

IN THE UNITED STATES COURT OF APPEALS
FOR VETERANS CLAIMS

PAUL H. YOON, ET AL. v. DOUGLAS A. COLLINS

PETITION FOR EXTRAORDINARY RELIEF

[PROPOSED] BRIEF OF AMICI CURIAE
THE COMMONWEALTH OF VIRGINIA, ALL 49 OTHER STATES,
THE DISTRICT OF COLUMBIA, AND THE COMMONWEALTH
OF THE NORTHERN MARIANA ISLANDS
IN SUPPORT OF PETITIONERS

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TABLE OF CONTENTS

	Page(s)
TABLE OF AUTHORITIES.....	ii
INTRODUCTION AND INTERESTS OF <i>AMICI CURIAE</i>	1
ARGUMENT	4
I. The G.I. Bills reflect Congress’s intent to provide expansive education benefits to veterans and their families	4
II. Amici States play a crucial role in ensuring that veterans receive their G.I. Bill entitlements	9
III. The VA’s denial of petitioners’ entitlements defies the Supreme Court’s holding in <i>Rudisill</i>	12
CONCLUSION	15
COUNSEL FOR ADDITIONAL AMICI STATES	II

TABLE OF AUTHORITIES

Page(s)

Cases

<i>Johnson v. Robison</i> , 415 U.S. 361 (1974)	2
<i>Rudisill v. McDonough</i> , 55 F.4th 879 (Fed. Cir. 2022)	4
<i>Rudisill v. McDonough</i> , 601 U.S. 294 (2024)	3, 4, 12, 13, 14, 15
<i>Selective Draft Law Cases</i> , 245 U.S. 366 (1918)	4
<i>Torres v. Texas Dep’t of Pub. Safety</i> , 597 U.S. 580 (2022)	5

Statutes

38 U.S.C. § 3011	7
38 U.S.C. § 3013	7
38 U.S.C. § 3014	7
38 U.S.C. § 3671	11
Post-9/11 Veterans Educational Assistance Act, Pub. L. No. 110-252, 122 Stat. 2357	7, 8
Pub. L. No. 107-107	8
Serviceman’s Readjustment Act of 1944, Pub. L. No. 78-346, 58 Stat. 284	5

Other Authorities

Anna Quindlen, <i>Because It’s Right</i> , Newsweek (Mar. 22, 2008)	6
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Cassandra Dortch, Cong. Research Serv., R44728, <i>The Role of State Approving Agencies in the Administration of GI Bill Benefits I</i> (2016), available at https://tinyurl.com/ycxhcark	10
H. Rep. 110-720	7, 8
Jennie W. Wenger & Jason M. Ward, <i>The Role of Education Benefits in Supporting Veterans as They Transition to Civilian Life</i> , RAND Corporation (2022), https://tinyurl.com/5z5cdv7h	10
Katherine Kiemle Buckley & Bridgid Cleary, <i>The Restoration & Modernization of Educ. Benefits Under the Post-9/11 Veterans Assistance Act of 2008</i> , 2 Veterans L. Rev. 185 (2010).....	6, 7
National Association of State Approving Agencies, <i>About: Quality Education & Training Programs for Veterans</i> , available at https://tinyurl.com/yrd4hcb	11
Pres. George H.W. Bush, Remarks at a Ceremony Honoring the G.I. Bill, June 5, 1990, available at https://tinyurl.com/33c2uce4	6
Press Release, Office of the Press Secretary, <i>President Bush Signs H.R. 2642, the Supplemental Appropriations Act, 2008</i> (June 30, 2008), https://tinyurl.com/3b7edv4y	4, 9
U.S. Const. art. I, § 8, cl. 11, 12	5
U.S. Department of Defense, <i>75 Years of the GI Bill: How Transformative It's Been</i> , Jan. 9, 2019, https://tinyurl.com/yky732hk	5, 6, 7
University of Virginia School of Continuing and Professional Studies, <i>Active Duty Military & Veterans</i> , https://tinyurl.com/54m2as7s	12

Veterans Benefits Administration, <i>Annual Benefits Report Fiscal Year 2023</i> , available at https://tinyurl.com/mudzba86	8, 9, 10
Virginia Dep’t of Veterans Services, <i>Commissioner’s Annual Report</i> , available at https://tinyurl.com/ys9y8r4p (2024)	10
Virginia Dep’t of Veterans Services, <i>Virginia Veterans Resource Guide 2025</i> , at iii, https://tinyurl.com/yp2w3fun	10, 11

