

Supreme Judicial Court
FOR THE COMMONWEALTH OF MASSACHUSETTS
No. SJC-13110

KELLIE PEARSON and THE LAW OFFICES OF MARK BOOKER, Plaintiffs

v.

THOMAS M. HODGSON, in his official capacity as Sheriff of Bristol County,
and SECURUS TECHNOLOGIES, INC., Defendants

On Certification From The Federal District Court
For The District Of Massachusetts
C.A. No. 18-CV-11130-IT

**BRIEF OF *AMICI CURIAE* AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS, MEDIAJUSTICE, AND WORTH RISES**

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INTRODUCTION

Every layer of our criminal legal system “drains money from those least able to afford it and further entrenches economic inequity.”¹ This case is about a Massachusetts Sheriff’s Office that opened that spigot to enrich itself. For a decade, the Bristol County Sheriff’s Office has exploited low-income families seeking to speak with their loved ones incarcerated at Bristol County Correctional Facilities. And, in doing so, it has denied families the opportunity to strengthen their bonds with loved ones incarcerated in Bristol County; to the contrary, the Sheriff’s Office has severed those bonds.

Providing incarcerated people reasonable access to public telephone calls is within the Sheriff’s enumerated duties and required under the law.² Rather than provide such reasonable access, however, in 2011 the Sheriff’s Office entered into a lucrative agreement for site commissions—essentially, legalized kickbacks from providers to facilities—with Securus Technologies, Inc., a correctional telecom provider with yearly revenues in the hundreds of millions of dollars, at the expense of Massachusetts families with incarcerated loved ones. Under that agreement, the Sheriff’s Office gave Securus an exclusive contract to provide calling services to

¹ *Paying for Jail: How County Jails Extract Wealth from New York Communities*, Worth Rises, The Brooklyn Community Bail Fund (Dec. 2019), <https://static1.squarespace.com/static/58e127cb1b10e31ed45b20f4/t/5dfb11f1d92add1f0092b4df/1576735788585/Paying-For-Jail-NY>.

² 103 Mass. Code Regul. § 948.10.

people incarcerated in all Bristol County facilities. In exchange, the Sheriff's Office received 48% of Securus's gross revenues. Securus, in turn, passed the cost of those payments—which bore no relationship to the actual cost of providing telephone calls—onto people behind bars and their loved ones. The agreement nearly doubled phone rates for families with loved ones incarcerated in Bristol County.³

INTEREST OF *AMICI CURIAE*⁴

This brief elaborates the financial burdens of incarceration draws attention to the harmful consequences of a scheme that shifts resources to the Sheriff's Office, away from incarcerated individuals and their loved ones. *Amici* respectfully submit that the full context of this revenue-generating scheme, including its impact on the family members and loved ones of those in custody, might assist the Court in resolving the statutory issues in this case.

Amicus curiae the American Civil Liberties Union of Massachusetts, Inc. (ACLUM), an affiliate of the national American Civil Liberties Union, is a nonprofit organization dedicated to defending civil rights and civil liberties guaranteed by the

³ *Pearson v. Hodgson*, 363 F. Supp. 3d 197 (D. Mass. 2018).

⁴ This brief has not been authored, in whole or in part, by counsel to any party in this appeal. No party or counsel to any party contributed money intended to fund preparation or submission of this brief. No person, other than the *amici*, their members, or their counsel, contributed money that was intended to fund preparation or submission of this brief. The *amici*, their members, and their counsel have not represented any of the parties to the present appeal in another proceeding involving similar issues, nor have they been parties in a proceeding or legal transaction that is at issue in the present appeal.

state and federal constitutions and laws. ACLUM works with community and organizational partners to end over-incarceration; ensure that all people have their basic rights protected regardless of their wealth or income; and strengthen the public's right to hold government officials accountable. ACLUM has been particularly active in working for justice for those ensnared in the criminal legal system.

Amicus curiae MediaJustice is a non-profit organization devoted to advancing communication rights for communities harmed by persistent discrimination and disadvantage. To that end, it launched its Prison Phone Justice Campaign, which pushes for relief from the high price of staying connected to loved ones behind bars. The campaign raises awareness about the exploitative charges of phone calls for incarcerated people and their families and the choices families are forced to make between other needs—like food and power—and regular contact, while phone providers and correctional facilities make huge profits by maintaining these electronic barriers.

