would be treated as "acts of usurpation" and therefore void. *Id.* No. 33 at 207 (Hamilton).

Under the principle of *contra proferendum,* it is appropriate to read the Constitution so as to effectuate the *reassurances* that led Americans to set aside Anti-Federalist fears and ratify the Constitution. The Necessary and Proper Clause is therefore best implemented by recognizing it as articulating a fiduciary-type relationship that limits the discretion of the agent to serving the principal's goals without exceeding the scope of expressly granted authority. *See, e.g.,* Natelson, *The Legal Origins of the Necessary and Proper Clause,* in *The Origins of the Necessary and Proper Clause* 52 (Lawson, et al., eds., 2010).

True, some of this Court's decisions have been interpreted as asking chiefly whether Congress rationally regarded a measure as useful. *See, e.g., Raich*, 545 U.S. at 22; *Comstock*, 560 U.S. at 134; *Sabri*, 541 U.S. at 605. But rational relationship cannot exhaust the inquiry. If it did, that would effectively eliminate all meaningful checks on federal authority. What's more, it would clash with *McCulloch*'s statement that a statute is only proper if it is "consist[ent] with the letter *and spirit* of the constitution." 17 U.S. (4 Wheat.) at 421 (emphasis added). By "spirit," the Court plainly meant that the Clause must not be exploited in a manner contrary to the Constitution's broader commitment to values such as federalism. *See* Lawson & Granger, *The "Proper" Scope of Federal Power: A Jurisdictional Interpretation of the Sweeping Clause*, 43 Duke L.J. 267, 297 (1993) ("an executory law [must] conform to the 'proper' allocation of authority within the federal government … the 'proper' scope of the federal government's limited jurisdiction with respect to the retained prerogatives of the states.").

NFIB, *supra*, made clear that even a measure Congress considers "necessary" may be "improper" if it illegitimately expands federal authority. 567 U.S. at 560. In *Kebodeaux,* Chief Justice Roberts reiterated that the Clause cannot be read as if it granted some "great substantive and independent power" independent of the Constitution's enumeration. 570 U.S. at 402–03 (Roberts, C.J., concurring). And *Landor* tied the challenged measure to the enumerated power itself, not merely a statutory program's objectives. 146 S. Ct. at 1946. Necessity and propriety thus remain distinct, with federalism integral to propriety.

Comstock illustrates both the source of the present instability and why its deferential language should not be mistaken for the rule. Although *Comstock* used the phrase "rationally related," its holding did not rest on bare rationality. 560 U.S. at 134. Instead, it determined propriety by examining such considerations as the long history of federal involvement in the relevant area; the reasons Congress had for enacting the statute; the statute's accommodation of state interests; and the statute's narrow scope and non-attenuated link to an enumerated power. *Id.* at 143-49.

Unfortunately, some lower courts have seen this not as a mandatory test, but as merely a list of "reasons." *United States v. Carel,* 668 F.3d 1211, 1219-20 (10th Cir. 2011). And other lower courts have substituted their own reasoning while leaving behind the considerations that actually constrained the *Comstock* decision.

But this Court need not create a new test to correct that drift. Its precedents already require courts to ask five recurring questions: (1) what enumerated power is being carried into execution; (2) what legitimate constitutional end that power serves; (3) whether the challenged means is genuinely adapted to that end; (4) whether the means is "proper"—especially considering the impact on federalism; and (5) what principled limit prevents incidental authority from becoming general legislative power. These principles must be applied together, consistently, and with equal force regardless of which enumerated power Congress invokes.

B. Lower courts have failed to faithfully apply the test.

Unfortunately, lower courts have failed to apply this Court's Necessary and Proper framework faithfully. Although they routinely cite *McCulloch*, they do not consistently give effect to all of its requirements. Some have effectively reduced "necessary and proper" to a mere rational-relationship inquiry, while others have treated adaptation, propriety, federalism, and the risk of a general police power as independent constitutional limitations.

