Introduction to the 2026-2 Edition

We are pleased to provide you with the 2026-2 Edition for *Federal Civil Rights Acts 3d*. *Federal Civil Rights Acts 3d* is a comprehensive treatment of current civil rights law, by Rodney A. Smolla, President of the Vermont Law and Graduate School.

New features and recent developments in this 2026-2 Edition include:

- In *United States v. Hemani*, in an opinion by Justice Gorsuch, the Supreme Court applied the historical analogy methodology to strike down a federal law prohibiting the possession of a firearm by a regular marijuana user. *See* § 1:1.

- In *Louisiana v. Callais*, the Supreme Court dramatically narrowed § 2 of the Voting Rights Act, construing it to reach essentially only intentional discrimination and reworking the *Gingles* factors to require plaintiffs to control for party affiliation. Justice Kagan, joined by Justices Sotomayor and Jackson, dissented. *See* § 2:10.

- In *Landor v. Louisiana Department of Corrections & Public Safety*, in a 6-3 decision written by Justice Gorsuch, the Supreme Court held that a state prisoner could not bring a claim for money damages against individual prison officials under the Religious Land Use and Institutionalized Persons Act of 2000. *See* § 5:38.

- In *Flowers Foods, Inc. v. Brock*, in an opinion by Justice Gorsuch, the Supreme Court gave an expansive reading to the "transportation worker" exception of § 1 of the Federal Arbitration Act, holding that a worker who transports goods on an intrastate leg of an interstate journey can qualify without crossing state lines or interacting with a vehicle that does. *See* § 9:193.

- In *Olivier v. City of Brandon, Mississippi*, in a unanimous opinion by Justice Kagan, the Supreme Court held that *Heck v. Humphrey* does not bar a § 1983 suit seeking only prospective relief against future enforcement of an ordinance, even though the plaintiff had previously been convicted under it. *See* § 14:46.

- In *Chiles v. Salazar*, in an opinion by Justice Gorsuch, the Supreme Court, by an 8-1 vote, struck down Colorado's ban on conversion therapy for minors as applied to talk therapy, holding that the law regulated speech on the basis of viewpoint. *See* § 17:17.