UNITED STATES COURT OF APPEALS

FOR THE DISTRICT OF COLUMBIA CIRCUIT

JULIAN MARCUS RAVEN,

Plaintiff-Appellant,

v.

JOHN G. ROBERTS, et al.,

Defendants-Appellees.

No. 26-5081

Civil Action No. 25-2332

APPELLANT'S OPPOSITION TO APPELLEES' MOTION FOR SUMMARY AFFIRMANCE

Plaintiff-Appellant Julian Marcus Raven, proceeding pro se, respectfully submits this Opposition to Appellees' Motion for Summary Affirmance.

Appellees ask this Court to summarily affirm the dismissal of this action without full briefing, without oral argument, and without requiring the courts to answer the central legal question that controls the entire case: what is the Smithsonian Institution, legally?

That question is not rhetorical. It is the threshold issue from which the standing analysis flows. If the Smithsonian is merely an ordinary federal agency, one body of law may apply. If it is a charitable trust instrumentality created pursuant to the Smithson bequest, administered by trustees or trustee-like fiduciaries, and governed by statutory donor-purpose obligations, another body of law applies. If it is a hybrid public trust institution with constitutional, statutory, and fiduciary characteristics, then the courts must say so and identify the legal consequences of that status.

Appellees ask this Court to affirm dismissal for lack of standing while avoiding the very legal classification that determines whether Appellant's alleged injury is legally protected. That is not a proper basis for summary affirmance. It is precisely the kind of unresolved antecedent question of law that requires full appellate review.

This is not a third attempt to force display of a painting. This is an appeal asking whether courts may dismiss a trust-governance case for lack of standing while refusing to define the legal status of the very institution whose status determines the existence of the claimed injury.

For that reason alone, summary affirmance should be denied.

I. SUMMARY AFFIRMANCE IS IMPROPER BECAUSE THE MERITS ARE NOT "SO CLEAR" AS TO WARRANT DISPOSITION WITHOUT FULL BRIEFING.

Summary affirmance is an extraordinary procedural device. It is appropriate only where "the merits of this appeal are so clear as to make summary affirmance proper." Walker v. Washington, 627 F.2d 541, 545 (D.C. Cir. 1980). It is not appropriate where the appeal presents substantial legal questions, unresolved institutional-status issues, or legal arguments that require careful analysis beyond the abbreviated motion process.

Appellees' motion itself demonstrates why summary affirmance is improper. Their entire argument depends upon characterizing Appellant's injury as generalized, abstract, and indistinguishable from the public at large. But that characterization assumes the answer to the very question the District Court refused to resolve: whether the Smithsonian's trust-instrumentality status creates legally protected interests in a defined beneficiary or participant class, including artists specifically identified by Congress in the National Portrait Gallery Act.

Standing requires an "injury in fact"—an invasion of a legally protected interest that is concrete, particularized, and actual or imminent. Lujan v. Defenders of

Wildlife, 504 U.S. 555, 560 (1992). Thus, standing does not exist in a vacuum. It depends upon the source and nature of the legal interest asserted. As the Supreme Court has recognized, the standing inquiry often requires courts to examine "the source of the plaintiff's claim to relief" to determine whether the plaintiff is entitled to invoke judicial power. Warth v. Seldin, 422 U.S. 490, 500 (1975).

Appellant does not ask this Court to decide the full merits before standing. Appellant asks this Court to recognize that the legal source of his claimed injury cannot be dismissed as nonexistent until the courts first identify the legal status of the Smithsonian and the legal consequences of that status. A court cannot declare a trust beneficiary's injury generalized while refusing to decide whether the institution is a trust, who its trustees are, what statutory class Congress identified, and whether fiduciary law supplies a legally protected interest.

That is the unresolved legal issue. It is substantial. It is controlling. It is not suitable for summary affirmance.

II. APPELLEES BEGIN WITH LITIGATION HISTORY BECAUSE THEY CANNOT BEGIN WITH A CLEAR LEGAL DEFINITION OF THE SMITHSONIAN.

Appellees open by emphasizing that this is Appellant's third lawsuit involving the Smithsonian Institution or the National Portrait Gallery. That framing is designed to create the impression of repetition rather than unresolved law. But the number of lawsuits does not answer the legal question presented here.

