



1300 I Street, NW | Suite 400 E | Washington, D.C. 20005
(202) 216-9309 | WWW.JUDICIALACTIONGROUP.COM

Joshua Dunlap
Judicial Nominee to the U.S. Court of Appeals for the First Circuit
Research Summary

Age: 41

2018 – Present: Partner, Pierce Atwood LLP, ME
2009 – 2017: Associate, Pierce Atwood LLP, ME
2008 – 2009: Law Clerk, The Hon. Paul J. Kelly, Jr., U.S. Court of Appeals for the Tenth Circuit
2007: Summer Associate, Pierce Atwood LLP, ME
2006: Legal Intern, Alliance Defense Fund (now Alliance Defending Freedom)
Education: Notre Dame Law School (J.D.) 2008; Pensacola Christian College (B.A., Pre-Law) 2005.

Judicial Philosophy:

- In a law review article, Dunlap strongly advocated for Maine’s “primacy approach” when interpreting its state constitution.¹
 - The primacy approach is an interpretive method that prioritizes the state constitution over the federal constitution and first considers the state constitution to resolve a legal issue.² Consequently, with this approach, federal court opinions are viewed more as “helpful guides,” and federal constitutional law is only considered when the state law is less protective of state civil liberties.³
 - The two notable reasons Dunlap supports this approach are because he views the interpretive approach as promoting judicial federalism and judicial restraint.⁴

Note: This is a research summary and, therefore, may not include all information located, and is subject to periodic updates and revisions. Content may not always reflect the latest developments.

¹ Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine's Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/lawmaine/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 3.

² Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine's Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/lawmaine/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 6-7.

³ Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine's Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/lawmaine/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 6-7.

⁴ Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine's Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/lawmaine/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 8.

This research summary was produced through a coalition research cooperative between AFA Action’s Center for Judicial Renewal and Judicial Action Group. This summary is not intended to be comprehensive and may not always contain the latest developments.

- Dunlap asserted that the primacy approach promotes federalism by “ensur[ing] that state courts retain the authority to interpret state law” and “ensur[ing] that there are two independent checks on overweening exercises of state power claims.”⁵
- Concerning judicial restraint, Dunlap argued that, similar to how judges should “avoid expressing opinions on constitutional questions when some other resolution of the issues renders a constitutional ruling unnecessary a court should ‘forbear from ruling on federal constitutional issues before consulting [the] state constitution.’”⁶
- Furthermore, *Dunlap declared that, in order to interpret the Maine Constitution, “state courts must ‘look primarily to the language used.’”*⁷

Faith & the Public Square:

- Dunlap has defended a moderate view of the separation of church and state.
 - In a 2006 Supreme Court Review co-written with Richard Garnett, Dunlap and his co-author called the “institutional separation of religion and government”⁸ “entirely wise,”⁹ but they also insisted that *such a separation “does not require judicially enforced public secularism, or a ‘religion as a hobby’-style privatization of religious faith and activism”*¹⁰
- In a law review article in which Dunlap argued for religious liberty, he stated, “Just last year, in one of the Ten Commandments cases, the [Supreme] Court re-affirmed what the justices have been saying for (at least) fifty years: When the government ‘respects the

⁵ Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine's Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 10.

⁶ Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine's Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 11.

⁷ Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine's Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 25 (emphasis added).

⁸ Richard W. Garnett & Joshua Dunlap, *Taking Accommodation Seriously*, 2005–2006 CATO SUP. CT. REV. 257 (2006), https://www.google.com/books/edition/Cato_Supreme_Court_Review/cr4c4wUN8EwC?hl=en&gbpv=1, at p. 277.

⁹ Richard W. Garnett & Joshua Dunlap, *Taking Accommodation Seriously*, 2005–2006 CATO SUP. CT. REV. 257 (2006), https://www.google.com/books/edition/Cato_Supreme_Court_Review/cr4c4wUN8EwC?hl=en&gbpv=1, at p. 277.