Amicus curiae Worth Rises is a non-profit advocacy organization dedicated to ending the exploitation of those touched by the carceral system. In particular, it works to expose the commercialization of the criminal legal system—including extensive work exposing the economic and non-economic harms of unreasonably high fees charged to incarcerated people and their families for phone calls. Worth

Rises also advocates and organizes to protect the limited economic resources of affected communities and, to that end, has helped pass and implement policies for free prison and jail phone calls around the country. It has served as *amicus curiae* in other prison and jail phone justice cases.

ARGUMENT

I. Correctional Telecommunications Is A Highly Lucrative, Concentrated Industry.

Correctional telecommunication companies like Securus make hundreds of millions of dollars each year by charging incarcerated people exorbitant rates for phone calls and other communication. The industry brings in \$1.4 billion in revenue annually on phone calls.⁵ Securus alone rakes in half of that revenue—around \$700 million.⁶

Correctional telecommunications companies are able to accrue these profits in large part because there is little competition in the industry. As of 2013, “three companies—GTL, Securus, and CenturyLink—control[led] 90 [percent] of the state DOC market, either directly or through their subsidiaries.”⁷ Securus and GTL

⁵*The Prison Industry: How it Started. How it Works. How it Harms.*, Worth Rises, 78 (Dec. 2020), shorturl.at/a1469.

⁶ *Id.*

⁷ John E. Dannenberg & Alex Friedmann, *FCC Order Heralds Hope for Reform of Prison Phone Industry*, 24 Prison Legal News, no. 12, Dec. 2013, at 1, 7.

together control a whopping 82 percent of the market.⁸ This concentration weakens incentives to reduce fees and costs to compete for contracts.

But even when correctional telecommunications companies do compete for contracts, the benefits are given to correctional partners, like the Bristol County Sheriff's Office, not to those who are actually paying for the services: incarcerated people and their families. Rather than compete for contracts by offering lower rates for calling, correctional telecommunications companies offer financial incentives to corrections departments in exchange for monopolies over phone calls in individual departments' facilities.⁹ The cost of these incentives does not come out of the telecommunication companies' profits. Instead, the costs are passed on to incarcerated people and their families through higher call prices.¹⁰ That's why, when the Bristol County Sheriff's Office entered into its contract with Securus for 48% of Securus's profits, the prices charged to incarcerated people in Bristol County and their families doubled.

High-cost-per-minute phone calls are not the only way correctional communication companies exploit incarcerated people and their loved ones. These

⁸ *The Prison Industry*, *supra* note 5.

⁹ Drew Kukorowski, Peter Wagner & Leah Sakala, *Please Deposit All of Your Money: Kickbacks, Rates, and Hidden Fees in the Jail Phone Industry*, Prison Policy Initiative (May 8, 2013), <https://www.prisonpolicy.org/phones/pleasedeposit.html>.

¹⁰ *Id.*

companies also charge exorbitant and unnecessary fees to access their services. An estimated 38% of the over one billion dollars spent on calls from prisons each year goes towards fees.¹¹ Prepayment fees, which make up almost 20% of the money spent on phone calls from prison, are particularly pernicious: Prison communication companies charge incarcerated people and their families to add money to their accounts.¹² These companies then limit the amount families can prepay at a given time, requiring them to repeatedly repay the fee to keep in touch with their loved ones.¹³

II. Defendants' Actions Exploited Low-Income People With Loved Ones Who Are Incarcerated.

Incarceration is not only psychologically and physically traumatizing; it is also economically destabilizing for individuals and families already facing economic poverty. The Sheriff Office's scheme to make money off calling services exploits and isolates the most marginalized Massachusetts residents at the precise moment that they most need the support of their loved ones—when they have been physically separated from their families and are adjusting to life behind bars. What's more,

¹¹ *Id.*

¹² Rosalie Chan & Belle Lin, *The high cost of phone calls in prisons generates \$1.4 billion a year, disproportionately driving women and people of color into debt*, Insider (June 30, 2021, 9:30 AM), <https://www.businessinsider.com/high-cost-prison-communications-driving-debt-racial-wealth-gap-2021-6>.

¹³ *Id.*

many of those impacted by this agreement are being held pre-trial, and have therefore not been convicted of any crime—and may never be.