The relevant point is not that Appellant has repeatedly sued. The relevant point is that the courts have repeatedly avoided answering the central institutional question: what is the Smithsonian, and what law governs its conduct?

In Raven I, the litigation concerned the National Portrait Gallery's refusal to display Appellant's portrait and the government-speech doctrine. In Raven II, the litigation concerned social-media blocking. This appeal is materially different. Appellant now challenges alleged fiduciary nonfeasance, trustee dereliction, institutional misrepresentation, executive overreach, and the Smithsonian's resistance to legal classification under the trust and statutory framework that created and governs it.

Appellees cannot convert prior dismissals into an answer to a question never squarely resolved. Prior litigation history is not a substitute for judicial definition. Nor does it relieve the judiciary of its constitutional function. "It is emphatically the province and duty of the judicial department to say what the law is." Marbury v. Madison, 5 U.S. (1 Cranch) 137, 177 (1803). That principle matters here because the Smithsonian's legal identity is not an academic question; it determines whether

Appellant's asserted injury is legally protected, concrete, particularized, traceable, and redressable.

Appellees' reliance on litigation history is therefore a distraction. The issue is not whether Appellant has sued before. The issue is whether the District Court may dismiss a trust-governance action for lack of standing while declining to define the trust-governance structure that determines standing.

It may not.

III. THE DISTRICT COURT AND APPELLEES IMPROPERLY COLLAPSE THE STANDING QUESTION INTO AN UNDECIDED LEGAL-STATUS QUESTION.

The District Court dismissed Appellant's claims on standing grounds, concluding that Appellant alleged no concrete harm particular to himself. Appellees now ask this Court to summarily affirm that conclusion. But the standing analysis was incomplete because it skipped the antecedent legal question.

Article III standing requires injury, causation, and redressability. Lujan, 504 U.S. at 560–61. But the first element—injury in fact—requires an invasion of a legally protected interest. Id. at 560. Therefore, the Court cannot determine whether

Appellant has alleged a legally protected interest until it identifies the law that protects or does not protect that interest.

Appellant's claim is not merely: "I disagree with Smithsonian governance." Appellant's claim is that the Smithsonian is a congressionally structured charitable trust instrumentality; that its Regents and officers exercise fiduciary or trustee-like duties; that its statutory structure identifies specific institutional purposes and participant classes; that Appellant falls within a congressionally recognized class of artists whose portraiture and statuary are within the statutory object of the National Portrait Gallery; and that Appellant has suffered concrete injury through denial of lawful, impartial, trust-based administration and institutional access.

Whether that theory succeeds depends upon the Smithsonian's legal identity. If the Smithsonian is a trust instrumentality, trust law cannot be waved away as irrelevant. If Congress created statutory functions that specifically include artists who created portraiture and statuary, then Appellant is not merely asserting the same interest as every member of the public. If the Board of Regents and Smithsonian leadership hold or administer trust property for a public charitable purpose, then the law of charitable trusts, fiduciary obligation, and special-interest beneficiary standing becomes relevant to injury.

The District Court did not resolve that framework. Appellees ask this Court not to resolve it either. That is the defect.

Standing cannot be denied by first ignoring the legal status that creates the standing interest and then declaring the resulting injury generalized. That is circular reasoning. It is also contrary to Marbury's command that courts must say what the law is when applying legal rules to particular cases.

IV. APPELLEES RELY ON THE SMITHSONIAN'S TRUST STATUS WHEN CONVENIENT, THEN DENY ALL TRUST-LAW CONSEQUENCES WHEN APPELLANT ASSERTS TRUST-BASED INJURY.

Appellees' motion contains a significant concession. They acknowledge, citing Dong v. Smithsonian Institution, 125 F.3d 877 (D.C. Cir. 1997), that the Smithsonian is a "trust instrumentality of the United States." They then immediately argue that this does not mean the Smithsonian serves as trustee to individual Americans or artists like Appellant.

That maneuver is the heart of the problem.

The Smithsonian and the government have repeatedly shifted the institution's identity depending upon the litigation advantage sought. When agency accountability is at issue, the Smithsonian invokes its unusual non-agency status.