¹⁰ Richard W. Garnett & Joshua Dunlap, *Taking Accommodation Seriously*, 2005–2006 CATO SUP. CT. REV. 257 (2006), https://www.google.com/books/edition/Cato_Supreme_Court_Review/cr4c4wUN8EwC?hl=en&gbpv=1, at p. 277 (emphasis added).

religious nature of our people and accommodates the public service to their needs,’ ‘it follows the best of our traditions.’”¹¹

Religious Liberty:

- In the same law review article in which Dunlap advocated for the primacy approach to interpreting Maine’s constitution, Dunlap also explained how the primacy approach allows Maine’s state courts to better secure and protect the “*unalienable right*” to religious liberty, despite Supreme Court rulings that seem to narrow that right.¹²
 - Dunlap notably asserted that, “*The [Maine Supreme] Court’s primacy approach has led the court to avoid improperly narrowing the expanse of the protections afforded by the state free exercise guarantee contained in . . . the Maine Constitution. As a matter of state constitutional interpretation, the [Maine Supreme] Court has correctly declined to follow the vagaries of the Supreme Court’s free exercise jurisprudence, instead recognizing that Maine’s Declaration of Rights provides greater protection for the free exercise of religion than that provided under the United States Constitution.*”¹³
- As a law student, Dunlap wrote a note that defends the ministerial exception against Title VII discrimination prohibitions, while presenting several arguments that “*the Free Exercise Clause mandates a broad ministerial exception to Title VII.*”¹⁴
 - After giving a historical analysis of religious liberty and explaining several foundational cases for the ministerial exception, Dunlap argued that the ministerial exception should allow religious institutions to make employment decisions regarding *both* “religious function” employees and “secular function” employees, without government interference.¹⁵
 - While making this argument, Dunlap noted that if religious institutions are only allowed to religiously discriminate when hiring employees for a “religious

¹¹ Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine’s Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/lawmaine/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 22.

¹² Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine’s Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/lawmaine/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 14, 44 (emphasis added).

¹³ Joshua Dunlap, *A Venerable Bulwark: Reaffirming the Primacy Approach to Interpreting Maine’s Free Exercise Clause*, 73 ME. L. REV. 1 (2021),

<https://digitalcommons.maine.gov/lawmaine/cgi/viewcontent.cgi?article=1739&context=mlr>, at PDF p. 14 (emphasis added).

¹⁴ Joshua Dunlap, *When Big Brother Plays God: The Religion Clauses, Title VII, and the Ministerial Exception*, 82 NOTRE DAME L. REV. 2005 (2007), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=980565, at PDF p. 2-4 (emphasis added)

¹⁵ Joshua Dunlap, *When Big Brother Plays God: The Religion Clauses, Title VII, and the Ministerial Exception*, 82 NOTRE DAME L. REV. 2005 (2007), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=980565, at PDF p. 27-28.

function,” the government will be able to narrowly interpret what a “religious function” is and, ultimately, undermine the Free Exercise Clause.¹⁶

- Dunlap specifically stated, “[G]ranting the judiciary the authority to define who performs “enough” spiritual functions to qualify as a minister gives the government much the same power as it would possess if the ministerial exemption did not exist. By narrowly defining “minister,” courts might—indeed, will inevitably—refuse to protect positions that a church may deem vital to its spiritual integrity.”¹⁷
- Dunlap concluded by reiterating that “*the ministerial exception must encompass all employment decisions made by churches,*” and that in order “[f]or churches to maintain their autonomy, their core functions must not be subject to government definition.”¹⁸
- In an amicus brief, Dunlap argued that Maine’s tuition assistance program for secondary education violated the Free Exercise and Establishment Clause by only assisting students that attended public or “non-sectarian” schools.¹⁹
 - After reviewing previous Supreme Court cases on religious liberty, Dunlap and his colleagues stated, “[T]he U.S. Supreme Court [has] reiterated that the First Amendment does not permit states to punish the free exercise of religion: ‘The Free Exercise Clause protects against laws that impose[] special disabilities on the basis of . . . religious status.’”²⁰
 - In addition to their constitutionally based arguments, Dunlap and his colleagues presented evidence of the many social and educational benefits students receive when tuition-assistance programs neutrally allow parents to choose which school their child attends, including religious schools.²¹
 - In conclusion, *Dunlap and his colleagues asserted that “[a]llowing religiously affiliated schools to participate in generally available public student-aid*

¹⁶ Joshua Dunlap, *When Big Brother Plays God: The Religion Clauses, Title VII, and the Ministerial Exception*, 82 NOTRE DAME L. REV. 2005 (2007), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=980565, at PDF p. 28.

¹⁷ Joshua Dunlap, *When Big Brother Plays God: The Religion Clauses, Title VII, and the Ministerial Exception*, 82 NOTRE DAME L. REV. 2005 (2007), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=980565, at PDF p. 28 (emphasis added).

¹⁸ Joshua Dunlap, *When Big Brother Plays God: The Religion Clauses, Title VII, and the Ministerial Exception*, 82 NOTRE DAME L. REV. 2005 (2007), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=980565, at PDF p. 29 (emphasis added).