INTRODUCTION AND INTERESTS OF *AMICI CURIAE*¹

Amici curiae are the Commonwealth of Virginia, the State of Alabama, the State of Alaska, the State of Arizona, the State of Arkansas, the State of California, the State of Colorado, the State of Connecticut, the State of Delaware, the District of Columbia, the State of Florida, the State of Georgia, the State of Hawai'i, the State of Idaho, the State of Illinois, the State of Indiana, the State of Iowa, the State of Kansas, the Commonwealth of Kentucky, the State of Louisiana, the State of Maine, the State of Maryland, the Commonwealth of Massachusetts, the State of Michigan, the State of Minnesota, the State of Mississippi, the State of Missouri, the State of Montana, the State of Nebraska, the State of Nevada, the State of New Hampshire, the State of New Jersey, the State of New Mexico, the State of New York, the State of North Carolina, the State of North Dakota, the Commonwealth of the Northern Mariana Islands, the State of Ohio, the State of Oklahoma, the State of Oregon, the Commonwealth of Pennsylvania, the State of Rhode Island, the State of South Carolina, the State of South Dakota, the State of Tennessee, the

¹ This brief is filed under U.S. Vet. App. R. 29 and the accompanying motion for leave to file.

State of Texas, the State of Utah, the State of Vermont, the State of Washington, the State of West Virginia, the State of Wisconsin, and the State of Wyoming (collectively, the Amici States). Amici States submit this brief pursuant in support of U.S. Army veteran Lieutenant Colonel Paul Yoon and his daughter Elizabeth Yoon, and U.S. Air Force veteran Colonel Toby Doran and his son Thomas Doran.

Since World War II, the States have partnered with the federal government to provide veterans and their families with significant education benefits through federal G.I. Bills. Today, most of those education benefits are provided under two separate entitlements: the Montgomery G.I. Bill and the Post-9/11 G.I. Bill. Although the federal G.I. Bills cannot recompense “veterans for the battle risks they ran” or their “personal sacrifices,” the G.I. Bills were “designed to assist [veterans] in readjusting to civilian life and in catching up to those whose lives were not disrupted by military service.” *Johnson v. Robison*, 415 U.S. 361, 381 n.15 (1974) (quotation marks omitted). Congress first enacted these bills after World War II and has repeatedly extended them since. Today, veterans whose service entitles them to education benefits under both of the two principal G.I. Bills are entitled to a total of 48

months of benefits. See *Rudisill v. McDonough*, 601 U.S. 294, 306 (2024).

For years, the Department of Veterans Affairs (VA) has denied veterans rightfully earned education entitlements under a cramped reading of the two G.I. Bills. The Supreme Court recently corrected that error in *Rudisill*, holding that “[v]eterans who separately accrue benefits under both [G.I. Bills] are entitled to both benefits.” 601 U.S. at 314. But the VA continues to deny veterans education benefits to which they are entitled—now by taking an unduly cramped reading of *Rudisill* itself.

Amici States have an important interest in protecting the federal benefits that their veterans are entitled to receive, and for that reason many Amici States also participated as *amici curiae* in *Rudisill*. Amici States’ agencies approve education and training programs where veterans and their families may use their G.I. Bill benefits. Veterans within Amici States’ borders rely on those education benefits to support their families and rejoin the civilian life that they have helped protect. The status of federal benefits is important to Amici States as they structure their own programs. Amici States also have an important interest in ensuring that veterans’ *families* receive their benefits. After all, as the President stated when signing the Post-9/11 G.I. Bill, these

bills “help us to meet our responsibilities to those who support our troops every day—America’s great military families.” Press Release, Office of the Press Secretary, *President Bush Signs H.R. 2642, the Supplemental Appropriations Act, 2008* (June 30, 2008), <https://tinyurl.com/3b7edv4y>. The VA’s flawed reading of *Rudisill* undermines these interests.

ARGUMENT

I. The G.I. Bills reflect Congress’s intent to provide expansive education benefits to veterans and their families

The Continental Congress created the first veterans’ benefit program (a pension for disabled veterans) in 1776, “in response to the states’ failure to pay soldiers fighting the Revolutionary War and the resulting mutinies, protests, and rebellions.” *Rudisill v. McDonough*, 55 F.4th 879, 896 (Fed. Cir. 2022) (Reyna, J., dissenting). Indeed, the failure of the Articles of Confederation adequately to provide for the raising and support of armies in defense of the whole nation was one of the principal reasons the Framers met in Philadelphia in 1787. See *Selective Draft Law Cases*, 245 U.S. 366, 381 (1918) (“When the Constitution came to be formed it may not be disputed that one of the recognized necessities for its adoption was the want of power in Congress to raise an army . . .”).

