IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

TROPICAL CHILL CORP., et al. Plaintiffs v. HON. PEDRO R. PIERLUISI URRUTIA, et al. Defendants	CIVIL NO. 21-1411 (RAM)

SURREPLY TO PLAINTIFFS' REPLY TO OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION

TO THE HONORABLE COURT:

COMES NOW the Department of Justice of the Commonwealth of Puerto Rico, on behalf of Defendants **Hon. Pedro R. Pierluisi-Urrutia**, in his official capacity as Governor of Puerto Rico, and **Dr. Carlos R. Mellado-López**, in his official capacity as Secretary of the Department of Health, without waiving any right or defense arising from Title III of PROMESA and the Commonwealth's Petition under said Title or under this case, without submitting to the Court's jurisdiction, represented by the undersigned counsel and respectfully serves notice as follows:

I. INTRODUCTION

On October 4, 2021, Plaintiffs filed a motion styled *Reply to Opposition to Motion for Preliminary Injunction* ("Reply"). *See* Docket No. 29. At Defendants' request, the Court

authorized the filing of a sur-reply for Defendants to state their position and address some of the issues raised by Plaintiffs in their Reply.

On the legal grounds set forth in this motion and in Defendants' *Memorandum in Opposition to Motion for Preliminary Injunction* ("Opposition") (Docket No. 20), the Court should deny Plaintiffs' request for a Preliminary Injunction due to the lack of sound and meritorious legal arguments in their Reply to Defendants' Opposition (Docket 29), as well as their *Motion for Preliminary Injunction* (Docket No. 7).

In this motion, Defendants will address the most important legal issues raised by Plaintiffs in their Reply so as to establish Plaintiffs' unlikelihood of success on the merits and, thus, their request for preliminary relief should be denied.[1]

II. LEGAL ANALISIS

A. Regulation 138-A rationally advances the Commonwealth's legitimate interests in promoting vaccines against COVID-19.

Plaintiffs alleged that Defendants' Opposition ignored their contention that Regulation 138-A is arbitrary and capricious. (*See* Docket No. 29 at 3). However, nothing is further from the truth. In Defendants' Response, it was duly argued that the Secretary of Health, in the valid exercise of his authority, determines when and under what circumstances and exceptions to issue health certificates. *See Great A. & Pac. Tea Co., Inc. v. Cottrell*, 424 U.S. 366, 371 (1976) (holding that the states retain "broad power" to legislate protection for their citizens in matters of local concern such as public health). The Commonwealth of Puerto Rico has a legitimate interest in promoting vaccines against COVID-19. In fact, Plaintiffs concede to the effectiveness of the COVID-19

[1] A Motion to Dismiss (Docket No. 18) had been filed by Defendants duly addressing and discussing most, if not all, of the legal grounds discussed in the motions dealing with the preliminary injunction, which was pending before the Court at the time Plaintiffs moved to amend their pleadings (Docket No. 35).

vaccines. (*See* Docket No. 35 at 34). Accordingly, it is undisputed that the Secretary of Health has a legitimate interest in promoting vaccination against COVID-19 to fight the spread of the disease and preventing deaths and hospitalization that would create a more fragile health system.

At the outset, it is important to highlight that Plaintiffs did not challenge the Secretary of Health's broad powers in matters of public health. Notwithstanding the above, Plaintiffs contend that requiring proof of vaccination to obtain a health certificate is wholly irrational because one can be vaccinated and still get sick and spread COVID-19. (*See* Docket No. 29 at 4). However, this is dangerously misleading because the Center for Disease Control and Prevention has unequivocally stated that "Getting vaccinated is the best way to slow the spread of COVID-19 and to prevent infection by Delta or other variants."[2] Clearly, requiring vaccination proof as part of the requirements to receive a medical certificate rationally advances its legitimate interests. Additionally, Plaintiffs' reasoning does not make sense when applying it to the other requirements in Regulation 138 that have been valid and unchallenged since its promulgation. Specifically, Regulation 138 requires a medical evaluation, the results of in vitro tuberculin or tuberculosis and serological test for syphilis. Any person that requests a medical certification and opposes or fails at any of these requirements will not be able to obtain a medical certificate. There never has been any opt outs for those requirements. But, in Regulation 138-A, there are two exceptions for the COVID -19 vaccine: one for health reasons and the other for religion. Why would the requirement for vaccination against COVID-19 be any different from requiring a tuberculosis test or serological test for