People behind bars in Massachusetts overwhelmingly enter the criminal legal system from financially impoverished backgrounds. Incarcerated people have a median annual income of \$19,185 at the time of their arrest—41% below the median at a similar age group.¹⁴ An estimated 80% to 90% of people facing criminal charges in the United States are indigent, up from an estimated 43% in the 1960s.¹⁵

Contact with the criminal legal system compounds poverty and intensifies the need for financial resources—incarceration brings innumerable financial burdens for families even beyond the cost of phone calls at issue in this case. For starters, families who want to avoid the high cost of phone calls have few inexpensive options for staying in touch with loved ones. An e-mail to or from a person in a Massachusetts prison starts at \$.25 and a video call (billed per 20-minutes) incurs a \$12.99 fee¹⁶—services that most of us in the free world access for free. Incarcerated

¹⁴ Bernadette Rabuy & Daniel Kopf, *Prisons of Poverty: Uncovering the pre-incarceration incomes of the imprisoned*, Prison Policy Initiative (July 9, 2015), <https://www.prisonpolicy.org/reports/income.html>.

¹⁵ Donald J. Farole, Jr., & Lynn Langton, *County-Based and Local Public Defender Offices, 2007*, Bureau of Justice Statistics (Sep. 2010), <http://www.bjs.gov/content/pub/pdf/clpdo07.pdf>; Paul D. Butler, *Poor People Lose: Gideon and the Critique of Rights*, 122 Yale L.J. 2176-2204 at nn. 17–20 (2013).

¹⁶ Karina Wilkinson, *Massachusetts Prison and Jail Phone and Video Rates Background Sheet*, Prison Policy Initiative (Sept. 2021), https://www.prisonpolicy.org/scans/mass_contracts/ma_prison_and_jail_phone_rates_fact_sheet.pdf; Charles N. Diorio, *Massachusetts Prisons, E-mails, Internet, and*

people also pay for every stamp they need to send mail and every piece of stationery to write on. Because these means of communicating are essential to the health and wellbeing of incarcerated people as well as their families and loved ones, they are expenses that many have no choice but to endure.¹⁷

Incarcerated people are also forced to rely on purchases at a facility's commissary to meet their basic needs—especially food, which represents the vast majority of spending in commissaries.¹⁸ In Massachusetts, almost 80% of money spent at commissaries goes to food and beverages to supplement the notoriously “small portions of unappealing food” served in jail and prison cafeterias.¹⁹ Indeed, people incarcerated in Bristol County have reported that meals were “inedible or too small, pushing them to rely on high-priced snacks from the commissary.”²⁰ An investigation into the food at Bristol County's correctional facilities “found expired

the Green New Deal, Prison Journalism Project (Aug. 10, 2021), <https://prisonjournalismproject.org/pjp-stories/massachusetts-prisons-emails-internet-and-the-green-new-deal>.

¹⁷ Creasia Finney Hairston, *Family Ties During Imprisonment: Important to Whom and for What?*, 18 J. Socio. & Soc. Welfare 87 (1991).

¹⁸ Stephen Raher, *The Company Store: A Deeper Look at Prison Commissaries*, Prison Policy Initiative (May 2018), <https://www.prisonpolicy.org/reports/commissary.html>.

¹⁹ *Id.*

²⁰ Jeanette Barnes & Michael Bonner, *Crime and Nourishment: An Inside Look at Jail Food in Bristol County*, South Coast Today (Dec. 15, 2021 9:33 PM), <https://www.southcoasttoday.com/news/20181215/crime-and-nourishment-inside-look-at-jail-food-in-bristol-county>.

food in the pantry” and “no fresh fruits or vegetables”;²¹ following the investigation, Bristol County began providing two apples per week to those in its custody.²² And while the Sheriff’s Office rakes in profits off the calling system, it certainly is not investing that cash in necessities for those in its custody; Bristol County’s per-person costs on food are the lowest in the state.²³

Another major category of commissary spending is hygiene products, like toilet paper, antacid tablets, vitamins, hemorrhoid ointment, antihistamine, shower sandals, and eye drops.²⁴ In 2016, for example, people in Massachusetts prisons “purchased over 245,000 bars of soap, at a total cost of \$215,057”—even though they supposedly receive one free bar of soap per week.²⁵ Even toilet paper is not always a guarantee; one person incarcerated in Massachusetts reported that he was sent to solitary confinement because he asked for an extra roll.²⁶ As a result, an incarcerated person in Massachusetts spends on average \$1,207 per year on such essentials at the prison commissary.²⁷

²¹ *Id.*

²² *Id.*

²³ *Id.*

²⁴ *Raher, supra* note 18.