¹⁹ Brief of EdChoice and Maine Heritage Policy Center as Amici Curiae in Support of Appellants, *Carson v. Makin*, 979 F.3d 21 (1st Cir. 2020), <https://www.edchoice.org/wp-content/uploads/2022/04/ME.Carson-v-Makin.US-Ct-of-Appeals-First-Circuit.EdChoice-and-Maine-Heritage.Oct-7.2019.pdf>, at PDF p. 10-13.

²⁰ Brief of EdChoice and Maine Heritage Policy Center as Amici Curiae in Support of Appellants, *Carson v. Makin*, 979 F.3d 21 (1st Cir. 2020), <https://www.edchoice.org/wp-content/uploads/2022/04/ME.Carson-v-Makin.US-Ct-of-Appeals-First-Circuit.EdChoice-and-Maine-Heritage.Oct-7.2019.pdf>, at PDF p. 24-25 (emphasis added).

²¹ Brief of EdChoice and Maine Heritage Policy Center as Amici Curiae in Support of Appellants, *Carson v. Makin*, 979 F.3d 21 (1st Cir. 2020), <https://www.edchoice.org/wp-content/uploads/2022/04/ME.Carson-v-Makin.US-Ct-of-Appeals-First-Circuit.EdChoice-and-Maine-Heritage.Oct-7.2019.pdf>, at PDF p. 25-26.

programs promotes religious tolerance and advances the value of education . . .”²²

- In a law review article co-authored by Dunlap, he examined several Supreme Court cases on religious liberty, arguing that religious liberty is constitutionally protected and beneficial for society.²³
 - Dunlap claimed *“it is a prominent and attractive theme in our political and constitutional traditions that governments not only may, but should, respect religious faith and protect religious freedom through legislative accommodations and by, at times, ‘singling out’ religion”* to protect it from government interference.²⁴
 - Besides the constitutional arguments supporting religious liberty, Dunlap reminds readers that the founders sought to protect religious liberty for *“religious reasons,”* and that, ultimately, religious liberty is a “good thing” for society.²⁵
 - Dunlap explained, *“[R]eligious freedom under and through law is best explained by the fact that ‘the law thinks religion is a good thing’ and is correct in so thinking.”*²⁶
 - Finally, Dunlap concluded by stating, *“We might affirm that human beings are made to seek the truth, are obligated to pursue truth . . . and that this obligation cannot meaningfully be discharged unless persons are protected against coercion in religious matters. And, we might say that secular governments have a moral duty . . . to promote the ability of persons to meet this obligation and flourish in the ordered enjoyment of religious freedom, and should therefore take affirmative steps to remove the obstacles to religion that even well meaning regulations can create.”*²⁷

Sanctity of Life: No information has been located on this topic.

²² Brief of EdChoice and Maine Heritage Policy Center as Amici Curiae in Support of Appellants, *Carson v. Makin*, 979 F.3d 21 (1st Cir. 2020), <https://www.edchoice.org/wp-content/uploads/2022/04/ME.Carson-v-Makin.US-Ct-of-Appeals-First-Circuit.EdChoice-and-Maine-Heritage.Oct-7.2019.pdf>, at PDF p. 39 (emphasis added).

²³ Richard W. Garnett & Joshua D. Dunlap, *Taking Accommodation Seriously: Religious Freedom and the O Centro Case*, CATO SUPREME CT. REV. 257 (2006), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=931186, at PDF p. 2-5.

²⁴ Richard W. Garnett & Joshua D. Dunlap, *Taking Accommodation Seriously: Religious Freedom and the O Centro Case*, CATO SUPREME CT. REV. 257 (2006), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=931186, at PDF p. 23 (emphasis added).

²⁵ Richard W. Garnett & Joshua D. Dunlap, *Taking Accommodation Seriously: Religious Freedom and the O Centro Case*, CATO SUPREME CT. REV. 257 (2006), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=931186, at PDF p. 25-26

²⁶ Richard W. Garnett & Joshua D. Dunlap, *Taking Accommodation Seriously: Religious Freedom and the O Centro Case*, CATO SUPREME CT. REV. 257 (2006), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=931186, at PDF p. 25-26 (emphasis added).

²⁷ Richard W. Garnett & Joshua D. Dunlap, *Taking Accommodation Seriously: Religious Freedom and the O Centro Case*, CATO SUPREME CT. REV. 257 (2006), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=931186, at PDF p. 26 (emphasis added).

LGBT Issues: No information has been located on this topic.