[2] https://www.cdc.gov/coronavirus/2019-ncov/vaccines/effectiveness/work.html

syphilis? All those requirements advance the states legitimate interest in public health. In fact, tuberculosis and syphilis are not currently as deadly as COVID -19 and they are still being required to obtain a medical certificate. Consequently, no public benefit is being denied on account of the exercise of a right guaranteed by the Constitution. Plaintiffs' logic follows that just because COVID-19 cases have been going down then the Secretary of Health can no longer advance its legitimate interest in keeping the COVID-19 cases low and avoid another wave like the one we saw recently in July throughout August of 2021.

Defendants concur with Plaintiffs' legal citing of *Mulero-Carrillo v. Román-Hernández*, 790 F.3d 99, 107 (1st Cir. 2015) that "for both equal protection and substantive due process, when plaintiffs do not allege that a fundamental right is affected, they are required to show that the governmental infringement is not rationally related to a legitimate government purpose". Accordingly, just like in *Mulero-Carrillo*, Defendants posit that Plaintiffs have not shown that the alleged governmental infringement of their rights by requiring vaccination of COVID-19 is not rationally related to a legitimate government purpose considering that we are in the midst of a world-wide pandemic. This is especially true when Plaintiffs have conceded on the effectiveness of the COVID-19 vaccines.

B. Under the applicable highly deferential standard of review, plaintiffs have failed to state a claim for deprivation of a liberty interest under the Fourteenth Amendment's substantive due process.

Plaintiffs claim that Defendants, in their Opposition, "invite[d] this Court to apply an outdated standard for [their] substantive due process claims that 'predates modern tiers of scrutiny'", when there are a more recent Supreme Court cases to which they referred

to in their "PI Motion". (*See* Docket No. 29 at 2). The so-called outdated standard is allegedly invoked by Defendants in support of their "absolute powers *beyond judicial review* when implementing their executive orders during a health crisis." (*See* Docket No. 29 at 6). Plaintiffs further argue that Defendants elude "the studies, data, and statistics furnished by Plaintiffs" (*See* Docket No. 29 at 6), information which would allegedly undermine Defendants' justification in imposing the mandates and regulations under attack in this case, even under the allegedly outdated standards of *Jacobson v. Massachusetts,* 197 U.S. 11 (1905).

For starters, Plaintiffs coyly admit in their motion that they "are not advocating that willing citizens (or anyone else) not get vaccinated" (Docket No. 29 at 2); that "economic regulations are subject to rational basis review" (Docket No. 29 at 3); and that "they are not challenging the efficacy of the vaccine in preventing COVID-related hospitalizations and deaths" (Docket No. 29 at 9). Nevertheless, they argue that current statistics as to all relevant metrics of COVID spread in Puerto Rico do not support, even under the most deferential constitutional standards, the admittedly effective measures adopted by Defendants, specifically the vaccination mandates.

Jacobson is pellucidly clear in that "[o]ur Constitution principally entrusts the safety and the health of the people to the politically accountable officials of the States to guard and protect." *S. Bay United Pentecostal Church v. Newsom*, ––– U.S. ––––, 140 S. Ct. 1613, 207 L.Ed.2d 154 (2020) (Roberts, J., concurring) (citing *Jacobson*, 197 U.S. at 38, 25 S.Ct. 358) (internal quotations omitted). When ruling upon its scope and current doctrinal vitality as applicable to controversies arising during the COVID-19 epidemic, lower federal courts have held that "[a]ccordingly, although courts generally have

jurisdiction over constitutional challenges to public health measures, the standard of review is **highly deferential**. To invalidate an elected officials' action in response to a public health crisis, "a plaintiff must show either (1) that it has 'no real or substantial relation' to protecting public health, or (2) that it is **'beyond all question, a plain, palpable invasion of rights secured by the fundamental law**.'" *Stewart v. Justice*, 502 F.Supp.3d 1057, 1062-1063 (S.D. West Va, 2020) (emphasis added) (quoting *Jacobson)*. The District Court in *Stewart* was very clear in that "[a]lthough *Jacobson* is more than a century old, recent case law shows that it is still good law", *Id*. at 1063; *see also Antietam Battlefield KOA v. Hogan,* 461 F.Supp.3d 214, 228 (D.Md. 2020) ("Since the challenged orders are public health measures to address a disease outbreak, *Jacobson* provides the proper scope of review") (quoted in *Stewart*, at 1063).