It is therefore unsurprising that Congress, vested with the power to “declare War” and to “raise and support armies,” U.S. Const. art. I, § 8, cl. 11, 12, plays the preeminent role in caring for Americans who return to civilian life after serving their country. See *Torres v. Texas Dep’t of Pub. Safety*, 597 U.S. 580, 590 (2022).

Since World War II, members of the Armed Forces and their families have relied on the United States’ promise to provide veterans with education benefits. In 1944, Congress enacted the Servicemen’s Readjustment Act, known commonly as the “G.I. Bill.” See Servicemen’s Readjustment Act of 1944, Pub. L. No. 78-346, 58 Stat. 284. This bill offered aid to the sixteen million men and women who defeated America’s enemies in World War II, and offered to help them pursue an education, find a job, buy a home, and successfully transition back to civilian life. U.S. Department of Defense, *75 Years of the GI Bill: How Transformative It’s Been*, Jan. 9, 2019, <https://tinyurl.com/yky732hk>.

The G.I. Bill’s education benefits were transformative for veterans, and for the whole country. The Bill gave veterans the right to apply to the education and training programs of their choice. § 400, 58 Stat. at 287. Its benefits covered tuition, books, supplies, counseling, and living

allowances for education expenses. The “tuition benefits under the GI Bill of 1944 more than covered the cost of higher education.” Katherine Kiemle Buckley & Bridgid Cleary, *The Restoration & Modernization of Educ. Benefits Under the Post-9/11 Veterans Assistance Act of 2008*, 2 Veterans L. Rev. 185, 190 (2010). And veterans used these benefits to great effect: within seven years of the G.I. Bill’s passage, over eight million veterans had used the program, and the number of college and university degree-holders in the United States more than doubled between 1940 and 1950. See *75 Years of the GI Bill*, *supra*.

President George H.W. Bush later described the G.I. Bill as having “changed the lives of millions by replacing old roadblocks with paths of opportunity.” Pres. George H.W. Bush, Remarks at a Ceremony Honoring the G.I. Bill, June 5, 1990, available at <https://tinyurl.com/33c2uce4>. And commentators have since observed that “[e]very dollar spent on the GI Bill was multiplied many times over in benefits to the postwar U.S. economy.” Anna Quindlen, *Because It’s Right*, Newsweek (Mar. 22, 2008), <https://tinyurl.com/ye25j8mr>. Its success has led it to be “viewed by most historians as a resounding legislative achievement, which resulted not only in the successful reintegration of millions of World War

II veterans, but also the renewal of the American dream through expanded access to higher education and home ownership.” Buckley & Cleary, *supra*, at 185.

Congress has extended the G.I. Bill’s benefits several times since World War II, including by extending education benefits to veterans’ families. The G.I. Bill in revised forms helped more than ten million veterans after the wars in Korea and Vietnam. See *75 Years of the GI Bill, supra*. In 1984, Congress again extended education benefits when it enacted the Montgomery G.I. Bill. Under that bill, servicemembers who entered the Armed Forces between July 1984 and September 2030, and served in active duty for two or three continuous years (depending on the enlistment contract), are eligible for 36 months of Montgomery benefits to help meet the costs of tuition, books, and fees. 38 U.S.C. §§ 3011(a)(1)(A), 3013(a)(1), 3014(a). And after the terrorist attacks of September 11, 2001, Senator Jim Webb of Virginia led the effort to update the G.I. Bill for the veterans who fought in the “especially arduous” wars that followed. H. Rep. 110-720 at 37.

The updated Post-9/11 Veterans Educational Assistance Act (“Post-9/11 G.I. Bill”), Pub. L. No. 110-252, 122 Stat. 2357 (codified at 38 U.S.C.

§§ 101, 3301, 3311–19, 3321–24), was meant to recognize “the difficult challenges involved in readjusting to civilian life after wartime service in the Armed Forces,” and provide post-9/11 veterans “with enhanced educational assistance benefits” that are “worthy of such service.” H. Rep. 110-720 at 37. Accordingly, the benefits are more extensive than those that the Montgomery G.I. Bill offers. The Post-9/11 G.I. Bill has provided education benefits to hundreds of thousands of veterans and their families; for instance, 564,665 beneficiaries received over \$8 billion in Post-9/11 G.I. Bill payments in fiscal year 2023. See Veterans Benefits Administration, *Annual Benefits Report Fiscal Year 2023* (hereinafter, “VBA Report”), at 11, <https://tinyurl.com/mudzba86>.