When trust accountability is at issue, Appellees deny that trust status has consequences for beneficiaries. When constitutional or executive-control questions arise, the Smithsonian's hybrid structure becomes even more uncertain. This identity shifting allows the institution to evade accountability before the law.

Dong is not as narrow as Appellees suggest. In Dong, this Court held that the Smithsonian was not an "agency" for purposes of the Privacy Act. 125 F.3d at 879–84. In doing so, the Court recognized the Smithsonian's unique structure and trust origins. The opinion observed that the Smithsonian was created pursuant to the Smithson bequest and that the United States, as trustee, holds legal title to original Smithson trust property and later accretions. Id. at 883. That language matters.

Appellees cannot invoke Dong to resist ordinary agency treatment while denying the legal significance of the same trust-instrumentality status when Appellant asserts fiduciary and trust-based injury. If the Smithsonian is not simply an executive agency, and if trust property is held by the United States as trustee, then the courts must determine what fiduciary, statutory, and equitable obligations follow.

Appellees' position appears to be that the Smithsonian is trust-like enough to avoid some public-law consequences, but not trust-like enough to permit any beneficiary, statutory participant, artist, donor-purpose claimant, or public charitable trust plaintiff to demand fiduciary accountability. That is not law. That is institutional immunity by classification ambiguity.

This Court should not summarily affirm that ambiguity. It should require full briefing on the Smithsonian's legal identity and the consequences of that identity for Article III standing.

V. APPELLEES DO NOT SQUARELY ANSWER APPELLANT'S STATUTORY CLASS ARGUMENT UNDER 20 U.S.C. § 75b(b).

Appellees repeatedly characterize Appellant's claim as a generalized grievance shared with the public at large. But Appellees do not squarely answer Appellant's statutory argument under 20 U.S.C. § 75b(b).

The National Portrait Gallery Act provides that the Gallery shall function as a free public museum for the exhibition and study of portraiture and statuary depicting men and women who have made significant contributions to the history, development, and culture of the people of the United States, "and of the artists who created such portraiture and statuary." 20 U.S.C. § 75b(b).

Congress did not merely establish a museum for an undifferentiated public audience. Congress identified portraiture, statuary, the subjects depicted, and the artists who created such works as part of the Gallery's statutory function. Appellant is not relying solely on his status as a citizen. He is an artist who created portraiture submitted to the National Portrait Gallery and whose legal theory arises from the statutory structure governing that institution.

Appellees reduce this argument to the phrase "individual Americans or artists." But that reduction avoids the statutory text. The relevant class is not "everyone." It is not even "all artists" in the abstract. It is artists connected to the statutory function of the National Portrait Gallery: the creation, exhibition, and study of portraiture and statuary depicting figures significant to American history, development, and culture.

Appellant does not contend that § 75b(b), standing alone, automatically guarantees display of his work. Nor does Appellant contend that every artist may sue over every curatorial disagreement. The argument is narrower and more fundamental: § 75b(b) prevents Appellees from dismissing Appellant's interest as indistinguishable from that of the public at large. Congress specifically identified artists who created such portraiture and statuary within the Gallery's statutory function. That statutory designation is part of the legal-status and legally protected interest analysis.

The District Court did not meaningfully analyze this statutory class. Appellees' motion does not cure that omission. Summary affirmance is therefore improper.

VI. APPELLEES MISCHARACTERIZE THE INJURY AS MERELY THE NON-DISPLAY OF A PORTRAIT.

Appellees' traceability and redressability arguments depend upon reducing this case to one concrete event: the National Portrait Gallery's refusal to display Appellant's portrait. That reduction is inaccurate.

Appellant's current action is not merely a demand that the Court compel display of a painting. Appellant alleges breach of fiduciary duty, constructive fraud and misrepresentation, institutional nonfeasance, trustee dereliction, fiduciary inaction, executive overreach, violation of donor intent, and failure to preserve lawful trust administration. The injury is not simply "my painting was not displayed." The injury is denial of lawful trust administration, denial of impartial fiduciary governance, denial of statutory-participant treatment, and deprivation of meaningful access to a trust-instrumentality structure in which Appellant claims a legally protected interest.

Appellees cannot summarize the Complaint as alleging fiduciary breach, trust nonfeasance, executive overreach, and trustee dereliction, and then reduce standing to a single curatorial denial. That framing is designed to force this case back into

Raven I. But this case presents different claims, different defendants, different legal theories, and a different institutional question.