In short, there is "apparent consensus" that *Jacobson* applies to constitutional challenges to COVID-19 related restrictions, *see Stewart*, at 1063, and that it sets a deferential standard, which calls for judicial intervention only when there is no real or substantial relation between the restrictions and the protection of public health, or "a plan and palpable invasion of rights secured by the fundamental law", *Jacobson* at 31 (quoted in *Stewart*, at 1063). Doctrinal wishful thinking aside, this call for deference to health authorities directly undermines Plaintiffs' invitation for this Court to step into a numerical farrago of statistical obscurity, crafted to lead the court to conclude that no public health justification exists for the challenged vaccination mandates. Even, arguendo, if some of the statistics Plaintiffs laid out were to support their argument that the COVID-19 situation is not as dangerous and lethal as authorities proffer, "the existence of evidence that contradicts the Government's policy does not lead to the conclusion that the Governor's

orders have no rational basis. It is not the Court's role to 'usurp the functions of another branch of government' in deciding how best to protect public health as long as the measures are not arbitrary or unreasonable…, [a]nd when elected officials 'act in areas fraught with medical and scientific uncertainties, their latitude must be specially broad'", *Stewart*, at 1065 (quoting *S. Bay United Pentecostal Church*, *supra*, and *Marshall v. United States,* 414 U.S. 417, 427 (1974)); *see also In Re Abbott*, 954 F.3d. 772, 786 (5th Cir., 2020), vacated on other grounds in 141 S.Ct. 1261 (Mem) ("*Jacobson* instructs that *all* constitutional rights may be reasonably restricted to combat a public health emergency").

In their briefs, Plaintiffs insist that economic rights and economic liberties are protected under the Fourteenth Amendment. (*See* Docket No. 29 at 3). They described as "laughably wrong" Defendants' argument to the contrary and claim there are "plenty of cases upholding economic liberty claims". *Id*. For some strange reason, Plaintiffs found no space in their 32-page allocution to include the names or citations of such an abundant harvest of relevant case law. Current precedents do not support their proposition. "[A]n assertion of a "general right to do business" has not been recognized as a constitutionally protected right by the Supreme Court." *See Stewart*, at 1067-1068; *see also College Savings Bank v. Florida Prepaid Postsecondary Education Expenses Board*, 527 U. S. 666, 675 (1999) (finding that "business, in the sense of the activity of doing business, or the activity of making a profit is not property in the ordinary sense", finding no deprivation of property under the Fourteenth Amendment).

In summary, the absence of an economic liberty interest duly recognized by relevant case law and in light of the standard of rational scrutiny and deference to public

authorities as clearly supported by the text of *Jacobson* must lead the Court to the conclusion that Plaintiffs have failed to state a claim for deprivation of a liberty interest under the Fourteenth Amendment to the US Constitution and, thus, they are not likely to prevail on the merits in this case.

C. Plaintiffs' inarticulate arguments do not support Vega's RFRA claim.

On the general subject of the religious exemptions, Plaintiffs claimed "the government is purposely deceiving the public into believing that *only* those with religious beliefs and medical conditions may choose to undergo the weekly test process instead of vaccination." (*See* Docket No. 29 at 5). However, a simple reading of the Executive Order sounds the death knell of Plaintiffs' erroneous proposition. Plaintiffs' argument rests on the premise that Defendants are intentionally concealing or misrepresenting the contents of the Executive Order, which is clearly at odds with the publication and dissemination of the contents of the Order. Plaintiffs failed to refer in their motion to a single public statement by Defendants, or which reasonably could be attributed to Defendants, in support of such an elaborate deception scheme. Their silence is beyond eloquent. Plaintiffs' argument is not clear either on how such alleged deception supports Vega's RFRA claim.