The Second Circuit reduced *McCulloch*'s "plainly adapted" formulation, "in effect," to rational-relationship review. *United States v. Lue*, 134 F.3d 79, 84 (2d Cir. 1998).[2] In *Carel*, the Tenth Circuit recited *McCulloch* and *Comstock,* but applied a "reasonably adapted" and "rationally related" inquiry, treating several intervening logical steps as nondeterminative. 668 F.3d at 1219-20, 1223-24.

Other courts take a more demanding approach. *McNutt*, for example, required the challenged home-distilling prohibition to be "plainly adapted" to the Taxing Power and separately considered whether it was "proper" in light of federalism and the absence of a general federal police power. 173 F.4th at 218-22. *NFIB* and *Landor* likewise demonstrate that necessity alone cannot answer the question: a measure must remain an appropriate

2. *Lue* lamented that any more rigorous analysis would amount to "thoroughgoing judicial involvement in the day-to-day enactments of Congress." *Id.* But judicial involvement is necessary to prevent federal power from exceeding its constitutional boundaries.

incident of the enumerated power itself and consistent with the structural limits on federal authority.

C. Applying the common standard to taxation shows that the Sixth Circuit upheld a police regulation Congress cannot justify as incidental to the Taxing Power.

Applied under the full *McCulloch* framework, the home-distilling prohibition cannot be sustained as an incident of Congress's Taxing Power. Congress may lay and collect taxes on distilled spirits, but the challenged law does not tax home distilling, facilitate payment of a tax, or bring home distillers within a revenue-collection system. It prohibits the activity altogether, including production "in any dwelling house, or in any shed, yard, or inclosure connected with such dwelling house." 26 U.S.C. § 5601(a)(6). That is a poor fit between means and constitutional end. A law designed to collect revenue ordinarily permits the taxable activity to occur and regulates it so that the tax can be assessed and collected. This law instead prevents the taxable activity from occurring at all.

The Fifth Circuit correctly identified that mismatch in *McNutt*, 173 F.4 at 219. Licensing and regulation are naturally adapted to tax collection because they bring producers within the system. Categorical prohibition does the opposite. By contrast, the Sixth Circuit treats any regulatory measure that might make tax administration easier as sufficiently connected to the Taxing Power—in other words, viewing the question simply as a matter of rationality. But *McCulloch* requires more than administrative convenience. It requires (in addition to propriety) that something be *necessary*—i.e., a means genuinely adapted to carrying the enumerated power into execution.

United States v. Dewitt, 76 U.S. (9 Wall.) 41 (1869), confirms that this distinction is constitutional, not semantic. There, the Court rejected a prohibition embedded in a federal revenue statute because its asserted connection to taxation was "too remote and too uncertain" to qualify as "an appropriate and plainly adapted means" of carrying the taxing power into execution. *Id.* at 44-45. The Government's theory here suffers from the same defect. A categorical ban on home production is not transformed into a revenue measure merely because Congress can hypothesize that prohibition may reduce evasion somewhere in the tax system.

The prohibition also fails the independent requirement of *propriety*. If Congress may criminalize wholly local conduct whenever that conduct could make enforcement of a federal tax more difficult, the Taxing Power becomes a gateway to regulation of virtually any activity that occurs beyond the Government's immediate view. That would plainly be inconsistent with the "spirit" requirement of *McCulloch*. During the ratification debates, Anti-Federalists warned that the Taxing Power combined with the Necessary and Proper power would cause the federal government to

> introduce itself into every corner of the city, and country … [I]t will enter the house of every gentleman, watch over his cellar, wait upon his cook in the kitchen, follow the servants into the parlour, preside over the table, and note down all he eats or drinks; it will attend him

> to his bed-chamber, and watch him while he sleeps … it will penetrate into the most obscure cottage; and finally, it will light upon the head of every person in the United States … and … the language in which it will address them, will be GIVE! GIVE!

Brutus VI, *in* 1 *Debates, supra* at 617. To this, the Constitution's defenders replied that such fears were exaggerated, and that if the Federal government truly sought to interfere in matters properly assigned to the states, it would be "evident that in making such an attempt it had exceeded its jurisdiction"; indeed, such fears were so overblown that only people misled by "impudent zeal" could possibly dream up such concerns. *Federalist* No. 33, *supra* at 206.