²⁵ *Id.*

²⁶ Jean Trounstein, *Fighting the Fees that Force Prisoners to Pay for Their Incarceration*, 29 Prison Legal News, no. 11, Nov. 2018, at 30.

²⁷ *Id.*

Magnifying the injustice, most of these families have already paid for their loved one's incarceration even before being hit with these additional costs—in the form of taxes. Taxpayers foot most of the bill for jails across the country.²⁸ Since the families of incarcerated people are already paying for the system through their taxes, they are, in effect, funding the system a second time when forced to pay for the nutritional, health, and hygienic needs of those in Bristol County's custody.

These costs come on the heels of large court fines and fees, imposed from start to finish of the criminal legal process. As just a sampling of these costs, indigent Massachusetts residents who are accused of a crime are charged a fee (a minimum of \$150) to apply for a public defender²⁹ and people on probation are charged anywhere between \$850 and \$1,300 per month in probation fees alone.³⁰ These fees—on top of a potpourri of “Restitution,” “Administrative Fees,” and “Victim Assessment Fees,” among others³¹—quickly add up to crushing debts saddled on the

²⁸ Christian Henrichson, Joshua Rinaldi, & Ruth Delaney, *The Price of Jails: Measuring the Taxpayer Cost of Local Incarceration*, Vera Institute of Justice, at 5 (May 2015), <https://www.vera.org/downloads/publications/price-of-jails.pdf>.

²⁹ *The Bail Process: Arrest to Arraignment*, Executive Office of the Trial Court (Sept. 17, 2018), <https://www.mass.gov/info-details/the-bail-process-arrest-to-arraignment>.

³⁰ Wendy Sawyer, *Punishing Poverty: The High Cost of Probation Fees in Massachusetts*, Prison Policy Initiative (Dec. 8, 2016), https://www.prisonpolicy.org/probation/ma_report.html.

³¹ *Potential Money Assessments in Criminal Cases*, Massachusetts Trial Court District Court Department (Oct. 26, 2018), <https://www.mass.gov/doc/2521-chart-of-potential-money-assessments/download>.

most impoverished Massachusetts residents. In total, one survey found, the average debt incurred for incarceration related costs was more than \$13,000.³² Incarcerated people carry these debts back into the community after they are released, hampering their reintegration into the free world.

Incarceration costs—both directly and indirectly—wreak havoc on family members, including children, who have not been convicted of any crimes.³³ When a family member is incarcerated, that person often transforms from a breadwinner and source of support into a loved one in need of financial assistance. Families must scrape together funds to cover bail bond premiums, court costs, other fines and fees, and to fill commissary accounts so their loved one can maintain proper hygiene and meet basic nutritional needs. In a recent survey, two-thirds of families reported difficulties meeting their own basic needs, such as housing and food, because of the financial costs of having an incarcerated loved one.³⁴ One in five families reported having to take out a loan to cover these costs.³⁵ In another survey, roughly half of families reported being unable to pay court fines and fees.³⁶

³² Saneta deVuono-powell et al., *Who Pays? The True Cost of Incarceration on Families*, Ella Baker Center for Human Rights, Forward Together, & Research Action Design, at 9 (Sep. 2015), <http://whopaysreport.org/who-pays-full-report/9/>.

³³ *Id.*

³⁴ *Id.* at 7–9.

³⁵ *Id.* at 14.

³⁶ *Id.*

Even where families cannot help their incarcerated loved ones financially, incarceration can profoundly affect their finances. They may have lost a breadwinner, or have to grapple with debt collectors garnishing wages or targeting shared assets such as cars and homes.³⁷ Others may lose access to essential federal benefits like TANF and SNAP.³⁸ For the nearly three million children in America with an incarcerated parent, that incarceration greatly increases their risk of living in poverty or experiencing homelessness and reduces their chances of completing high school.³⁹

For individuals and families already experiencing poverty, the economic and emotional costs of incarceration are staggering. Yet Defendants are needlessly harming those marginalized families, and helping themselves, by charging them

³⁷ *Id.* at 15; Lauren-Brooke Eisen & Jessica Eaglin, *Poverty, Incarceration, and Criminal Justice Debt*, TalkPoverty (Dec. 3, 2014), <https://talkpoverty.org/2014/12/02/criminal-justice-debt/>.