Plaintiffs also claim the government's actions are "forcing Plaintiff Vega to violate her deeply held religious beliefs by having to participate in a process that she considers immoral." (*See* Docket No. 29 at 6). The process they refer to is the requirement for her to request from her would-be-guests a "plainly unconstitutional religious affidavit" (*id.*), an "extremely burdensome means" (*id.*), which according to Plaintiffs is constitutionally unacceptable given the existence of other means.

As Defendants explained in their Opposition, the challenged Executive Orders provide a medical and religious exemption, which may not even be constitutionally required, in which case Plaintiff Vega has the option to require a COVID-19 negative test result to respect her client's free exercise of religion and provide an alternative to those whose religious beliefs lead them to reject vaccination. Under that scenario, the Executive Orders not only safeguard free exercise of religion but provide more rights than those constitutionally or statutorily required. Far from infringing RFRA or a free exercise of religion in any meaningful way, the Executive Orders take into account religious beliefs by creating a religious exception to the vaccine mandate. As an alternative, the Order allows Plaintiff Vega to require a negative COVID-19 test result to all her guests. Even though neither the Constitution or RFRA require a religious exception to vaccine mandates, the Executive Orders still created an alternative to short-term rental businesspersons like Plaintiff Vega—requiring a negative COVID-19 test result in lieu of a Vaccination Record Card—that constitute a less restrictive mean and that is narrowly tailored to advance the compelling government interest of containing the COVID-19 deadly virus from spreading. Plaintiffs' allegations fail to state a claim under RFRA.

Even if the Executive Orders were to substantially burden Plaintiffs' religious practice, a proposition for which there is no factual support in their pleadings, it would still comply with a strict scrutiny review because these measures were adopted to advance a compelling state interest related to public health. The Supreme Court has already found that "stemming the spread of COVID-19 is unquestionably a compelling interest." *Roman Catholic Diocese of Brooklyn*, 141 S.Ct. at 67. Stopping the spread of a lethal transmissible disease is unquestionably a compelling interest and vaccinations are the

best way to reach that goal. As to the appropriateness of the means, "the government should not be required 'to refute every conceivable option in order to satisfy the least restrictive means prong of RFRA.'" *Armstrong v. Jewell*, 151 F.Supp.3d 242, 249 (citing *United States v. Wilgus*, 638 F.3d 1274, 1289 (10th Cir.2011) (listing concurring cases from other jurisdictions).

In summary, when adopting the Executive Orders and the verification requirements contained therein, the Government complied with the "least restrictive means" requirement of RFRA, being that the Executive Order provides alternatives for Airbnb owners compliance with its dispositions by conforming with Sections 5 and 6. Specifically, Section 5 of EO 2021-62 allows for an exception to be inoculated due to religious beliefs for owners, employees, and guests. To apply for the exception based on religion, an owner, employee or guest must obtain a sworn statement along with their religious leader stating that inoculation goes against their religious beliefs. If they do not have a religious leader to sign the sworn statement, then they must furnish a sworn statement where they sustain their specific and sincere religious convictions. In short, Plaintiff Vega does not state in the pleadings a cognizable violation of the RFRA.

D. The Governor's statutory authority is clearly detailed.

Plaintiffs claim that Defendants never identified in the Opposition the constitutional powers and authority of the Governor. (*See* Docket No. 29 at 17). Defendants clearly stated in detail all the statutes that give the powers and authority to the Governor in emergencies such as the one we are facing now. Specifically, that Article 6.10 of the *Puerto Rico Department of Public Safety* Act, Act 20-2017, P.R. Laws Ann., tit. 25, § 3550, et seq. "constitutes a clear example in which the Legislative Assembly conferred to the