If the Smithsonian is a trust instrumentality, and if its officers and Regents owe fiduciary duties connected to donor intent, statutory purpose, and impartial administration, then injuries arising from alleged breach of those duties are not automatically generalized. Trust law has long recognized that beneficiaries may suffer injury when trustees depart from trust purposes, abuse discretion, fail to administer impartially, or alter the character of a charitable institution.

Appellees' portrait-only framing is therefore incomplete. It avoids the pleaded trust-governance injury. It also avoids the question whether Appellant, as a statutory artist-participant and asserted special-interest charitable-trust beneficiary, has standing to demand lawful administration rather than display of a particular work.

VII. HOOKER / EDES HOME SUPPORTS SPECIAL-INTEREST BENEFICIARY STANDING IN CHARITABLE TRUST CASES.

Appellees attempt to distinguish Hooker v. Edes Home, 579 A.2d 608 (D.C. 1990), by arguing that the beneficiary class there was narrower than Appellant's asserted class here. Appellant does not deny that Hooker involved a specifically defined class. But Appellees misstate the significance of Hooker.

Hooker is important because it recognizes that the traditional bar against suits by members of the general public to enforce charitable trusts is not absolute. The D.C. Court of Appeals recognized that charitable-trust beneficiaries with a special interest may have standing to sue where trustee action threatens the trust's purpose or administration. Id. at 611–18.

The principle matters here. Appellant does not cite Hooker for the proposition that every member of the public may sue over every Smithsonian decision. Appellant cites Hooker for the proposition that, under District of Columbia trust law, courts recognize special-interest standing where a beneficiary class is sufficiently connected to the trust purpose and where the challenged action concerns the trust's fundamental administration.

Appellees' argument assumes that Appellant's interest is public and undifferentiated. But that assumption depends upon ignoring 20 U.S.C. § 75b(b), the National Portrait Gallery's statutory function, Appellant's status as an artist who created relevant portraiture, and the Smithsonian's acknowledged trust-instrumentality status.

The proper question is not whether Hooker's facts are identical. They are not. The proper question is whether Hooker's legal principle requires courts to consider whether Appellant has a special interest in the Smithsonian's lawful administration before dismissing his claim as generalized. It does.

That question requires full briefing. It cannot be disposed of summarily.

VIII. KAPIOLANI PARK IS PERSUASIVE EQUITABLE AUTHORITY WHERE PUBLIC CHARITABLE TRUST ENFORCEMENT WOULD OTHERWISE FAIL.

Appellees dismiss Kapiolani Park Preservation Society v. City & County of Honolulu, 751 P.2d 1022 (Haw. 1988), because it is a Hawaii state-law charitable trust case and not binding on this Court. Appellant does not contend that Kapiolani Park is binding. Appellant cites it for its persuasive equitable principle.

Kapiolani Park recognized standing where public charitable trust property was administered by a governmental trustee, where the attorney general did not protect the trust interest asserted, and where denial of standing would leave the trust without meaningful protection. Id. at 1028–29. The principle is not foreign to American trust law. Courts of equity have long recognized that charitable trusts require enforceability, and that rigid standing rules may be inappropriate where public officials themselves are the alleged source of breach, neglect, or nonfeasance.

That is the point here. Appellant alleges that public officers, Regents, and institutional fiduciaries have failed to honor the Smithsonian's trust structure, donor intent, statutory purpose, and independence. If the government actors charged with stewardship are themselves aligned with, indifferent to, or responsible for the alleged breach, then telling Appellant that only public officials may enforce the trust becomes an empty remedy.

Appellees' position would leave the Smithsonian's trust status legally meaningful only when the institution invokes it, and legally meaningless when a beneficiary or statutory participant seeks enforcement. Equity does not require that result.

IX. ARTICLE III DOES NOT ERASE TRADITIONAL TRUST INJURIES.

Appellees argue that even if charitable trust law sometimes permits beneficiaries to sue, Article III still requires concrete and particularized injury. Appellant agrees. But that statement does not decide the case.