³⁸ deVunono-powell, *supra* note 32, at 25; Robyn Cox & Sally Wallace, *The Impact of Incarceration on Food Insecurity Among Households with Children*, Univ. of Ky. Ctr. for Poverty Rsch. Discussion Paper Series, Oct 2021, at 10, n.2 https://uknowledge.uky.edu/cgi/viewcontent.cgi?article=1024&context=ukcpr_papers.

³⁹ Susan D. Phillips, et al., *Disentangling the risks: Parent criminal justice involvement and children's exposure to family risks*, *Criminology and Pub. Pol'y* 5 (2006) at 677–702; Christopher Wildeman, *Parental Incarceration, Child Homelessness, and the Invisible Consequences of Mass Imprisonment*, *The Annals of the Am. Acad. of Pol. & Soc. Sci.* 651.1 (Jan. 2014) at 74–96; Joseph Murray & David Farrington, *The Effect of Parental Imprisonment on Children*, *Crime and Just.* (2008) at 133–206.

unconscionably high fees to maintain limited contact with their incarcerated loved ones.

III. Maintaining Contact With Loved Ones While Incarcerated Has Substantial Social Benefits.

The Sheriff's scheme does not just magnify the economic hardships experienced by incarcerated people and their families. By making contact with loved ones expensive, it also robs incarcerated people of crucial lifelines; incarcerated individuals who are able to maintain consistent contact with their families and friends are healthier people, more positive members of prison communities, and more likely to reintegrate into society successfully after release. The Sheriff's agreement with Securus hampers these benefits, to the detriment of incarcerated people, their families, people who work in prisons, and society writ large.

Life in prison puts incarcerated individuals under extreme stress, which in turn causes a myriad of negative health effects.⁴⁰ Depression, anxiety, and substance abuse are endemic to the prison population.⁴¹ And these mental health disorders can cause or exacerbate already existing chronic health conditions, including asthma,

⁴⁰ *Video Visiting in Corrections: Benefits, Limitations, and Implementation Considerations*, U.S. Dep't of Just. Nat'l Inst. Of Corr. (Jan. 8, 2015), <https://dept.camden.rutgers.edu/nrccfi/files/NIC-Video-Visiting-Guide.pdf>.

⁴¹ *Health Issues During Incarceration*, American Academy of Family Physicians (Dec. 12, 2019), <https://www.aafp.org/about/policies/all/incarceration.html#during>.

hypertension, and diabetes.⁴² This comes at a great cost to taxpayers: In 2015 alone Massachusetts spent nearly \$100,000,000 on healthcare for incarcerated people.⁴³

Contact with loved ones mitigates these health ills. It should come as no surprise that incarcerated people who are able to maintain relationships with their friends and family have lower rates of depression, stress, and anxiety.⁴⁴ Regular phone calls and conversations with loved ones allow incarcerated individuals to feel a sense of normalcy and maintain hope for a better life in the future.

These positive mental health impacts also redound to prison staff. Incarcerated people who do not maintain contact with their communities show increased levels of desperation and anger. As a result, they are more likely to resist prison rules and have interpersonal conflicts with others behind bars.⁴⁵ Conversely, incarcerated

⁴² Committee on Causes and Consequences of High Rates of Incarceration; Committee on Law and Justice; Division of Behavioral and Social Sciences and Education; National Research Council; Board on the Health of Select Populations; Institute of Medicine, *Health and Incarceration: A Workshop Summary*, Washington (DC): National Academies Press (US) (Aug 8, 2013), <https://www.ncbi.nlm.nih.gov/books/NBK201966/>.

⁴³ Kil Huh, et al., *Prison Health Care: Costs and Quality - How and Why States Strive for High-Performing Systems*, The Pew Charitable Trusts (Oct. 2017), https://www.pewtrusts.org/~media/assets/2017/10/sfh_prison_health_care_costs_and_quality_final.pdf.

⁴⁴ *Video Visiting*, *supra* note 40.

