

First Supplement to Memorandum 2023-26

**Equal Rights Amendment: Potential Constitutional Conflicts
for Sex Equality Protections**

In reviewing Memorandum 2023-26, the staff discovered two potentially confusing errors in the text. This supplement describes and corrects those errors.

On page 13, the memorandum refers to “dissenting opinions in the Supreme Court case, *Fulton v. City of Philadelphia*, questioning the holding in *Smith*.” The reference should have been to concurring opinions in *Fulton v. City of Philadelphia*. There were no dissenting opinions in that case.

Beginning on the last line of page 27, the memorandum contains quoted material that should have been deleted from the narrative (the quotation is reproduced in footnote 119). On the last line of page 27, the comma should have been a period (followed by footnote 119).

The staff regrets the errors.

Respectfully submitted,

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