Governor ample faculties to act in protection of public interest in cases of emergency." *Amadeo, et al. v. Pierluisi-Urritia et al.*, Civil No. SJ2021CV04779 (P.R. Court of First Inst. 2021). Likewise, Defendants identified P.R. Laws Ann. tit. 24, § 354 and Act No. 81-1912, expressly recognizing the authority of the Governor to act in an epidemic through executive orders. "Whereby proclamation of the Governor of Puerto Rico an epidemic shall be declared to exist in one or several municipalities, the Secretary of Health, immediately upon such declaration of an epidemic, shall take charge of the municipal sanitation of such municipality or municipalities so affected." 24 L.P.R.A. § 354. Plaintiffs misconstrue Defendants' comment in that COVID-19 pandemic has proven to be difficult for governments into a charge that the Executive Orders are an attempt to obviate the Puerto Rico Uniform Administrative Procedure Act. However, pursuant to Article 6.10 of Act 20-2017, the Governor may (1) "prescribe, amend, and revoke any regulations as well as issue, amend, and rescind such orders as deemed convenient which shall be in effect for the duration of the state of emergency or disaster"; and (2) "render effective any state regulations, orders, plans, or measures for emergency or disaster situations or modify them at his discretion." P.R. Laws Ann. tit. 25, § 3650.

The Governor of Puerto has operated under valid law, pursuant to the specific delegated powers bestowed upon him by the state legislature, delegated powers that have not been challenge by the new legislature that took office in January 2021. Accordingly, Plaintiffs claim that the Governor of Puerto Rico lacks statutory authority misses the mark and should be disregarded by this Honorable Court.

E. Plaintiffs' Reply still fails to adequately allege a non-delegation claims.

Plaintiffs argue that, in rebutting their own arguments in support of their prayer for relief, Defendants never identified the constitutional powers nor the constitutional authority on which the Executive Orders are based. (*See* Docket No. 29 at 17). Instead, Plaintiffs claim that Defendants oversimplified and mischaracterized Plaintiffs' position as to the scenarios whereby Art. 6.10 of Act 20-2017 would be applicable since, according to Plaintiffs, "the governor cannot claim a generic power to do through Act 20-2017 what the Legislative Assembly has particularly delegated to the Health Secretary by providing him with concrete statutory authority to act in epidemic scenarios" *Id.* While they concede that the governor may declare an emergency in case of a pandemic, Plaintiffs posit that "the actual and concrete measures to act upon that emergency are delegated to the Secretary" (*See* Docket No. 29 at 18). Finally, Plaintiffs raise doubts about the extent to which Act 20-2017 contains intelligible principles to guide the use of the power delegated to Defendants and argue that Defendants failed to identify them. (*See* Docket No. 29 at 21).

As Defendants explained in earlier filings, since Act No. 20-2017 is a local statute, Plaintiffs had to, in some meaningful way, rebut the argument that "territorial legislators may exercise the legislative power of the Territories without violating the nondelegation doctrine". *Fin. Oversight & Mgmt. Bd. For Puerto Rico v. Aurelius Inv., LLC*, 140 S. Ct. 1649, 1659, 207 L. Ed. 2d 18 (2020). As previously stated, the plain language of the challenged statute, Article 6.10 of Act No. 20-2017, clearly allows the Governor to "prescribe, amend, and revoke any regulations" and "render effective any state regulations, orders, plans, or measures for emergency or disaster situations or

modify them at his discretion." P.R. Laws Ann. tit. 25, § 3650. The Legislative Assembly unquestionably supplied an intelligible principle to guide the Governor's use of discretion. In fact, Article 6.10 itself sets forth the boundaries of the authority delegated by the Legislative Assembly to the Governor by enumerating the Governor's powers and the events during which he can take those actions— emergencies and disasters. Plaintiffs' arguments ignore the plain meaning of the statute, and their attack on the statute's intelligible principle, stripped from their rhetorical ornaments, have more to do with their preference for a different principle than with the lack of a principle.

As to their reference to the P.R. Supreme Court opinion of *Domínguez Castro v. ELA*, 178 P.R. Dec. 1, 92-94 (2010), the opinion clarified that nothing prevented the Puerto Rico Legislature from establishing general norms that are broad and that leave the executive an adequate margin of freedom to complement the legislative norms using a specialized judgment, which can be developed according to an administrative analysis, appreciation and discretion that has a reasonableness basis. *Domínguez Castro v. E.L.A.*, 178 P.R. Dec. 1, 94, 2010 TSPR 11 (2010). Puerto Rico's Court of First Instance dealt specifically with this subject and ruled upon this controversy in *Amadeo et al. v. Pierluisi-Urritia et al.*, Civil No. SJ2021CV04779 (P.R. Court of First Inst. 2021) (upholding a vaccine mandate for students and school employees in Puerto Rico). *See* **Exhibit I** - CFI *Amadeo* Judgment, pages 18-23. Likewise, the United States District Court for the District of Puerto Rico has stated that:

> The factor, by now clear, is that issues of Puerto Rico law, including constitutional interpretations of local statutes, require a "rigid deference" to the actions of local courts. The case law, discussed above, is full of strongly worded admonishments towards deference that seem to underscore a generalized concern that Puerto Rico, given its mixed law jurisdiction (one of the few still active in the world) has suffered a certain and unnecessary

> amount of disregard towards its juridical roots and processes that cannot be justified in our present federalist system.

Corporación Insular de Seguros v. Garcia, 680 F. Supp. 476, 482 (D.P.R. 1988).

As Defendants stated in their Opposition, current doctrine as espoused by applicable precedents referred to in this motion are not on Plaintiffs' side, nor support their prayer for relief. Therefore, this Court must inevitably conclude that Plaintiffs do not adequately allege a violation of the non-delegation doctrine, since Article 5.10 Act No. 20-2017 is not vague and overbroad, and it includes an intelligible principle to guide the Governor's use of discretion.

F. Legal basis for penalties included in the rolling EOS.

In their Reply, Plaintiffs contend that the Governor does not have legal basis for the penalties included in the Executive Orders. Plaintiffs make this argument even though Article 5.14 of Act No. 20-2017, as amended,[3] does provide for penalties and they are correctly applied in the executive orders 2021 062-064. In an attempt to contradict the clear text language in Article 5.14, Plaintiffs go to a defunct law from 1999. Specifically, Plaintiffs allege, in our view inaccurately, that Article 5.14 of Act No. 20-2017 is the substitute of Section 20 of Act No. 211-1999 and that a disobedience to an executive order is not included in Article 5.14, as was the case under the previous statute. (*See* Docket No. 29 at 23-24). Be that as it may, Defendants contend that this Court should defer to the clear text in Article 5.14 of Act No. 20-2017 in which it unequivocally includes disobedience to an executive order. As a matter of fact, Act No. 66 of 2020 amended Article 5.14 of Act No. 20-2017 to include the disobedience to an executive order.

[3] Note that articles 6.10 and 6.14 of Act No. 20-207 were amended by Act 135 of September 1, 2020, and renumbered as articles 5.10 and 5.14, respectively.

Specifically, Act No. 66-2020 amended Article 5.14 of Act No. 20-2017 "for the purpose of clarifying the scope and parameters of the crime and the penalties established for failing to comply, disrespect or disobey an Executive Order of the Governor of Puerto Rico, having decreed a state of emergency or disaster or implemented a curfew." (Translation supplied). Additionally, in the statement of motives, Act No. 66-2020 stated that "it is necessary that the Chief Executive Officer, the Secretary of Public Security and all emergency response personnel have the necessary tools to provide assistance and protection to citizens. For this mandate to be effective, it is equally important that the people be warned of both the powers of the public security agencies and the prohibited conduct once an emergency or disaster is duly declared by Executive Order." (Translation provided). Accordingly, this Honorable Court should disregard Plaintiffs' erroneous interpretation of Article 5.14 of Act No. 20-2017, because it does provide for penalties, and they are correctly applied in the executive orders 2021 062-064 and no repealed Law from 1999 will change that fact.

III. CONCLUSION

"Slowing the spread of a novel virus that has already killed over 250,000 Americans is a compelling, and at least significant, government interest", *Stewart*, at 1066. Considering such compelling interest, "[g]overnment authorities must have the ability to maintain public health and safety in times of great crises such as these", *Jacobson* at 29 (quoted in *Stewart*, at 1070-1071). Plaintiffs' Reply and the arguments contained therein do not contain arguments to justify a departure from these general norms. On these grounds, their request for provisional relief should be denied by this Court.

WHEREFORE, it is respectfully requested from this Honorable Court that this motion be granted, and that Plaintiffs' Motion for a Preliminary Injunction in this case be denied.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed a digital copy of this document with the Clerk of the Court, who will automatically notify of such filing to all parties officially registered in the CM/ECF System.

In San Juan, Puerto Rico, this 15th day of October 2021.

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