⁴⁵ Margaret Higgins, Dominika Malisz, Elysia Newton, Natalie Peterson, Artika Tyner, & Shannon West, *Phone Calls Creating Lifelines for Prisoners and Their Families: A Retrospective Case Study on the Campaign for Prison Phone Justice in Minnesota*, Cmty. Just. Project, Univ. St. Thomas, at 89–90 (Nov. 29, 2015); Songül Duran, Sibel Ergün, Özlem Tekir, Türkan Çalışkan & Ayşe Karadaş, *Anger and*

individuals who stay “connected to their children and families are more likely to avoid negative incidents and have their sentences reduced.”⁴⁶ Prison officials note that when incarcerated people have contact with their families they are more likely to cooperate with staff.⁴⁷

The benefits of consistent contact with loved ones extends after incarcerated people have completed their sentence. Formerly incarcerated people who maintained contact with their family members while in prison are less likely to reoffend upon release.⁴⁸ For example, a Minnesota Department of Corrections study found that even a single visit from loved ones reduced recidivism by 13% for new crimes and 25% for technical violations.⁴⁹ Indeed, formerly incarcerated people cite family support as the most important factor in helping them stay out of prison.⁵⁰ Family and

Tolerance Levels of the Inmates in Prison, 32 Archives of Psychiatric Nursing 66, 68 (2018).

⁴⁶ See 42 USC § 60501(b)(6).

⁴⁷ Bernadette Rabuy & Peter Wagner, *Screening Out Family Time: The For-Profit Video Visitation Industry in Prisons and Jails*, Prison Policy Initiative (Jan. 2015), https://static.prisonpolicy.org/visitation/ScreeningOutFamilyTime_January2015.pdf.

⁴⁸ Joshua Cochran, *The Ties that Bind or the Ties that Break: Examining the Relationship between Visitation and Prisoner Misconduct*, 40 J. Crim. Just. 433, 439 (2012); William Bales and Daniel Mears, *Inmate Social Ties and the Transition to Society: Does Visitation Reduce Recidivism?*, 45(3) J. Research Crime And Delinquency 287 (2008).

⁴⁹ Rabuy, *supra* note 47.

⁵⁰ See 42 USC § 60501(b)(7).

community support systems are vital in helping formerly incarcerated people find housing and employment, both of which are crucial to successful reentry.⁵¹

Contact between incarcerated individuals and their loved ones has many benefits: It decreases health costs, promotes a safer environment within prisons, and increases the chances of successful reentry. Yet Defendants have elected to at worst forgo, and at best significantly hamper, these benefits in pursuit of their own financial gain. This Court should not allow such pernicious, harmful policies to continue.

CONCLUSION

Incarcerated people in Massachusetts and their families start out cash poor and lose much-needed resources because of incarceration, yet the Sheriff's Office concocted a scheme with Securus to fill its coffers by charging unconscionably high costs to receive telephone calls from correctional facilities within its jurisdiction. *Amici* respectfully submit that these circumstances might bear on this Court's consideration of the statutory issues in this case, including whether a revenue-generating calling system that extracts money from the families and loved ones of incarcerated people is consistent with Massachusetts law.

⁵¹ Bruce Western, Anthony Braga, Jaclyn Davis, & Catherine Sirois, *Stress and Hardship After Prison*, 120(5) Amer. J. Socio. 1512, 1533 (2015).

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CERTIFICATE OF COMPLIANCE

Pursuant to Rule 16(k) of the Massachusetts Rules of Appellate Procedure, I hereby certify that the foregoing brief complies with the rules of Court that pertain to the filing of briefs, including Mass. R. A. P. 20. I further certify that the foregoing brief complies with the applicable length limitation in Mass. R. A. P. 20 because it was prepared using Microsoft Word 2020 in Times New Roman 14-point font, a proportionally spaced typeface, with 1-inch margins, and contains 3,650 non-excluded words.

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CERTIFICATE OF SERVICE

Pursuant to Massachusetts Rule of Appellate Procedure 13(e), I the undersigned, certify under the penalties of perjury, that a copy of the foregoing Brief of *Amici Curiae* American Civil Liberties Union of Massachusetts, MediaJustice, and Worth Rises has been served electronically on all parties or their representatives in this action as listed below on this 12th day of October, 2021.

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