Article III does not erase traditional forms of injury recognized at common law and equity. The Supreme Court has explained that intangible harms may be concrete where they bear a close relationship to harms traditionally recognized as providing a basis for suit in American courts. TransUnion LLC v. Ramirez, 594 U.S. 413, 425 (2021); Spokeo, Inc. v. Robins, 578 U.S. 330, 340–41 (2016).

Breach of trust is one of the oldest equitable injuries known to Anglo-American law. Beneficiaries have traditionally been able to invoke courts of equity to compel faithful administration, prevent trustee abuse, restrain diversion of trust property, and enforce settlor intent. Charitable trusts differ from private trusts because their beneficiaries may be broader, but that does not mean no legally cognizable injury can ever exist. Hooker confirms that special-interest beneficiaries may have standing in appropriate circumstances. Kapiolani Park confirms that public charitable trust enforcement may require beneficiary standing where official enforcement fails.

The question, therefore, is not whether Article III applies. It does. The question is whether Appellant has alleged a legally protected trust/statutory interest sufficiently concrete and particularized to satisfy Article III. That inquiry cannot be completed without first defining the Smithsonian's legal status and the consequences of its statutory trust structure.

Appellees ask the Court to skip that step. The Court should decline.

X. APPELLEES' NAVAJO NATION ARGUMENT IS MISPLACED.

Appellees cite United States v. Navajo Nation, 537 U.S. 488 (2003), for the proposition that a general trust relationship with the United States is insufficient to impose fiduciary duties. But Navajo Nation does not resolve this case.

Navajo Nation involved claims seeking monetary relief against the United States under Indian Tucker Act principles and required a specific statutory or regulatory basis imposing fiduciary duties enforceable in damages. Id. at 506–08. Appellant does not merely assert a vague “general trust relationship” with the federal government. He points to a specific institution created pursuant to the Smithson bequest, specific congressional statutes governing the Smithsonian and National Portrait Gallery, statutory language identifying artists within the Gallery’s function, and a D.C. Circuit decision acknowledging the Smithsonian’s trust-instrumentality status.

Nor is Appellant merely seeking damages based on a generalized trust relationship. Appellant seeks judicial determination of legal status, fiduciary accountability, preservation of trust administration, and remand under the correct legal framework. Navajo Nation does not permit courts to avoid defining a congressionally structured trust instrumentality. It does not hold that a public charitable trust can never create legally protected interests. It does not answer the statutory class argument under 20 U.S.C. § 75b(b). And it does not authorize dismissal by ambiguity.

XI. REDRESSABILITY EXISTS BECAUSE A DECLARATION OF LEGAL STATUS AND REMAND UNDER THE CORRECT FRAMEWORK WOULD REDRESS THE THRESHOLD INJURY.

Appellees argue that Appellant sought sweeping relief below, including declarations, injunctions, fiduciary enforcement measures, removal of officials, reconstitution of the Board of Regents, preservation orders, and governance reform. They then assert that none of this would redress a personal injury.

That argument attacks the breadth of requested relief while ignoring the minimum relief necessary to redress the injury on appeal.

At this stage, Appellant need not prove entitlement to every remedy requested below. Redressability is satisfied where at least some requested relief would likely redress the asserted injury. See Uzuegbunam v. Preczewski, 592 U.S. 279, 292 (2021). Appellant's appeal seeks, at minimum, reversal and remand for adjudication under the correct legal framework. A declaration that the District Court erred by dismissing without resolving the Smithsonian's legal status would redress the threshold injury: denial of judicial application of the correct trust/statutory framework to Appellant's standing theory.

A remand requiring the District Court to determine whether the Smithsonian is a charitable trust instrumentality, federal entity, hybrid institution, or other legal form would materially alter the legal posture of the case. It would require the court to analyze Appellant's alleged injury under the correct source of law rather than dismissing it as generalized by assumption.

That is redress. Article III does not require the Court to order the National Portrait Gallery to display Appellant's painting. It requires that a favorable decision likely redress the injury alleged. Here, the injury includes denial of legal recognition and trust-based adjudication under the institution's actual status. Reversal and remand would redress that injury.

XII. TRACEABILITY EXISTS BECAUSE THE INJURY FLOWS FROM THE DEFENDANTS' ALLEGED FAILURE TO ADMINISTER AND DEFINE THE TRUST IN ACCORDANCE WITH LAW.