Yet here, the Government's arguments truly would accomplish what Brutus warned about. Its rationale could reach home businesses, remote work, informal sales, household manufacturing, or any other activity that might conceal taxable income or goods. That alone is enough to suggest that it fails the "propriety" requirement, as *McNutt* recognized. 173 F.4th at 221.

This is not incidental tax enforcement. This is general police power. And if *NFIB* makes nothing else clear, it's that the Necessary and Proper Clause cannot be used to acquire a "great substantive and independent power" that the Constitution otherwise withholds. 567 U.S. at 561 (quoting *McCulloch*, 14 U.S. (4 Wheat.) at 411).

D. Certiorari is also warranted to address the Commerce Clause question.

The Commerce Clause inquiry is no different. If Congress may prohibit home production merely because similar goods are sold interstate, because home production might reduce commercial purchases, or because leaving household production unregulated could create a "gap" in a broader federal scheme, the asserted power would have no meaningful stopping point. Home baking, gardening, brewing, sewing, furniture-making, repair work, and countless other forms of household production all substitute, in *some* measure, for goods or services available in interstate markets. A constitutional theory that reaches them all is not incidental commerce regulation. It is general police power.

That is why *Raich* cannot be permitted to operate as an exception to the Court's otherwise uniform Necessary and Proper jurisprudence. To the extent that its comprehensive-scheme theory allows Congress to regulate local conduct under the Commerce Power without the rigorous inquiry into adaptation, propriety, federalism, and other limiting principles that *McCulloch*, *NFIB*, *Kebodeaux*, and *Landor* require elsewhere, *Raich* should be narrowed or overruled. The same Necessary and Proper Clause governs both, after all, and it should impose the same constitutional discipline on both.

The simple answer is that *Raich* cannot operate as a Commerce-specific exception to the uniform law of incidental powers. Its comprehensive-scheme reasoning cannot sustain regulation that would fail the full *McCulloch* inquiry under another enumerated power.

NFIB, *Kebodeaux*, and *Landor* confirm that the Clause remains a structural limitation in every setting.

The need for clarification is not theoretical, but concrete. Numerous cases in the lower courts are wrestling with these questions, and are doing so in far more complicated settings. *United States v. Squire*, 182 F.4th 481 (5th Cir. 2026) (per curiam), for example, is seeking to address these questions in the more complex realm of firearms regulation, as is the District Court in *Silencer Shop Foundation v. Bureau of Alcohol*, No. 6:25-CV-056-H, 2026 WL 2255460 (N.D. Tex. Aug. 5, 2026). In litigation over the Corporate Transparency Act, such as *National Small Business United v. Bessent*, No. 25-1201 (petition for cert. pending), the Government has shifted between taxing and commerce theories to support a regulation not naturally falling within either power. *See National Small Business United v. Yellen*, 721 F. Supp.3d 1260, 1281 (N.D. Ala. 2024), *rev'd*, 161 F.4th 1323, 1327-28 (11th Cir. 2025).

Worthy as those cases are for review, this case offers a cleaner vehicle that avoids the complex regulatory realms of firearms, national-security, corporate-regulation, and narcotics contexts. It presents simple home production and two enumerated-power theories dependent on the same constitutional bridge.

More importantly, this petition presents the issues in a most useful posture. The Sixth Circuit upheld the home-distilling prohibition as necessary and proper to Congress's Taxing Power, while the Government has preserved its alternative contention regarding Congress's Commerce Power. Pet. 13–15. The Court therefore has before it, in a single case, two asserted applications of the same constitutional clause to the same prohibition on the same conduct. Granting both questions would enable the Court to do what lower courts increasingly need it to do: apply a single Necessary and Proper standard consistently across two different enumerated powers.

Limiting review to the Taxing Power would squander that opportunity. If the Court rejects the Sixth Circuit's reasoning but leaves the Commerce Clause theory unresolved, the same prohibition may return to the lower courts, where the Government will again argue that a more permissive understanding of incidental power governs because Commerce rather than Taxation supplies the enumerated end. The result would preserve the very instability this case is uniquely positioned to resolve. The Necessary and Proper Clause does not become more or less demanding depending on the power Congress places before it. Both theories should therefore be considered together.