Faith & Worldview:

- Dunlap has given several sermons at his church, Cornerstone Baptist Church.²⁸
 - In 2022, Dunlap gave a sermon on leadership, preaching from the book of Nehemiah.²⁹ In the sermon, Dunlap explained how God has called Christians to leadership, and that Biblical leadership is not control-oriented, but rather, humble servitude.³⁰ Additionally, Dunlap asserted that a godly leader must care for and prioritize God's priorities,³¹ "refuse to compromise his character" by acting with integrity,³² and, ultimately, glorify God.³³
- In the summer of 2006, Dunlap was a legal intern at Alliance Defending Freedom.³⁴
- Dunlap is a contributor to the Federalist Society and has written a few commentaries for the Society's blog and website.³⁵
- From 2002 to 2005, Dunlap attended Pensacola Christian College ("PCC"), where he obtained his Bachelor of Arts in Pre-Law studies.³⁶
 - PCC believes that "God created man and woman in His image and instituted marriage between one who is genetically male and one who is genetically female (Gen. 2:18–24). Additionally, PCC believes that "Scripture forbids any form of sexual immorality including adultery, fornication, homosexuality, bestiality, incest, and use of pornography."³⁷ PCC has also opposed abortion, quoting Isaiah 44:24,

²⁸ See CORNERSTONE BAPTIST CHURCH SCARBOROUGH, ME, *Growing in Godliness - Josh Dunlap - May 29, 2022*, YOUTUBE (May 29, 2022), <https://www.youtube.com/live/1EBbyaA71AI?si=EpFQZkfZCICnMlnH>. See also CORNERSTONE BAPTIST CHURCH SCARBOROUGH, ME, *Waiting on The Lord Psalms 27 - Josh Dunlap - June 26, 2022 PM*, YOUTUBE (June 26, 2022), <https://www.youtube.com/live/3OF7UX21RGo?si=Mw1kQhpz6SWgDSiR>.

²⁹ CORNERSTONE BAPTIST CHURCH SCARBOROUGH, ME, *Lessons In Leadership - Joshua Dunlap, Sunday February 27, 2022 AM*, YOUTUBE (Feb. 27, 2022), <https://www.youtube.com/live/EN45N7467z8?si=oqNLYa0BTQ6NPRvO>, at 19:45.

³⁰ CORNERSTONE BAPTIST CHURCH SCARBOROUGH, ME, *Lessons In Leadership - Joshua Dunlap, Sunday February 27, 2022 AM*, YOUTUBE (Feb. 27, 2022), <https://www.youtube.com/live/EN45N7467z8?si=oqNLYa0BTQ6NPRvO>, at 28:00.

³¹ CORNERSTONE BAPTIST CHURCH SCARBOROUGH, ME, *Lessons In Leadership - Joshua Dunlap, Sunday February 27, 2022 AM*, YOUTUBE (Feb. 27, 2022), <https://www.youtube.com/live/EN45N7467z8?si=oqNLYa0BTQ6NPRvO>, at 28:00.

³² CORNERSTONE BAPTIST CHURCH SCARBOROUGH, ME, *Lessons In Leadership - Joshua Dunlap, Sunday February 27, 2022 AM*, YOUTUBE (Feb. 27, 2022), <https://www.youtube.com/live/EN45N7467z8?si=oqNLYa0BTQ6NPRvO>, at 1:08:45.

³³ CORNERSTONE BAPTIST CHURCH SCARBOROUGH, ME, *Lessons In Leadership - Joshua Dunlap, Sunday February 27, 2022 AM*, YOUTUBE (Feb. 27, 2022), <https://www.youtube.com/live/EN45N7467z8?si=oqNLYa0BTQ6NPRvO>, at 1:13:00.

³⁴ Joshua D. Dunlap, ALL. FOR JUST., <https://afj.org/nominee/joshua-d-dunlap/>.

³⁵ Joshua D. Dunlap, FEDERALIST SOC'Y, <https://fedsoc.org/contributors/joshua-dunlap>.

³⁶ Joshua Dunlap, LINKEDIN, <https://www.linkedin.com/in/joshuadunlap/>.