Both the Montgomery and Post-9/11 G.I. Bills permit veterans to transfer G.I. Bill benefits to certain dependent family members. Congress first permitted the transfer of Montgomery G.I. Bill benefits in the National Defense Authorization Act for Fiscal Year 2002. Pub. L. No. 107-107 § 654. Post-9/11 G.I. Bill benefits have been transferrable since its enactment in 2008. Pub. L. No. 110-252 § 5003(a). Indeed, the Post-9/11 G.I. Bill was meant to “make it easier for our troops to transfer unused education benefits to their spouses and children.” *President Bush Signs*

H.R. 2642, supra. Consequently, more than 119,000 of the Post-9/11 G.I. Bill beneficiaries in fiscal year 2023 were veterans' spouses or children. VBA Report at 159.

II. Amici States play a crucial role in ensuring that veterans receive their G.I. Bill entitlements

States provide crucial support to the veterans and their families within their respective borders. They look to, and partner with, the federal government to ensure that their veterans can successfully transition back to civilian life. They also supplement federal assistance with their own. States therefore have a compelling interest in ensuring that their resident veterans—and those veterans' families—are able to obtain the full scope of federal benefits to which they are entitled.

Virginia, for example, is home to approximately 700,000 veterans—including Lieutenant Colonel Yoon—and offers numerous innovative programs and services for veterans. These programs include the Virginia Veteran and Family Support Program, which monitors and coordinates behavioral health, rehabilitative, and supportive services through an integrated and responsive system of care; the Military Medics and Corpsmen Program, which helps put highly-skilled military medical professionals on an express track to employment in hospitals and other

healthcare institutions; and the Virginia Values Veterans Program, which connects veterans with employers who understand and appreciate the value of military service. Virginia Dep’t of Veterans Services, *Virginia Veterans Resource Guide 2025*, at iii, <https://tinyurl.com/yp2w3fun>. Last year alone, Virginia allocated tens of millions of dollars to its Department of Veterans Services to administer these programs. See Virginia Dep’t of Veterans Services, *Commissioner’s Annual Report*, available at <https://tinyurl.com/ys9y8r4p>, at 61 (2024).

Still, the federal G.I. Bills account for the “vast majority of spending on veteran education benefits.” Jennie W. Wenger & Jason M. Ward, *The Role of Education Benefits in Supporting Veterans as They Transition to Civilian Life*, RAND Corporation (2022), <https://tinyurl.com/5z5cdv7h>. Indeed, over 46,000 Virginians received veteran education benefits from the federal government in fiscal year 2023, including over 30,000 who received such benefits under the Post-9/11 G.I. Bill. VBA Report at 60.

Further, the administration of federal G.I. Bill benefits is not an exclusively federal endeavor: Amici States partner with the federal government to “play an important role in the administration of [G.I. Bill] benefits.” Cassandra Dortch, Cong. Research Serv., R44728, *The Role of*

State Approving Agencies in the Administration of GI Bill Benefits I (2016), available at <https://tinyurl.com/ycxhcark>. State Approving Agencies (SAAs) promote and safeguard quality education and training programs for veterans to ensure greater education and training opportunities for returning military members. 38 U.S.C. § 3671(a); National Association of State Approving Agencies, *About: Quality Education & Training Programs for Veterans*, available at <https://tinyurl.com/yrdb4hcb>. SAAs decide whether to approve schools and training programs for use with G.I. Bill funds and help schools and training facilities that seek approval. *Ibid.* These state agencies work with federal agencies and other stakeholders to make G.I. Bills the best education assistance programs possible for veterans.

For example, the Virginia SAA approves and monitors more than 900 programs that are certified for G.I. Bill use. *Virginia Veterans Resource Guide 2025, supra*, at 8. In that capacity, the Virginia SAA works with Virginia's public universities to provide G.I. Bill-covered education for veterans. At the University of Virginia's School of Continuing and Professional Studies, for example, approximately ten percent of the students are veterans, and another six percent are in active

duty or are the spouses or children of veterans. See University of Virginia School of Continuing and Professional Studies, *Active Duty Military & Veterans*, <https://tinyurl.com/54m2as7s>.