II. Home-based enterprise shows why the Constitution's limits on federal power leave local matters at the local level.

The federalism principles at issue here do not concern "states' rights." They concern the Constitution's allocation of power between a Federal Government of "few and defined" powers and States that retain "numerous and indefinite" powers over "all the objects which, in the ordinary course of affairs, concern the lives, liberties, and properties of the people." *Federalist* No. 45, *supra* at 313. That distinction matters, especially inside the home.

States across the country have concluded that peaceful home-based economic activity should be protected even against regulation by municipal governments. States are well positioned to draw those lines, balancing the need for regulation against the economic liberty of citizens. An expansive federal police power would frustrate the constitutional division of authority and throw such matters into disarray—a disarray that could be managed only in a distant federal capital which will have little familiarity with local matters.

Home-based businesses have been commonplace throughout American history. They remain important because the home allows a person to begin earning a living or pursuing productive activity without first assuming the costs associated with commercial premises and large-scale regulatory compliance. Home-based businesses account for half of *all* small businesses. *Frequently Asked Questions*, U.S. Small Business Administration (Sept. 2019).[3] And studies show that they generate more than $400 billion in annual revenue. Ben Gran, *Shocking US Home Based Business Statistics*, Incfile Blog (Mar. 21, 2017).[4]

While obviously federal regulation of interstate commerce must take small businesses, including home-based businesses, into account the pervasiveness of home-based businesses makes federal regulatory authority a

3. https://advocacy.sba.gov/wp-content/uploads/2019/09/Frequently-Asked-Questions-Small-Business-2019-1.pdf.

4. https://web.archive.org/web/20190211143723/https://www.incfile.com/blog/post/shocking-us-home-based-business-statistics/.

dangerous prospect, one that runs the risk of empowering federal agencies to reach pervasively and constantly into private homes, which are places of "unique sensitivity." *United States v. Reed*, 572 F.2d 412, 422 (2d Cir. 1978). This concern became particularly acute in 1999, when the Occupational Health and Safety Administration was asked whether its regulations of workplaces would apply to home-based offices. It replied that it had authority over "work performed by an employee in any workplace within the United States, including a workplace located in the employee's home," which meant, among other things, that "if work is performed in the basement space of a residence and the stairs leading to the space are unsafe, the employer could be liable." Letter of Nov. 15, 1999 to T. Trahan, OSHA Archive.[5] This letter sparked a national outcry that led the agency to promise it would not start inspecting home offices. *See* Koch, *Home Offices Protected under Workplace Rules; Employers Object*, CNN (Jan., 4, 2000).[6]

The agency made that promise to defray public outrage over the absurdity of its extreme assertion of authority. Yet this example only helps illustrate the basic fact that expansive federal regulatory power—especially under the theory that miniscule transactions can be regulated as part of a "comprehensive scheme"—risks precisely the outcome the Constitution was not supposed to accomplish. If Congress may categorically prohibit an in-home activity because doing so is convenient to federal tax administration, or because a commercially produced

5. https://www.osha.gov/laws-regs/standardinterpretations/1999-11-15.

6. https://www.cnn.com/2000/US/01/04/home.office/.

analogue moves in interstate commerce, the Federal Government may settle for the entire nation questions that the Constitution leaves outside its plenary control. Home-baked bread substitutes for bread sold in interstate commerce. Home-grown vegetables substitute for supermarket produce. Handmade furniture substitutes for manufactured furniture. If that sort of substitution is enough to make regulation or prohibition of the home-based business activity necessary and proper, nearly every productive act inside the home becomes potentially federal.

A rigorous and uniform Necessary and Proper inquiry preserves Congress's legitimate ability to carry its enumerated powers into execution while preventing those incidental powers from becoming plenary ones. Federalism preserves the Constitution's allocation of authority by withholding from the Federal Government powers it was never granted. When Congress reaches beyond an enumerated power to regulate wholly local conduct, the problem is not merely that a State has lost a preferred policy choice. It is that the Federal Government has exercised a police power the Constitution does not give it.

CONCLUSION

This Court should *grant* both questions presented.

Respectfully submitted,

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