Appellees argue that Appellant cannot trace his injury to the named defendants because the portrait rejection was allegedly an independent curatorial decision. This again depends upon mischaracterizing the injury.

Appellant's traceability theory is not limited to a single curatorial rejection. It concerns the alleged failure of Smithsonian leadership, Regents, public officials, and government actors to administer the Smithsonian according to its legal identity, trust obligations, statutory purpose, and fiduciary duties. The injury flows from governance, nonfeasance, misrepresentation, executive interference, and trustee dereliction.

If the Smithsonian is a trust instrumentality, then the Regents, Secretary, Chancellor, and related institutional actors cannot avoid traceability by pointing to an individual curatorial decision. Trust-governance injuries are traceable to those charged with trust administration, oversight, and faithful execution. Appellant alleges that those actors failed to act, failed to define the institution truthfully, failed to protect donor intent, failed to preserve independence, and failed to administer the institution impartially.

Those allegations may be contested. But they are not so clearly deficient as to justify summary affirmance without full briefing.

XIII. THE COURT SHOULD NOT ALLOW THE SMITHSONIAN TO EVADE ACCOUNTABILITY BY SHIFTING LEGAL IDENTITIES.

The deepest problem in this litigation is the Smithsonian's unstable legal identity. Depending upon the context, it is treated as public, private, federal, non-agency, trust, instrumentality, museum, public charity, or hybrid. That ambiguity may benefit the institution, but it burdens citizens, artists, donors, beneficiaries, and courts seeking to determine what duties apply.

The rule of law cannot tolerate an institution that changes legal identities to avoid accountability. If the Smithsonian is public, it must answer to public law. If it is a trust, it must answer to trust law. If it is a hybrid, the courts must identify the hybrid structure and its consequences. What the courts cannot do is allow the institution to remain undefined while using that undefined status to defeat every claim brought against it.

Marbury is not ornamental here. The judiciary's duty to say what the law is becomes most important when government-created or government-administered institutions resist classification. Appellees ask this Court to affirm dismissal before answering the legal-status question. That request should be denied.

XIV. THIS CASE PRESENTS A SUBSTANTIAL LEGAL QUESTION WARRANTING FULL BRIEFING.

The question presented is substantial:

May a federal court dismiss a trust-governance action for lack of standing while refusing to determine whether the Smithsonian Institution's legal status as a congressionally structured trust instrumentality creates a legally protected interest for a statutory artist-participant and asserted special-interest charitable-trust beneficiary?

That question is not answered by Raven I. It is not answered by Raven II. It is not answered by Appellees' repetition of "generalized grievance." It is not answered by minimizing 20 U.S.C. § 75b(b). It is not answered by acknowledging Dong's trust-instrumentality language and then denying all consequences of trust law.

The appeal should proceed to full briefing because the legal issues are not clear, settled, or frivolous. They involve the Smithsonian's institutional status, public charitable trust law, statutory interpretation, fiduciary obligation, Article III standing, redressability, and the judiciary's role in defining legal rights.

Summary affirmance would not merely affirm a dismissal. It would ratify the avoidance of the threshold legal question that controls the case.

CONCLUSION

Appellees' motion should be denied.

This appeal is not a third attempt to force display of a painting. It is an appeal asking whether courts may dismiss a trust-governance case for lack of standing while refusing to define the legal status of the very institution whose status determines the existence of the claimed injury.

Appellees' motion depends upon calling Appellant's injury generalized before determining whether the Smithsonian's trust-instrumentality status, the National

Portrait Gallery Act, 20 U.S.C. § 75b(b), charitable trust law, and special-interest beneficiary principles create a legally protected interest. That reverses the proper analysis.

The Court should deny Appellees’ Motion for Summary Affirmance and order this appeal to proceed to full briefing.

Respectfully submitted,

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July 1, 2026

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the applicable type-volume limitation of the Federal Rules of Appellate Procedure and the Rules of this Court. This document is prepared in a proportionally spaced typeface, 14-point font.

Respectfully submitted,

Julian Marcus Raven

Plaintiff-Appellant, Pro Se

CERTIFICATE OF SERVICE

I certify that on July 1, 2026, I served the foregoing Appellant's Opposition to Appellees' Motion for Summary Affirmance upon all counsel of record through first class mail and email.

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