Given their important role in the administration of G.I. Bill benefits and their provision of supplemental benefits to veterans, Amici States have a strong interest in ensuring that the VA does not deprive veterans of their well-earned education benefits—benefits that undoubtedly play a critical role in some servicemembers’ decisions to volunteer for our Armed Forces. See, *e.g.*, *Rudisill*, 601 U.S. at 299 (G.I. Bills “honor the sacrifices of those who have served in the military, and as such, have a positive effect on recruitment for the Armed Forces” (cleaned up)).

The federal government has borne primary responsibility for the care of veterans since the Constitution’s adoption. Although States play a critical role in administering the benefits and providing supplemental benefits, they lack the resources to fill the breach opened by the VA’s refusal to provide the full federal benefits to which veterans are entitled.

III. The VA’s denial of petitioners’ entitlements defies the Supreme Court’s holding in *Rudisill*

The VA continues to deny veterans education entitlements that they have earned, contrary to the Supreme Court’s recent ruling in

Rudisill. These denials break the promises made to veterans when they agreed to serve.

In *Rudisill*, the VA erroneously limited a U.S. Army veteran to only 36 months of benefits even though his length of service (nearly eight years) entitled him to a total of 48 months of benefits under both G.I. Bills. *Rudisill*, 601 U.S. at 298, 303. The Supreme Court reversed, holding that a veteran whose length of service qualifies him for entitlements under both G.I. Bills is “separately entitled to each of [the] two educational benefits.” *Id.* at 295. Therefore, absent a statutorily imposed limit, “the VA is statutorily obligated to pay . . . 48 months of benefits.” *Ibid.* Whatever other limits may apply, a veteran’s benefits are not contingent on distinct “periods of service,” but rather are conferred by “the length of [their] military service.” *Id.* at 305–06. That holding covers petitioners’ claims here.

Lieutenant Colonel Paul Yoon served in the U.S. Army for nearly 24 years, including as a chaplain with the storied 101st Airborne Division. Pet. App. 118. During that time, he was deployed to Afghanistan, Iraq, and Kosovo. *Ibid.* He received decorations that include the Bronze Star, Meritorious Service Medal, Army Commendation

Medal, and Air Assault Badge. *Ibid.* In retirement, he attempted to transfer his remaining 14 months of G.I. Bill benefits to his daughter, who is a student at Harvard Law School. *Ibid.* But the VA permitted transfer of less than two months of benefits. Pet. App. 17, 28.

Colonel Toby Doran served in the U.S. Air Force for more than 27 years. Pet. App. 380. During his service, he served in the Mediterranean and Southwest Asia and was deployed to Iraq. *Ibid.* He received awards that include the Legion of Merit, the Meritorious Service Medal with six oak leaf clusters, the Air Medal, the Aerial Achievement Medal with one oak leaf cluster, the Air Force Commendation Medal, and the Air Force Achievement Medal with one oak leaf cluster. *Ibid.* In retirement, he attempted to transfer his remaining 14 months of Post-9/11 G.I. Bill benefits to his son, Thomas Doran, who is studying at Oregon State University. Pet. App. 380–81, 445–47. But the VA permitted transfer of just over two months of benefits. Pet. App. 381.

The VA provided the same reasoning for its restriction of benefits to Lieutenant Colonel Yoon and Colonel Doran. The VA denied petitioners' claims because they only have one period of qualifying service. See, *e.g.*, Pet. App. 28, 405. According to the VA, under *Rudisill*,

petitioners are required to have “separate and distinct periods of qualifying active duty service” in order to access their full entitlements. See, *e.g.*, Pet. App. 33; see also Pet. App. 405 (stating *Rudisill* “does not apply to [Colonel Doran’s] situation” because he “only ha[d] one period of service”).

But the *Rudisill* Court *explicitly rejected* that proposition—and hardly could have done so more clearly. *Rudisill*, 601 U.S. at 306. It pointed out that “[n]otably, our analysis does not focus on [Rudisill’s] periods of service. . . . Rather, what matters is that his lengthy service conferred two separate entitlements.” *Ibid.* The VA’s denial of petitioners’ claims here cannot be squared with *Rudisill*’s clear reasoning. *Rudisill* compels the VA to honor the full 48 months of education benefits that petitioners were promised. The VA’s reading of *Rudisill* is unsupportable and its denial of petitioners’ education benefits is unlawful.

CONCLUSION

The Court should grant petitioners’ requested relief.

Respectfully submitted,

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