³⁷ *Biblical Foundations*, PENSACOLA CHRISTIAN COLL., <https://www.pcci.edu/about/biblical-foundations.aspx>.

which says, “Thus saith the LORD, thy redeemer, and He that formed thee from the womb, I am the LORD that maketh all things.”³⁸

- Dunlap has criticized attempts to skirt the Electoral College by forcing a state’s electors to vote for the winner of the national popular vote.
 - Dunlap wrote an article criticizing an Op-ed supporting Maine’s LD 816 bill.³⁹ LD 816 would have forced Maine’s presidential electors to vote for the winner of the national popular vote. Dunlap wrote an article in response criticizing “*the fundamental errors of those who seek to effectively abolish the Electoral College* through adoption of the ‘national popular vote.’”⁴⁰

Second Amendment: No information has been located on this topic.

Education Issues: No information has been located on this topic.

Administrative State:

- In an article, Dunlap discussed whether *Chevron* deference was constitutional, particularly under Maine’s constitution.⁴¹
 - Although Dunlap didn’t expressly provide his thoughts concerning the constitutionality of *Chevron* deference, he noted that, even though Maine’s precedent allowed executive agencies to interpret statutes in the past, *Marbury* established that it is generally the court’s role to interpret statutes.⁴²
 - Dunlap explained, “Going back all the way to *Marbury v. Madison*, we know that courts decide the meaning of a statute. . . . [and] therefore routinely decide how to interpret ambiguous statutes.”⁴³
 - Additionally, after *Dunlap claimed that Chevron deference “significantly constrains the judicial role of interpretation,”* he highlighted a quote from a Justice Gorsuch dissent that cautiously stated, “A maximalist [sic] account of *Chevron* risks turning *Marbury* on its head.”⁴⁴

³⁸ *Caring for Our Children*, PENSACOLA CHRISTIAN COLL. UPDATE (2010),

<https://static.pcci.edu/PCC/Update/PDFs/Archived/2010/PCCUpdateSummer2010.pdf>, at PDF p. 5.

³⁹ Nolan Reichl, *Treat Every Voter the Same and Get Rid of the Electoral College*, BANGOR DAILY NEWS (Mar. 18, 2019), https://www.bangordailynews.com/2019/03/18/opinion/treat-every-voter-the-same-and-get-rid-of-the-electoral-college/?_ga=2.113918851.524954341.1754679011-640628708.1754679010.

⁴⁰ Joshua Dunlap, *Legislature Should Reject National Popular Vote*, BANGOR DAILY NEWS (Mar. 31, 2019), <https://www.bangordailynews.com/2019/03/31/opinion/legislature-should-reject-national-popular-vote/>.

⁴¹ Joshua Dunlap, *Is It Appropriate to Defer to Agency Interpretations under the Maine Constitution?*, JD SUPRA (Jan. 10, 2023), <https://www.jdsupra.com/legalnews/is-it-appropriate-to-defer-to-agency-2332746/>.

⁴² Joshua Dunlap, *Is It Appropriate to Defer to Agency Interpretations under the Maine Constitution?*, JD SUPRA (Jan. 10, 2023), <https://www.jdsupra.com/legalnews/is-it-appropriate-to-defer-to-agency-2332746/>.

⁴³ Joshua Dunlap, *Is It Appropriate to Defer to Agency Interpretations under the Maine Constitution?*, JD SUPRA (Jan. 10, 2023), <https://www.jdsupra.com/legalnews/is-it-appropriate-to-defer-to-agency-2332746/>.

⁴⁴ Joshua Dunlap, *Is It Appropriate to Defer to Agency Interpretations under the Maine Constitution?*, JD SUPRA (Jan. 10, 2023), <https://www.jdsupra.com/legalnews/is-it-appropriate-to-defer-to-agency-2332746/> (emphasis added).

- In a blog post from 2023, Dunlap discussed a recent Maine Supreme Court case in which the Court took issue with agencies having the ability to change their own interpretation of state statutes without explanation. In light of this case and others that questioned *Chevron* deference, Dunlap correctly predicted that *Chevron* might face issues in the near future regarding its applicability.⁴⁵

History of Commitment to Causes:

- Dunlap “regularly defends clients in complex litigation, including class actions and multidistrict litigation. Much of his practice has involved representing financial institutions, manufacturers, retailers, and other institutional clients in state and national consumer class actions involving various issues, including bank overdrafts, products liability, and electronic data breaches.”⁴⁶

Government Overreach: No information has been located on this topic.

⁴⁵ Joshua D. Dunlap, *The Limits of Deference to Agency Interpretations Under Maine Law*, NAT’L L. REV. (Nov. 28, 2023), <https://natlawreview.com/article/limits-deference-agency-interpretations-under-maine-law>.

⁴⁶ Joshua D. Dunlap, FEDERALIST SOC’Y, <https://fedsoc.org/contributors/joshua-dunlap>.