nied them information respecting an organization that might or might not be a political action committee.[411] Another area where the Court has interpreted this term liberally is injury to the interests of individuals and associations of individuals who use the environment, affording them standing to challenge actions that threatened those environmental conditions.[412]

Even citizens who bring *qui tam* actions under the False Claims Act—actions that entitle the plaintiff ("relator") to a percentage of any civil penalty assessed for violation—have been held to have standing, on the theory that the government has assigned a portion of its damages claim to the plaintiff, and the assignee of a claim has standing to assert the injury in fact suffered by the assignor.[413] Citing this holding and historical precedent, the Court upheld the standing of an assignee who had promised to remit the proceeds of the litigation to the assignor.[414] The Court noted that "federal courts routinely entertain suits which will result in relief for parties that are not themselves directly bringing suit. Trustees bring suits to benefit their trusts; guardians at litem bring suits to benefit their wards; receivers bring suit to benefit their receiverships; assignees in bankruptcy bring suit to benefit bankrupt estates; and so forth."[415]

The Court has, however, indicated that for plaintiffs to have standing based on an injury to others, that there must be an element of

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[411] That the injury was widely shared did not make the claimed injury a "generalized grievance," the Court held, but rather in this case, as in others, the denial of the statutory right was found to be a concrete harm to each member of the class.

[412] Sierra Club v. Morton, 405 U.S. 727, 735 (1972); United States v. SCRAP, 412 U.S. 669, 687–88 (1973); Duke Power Co. v. Carolina Environmental Study Group, 438 U.S. 59, 72–74 (1978). But the Court has refused to credit general allegations of injury untied to specific governmental actions. *E.g.*, Lujan v. Defenders of Wildlife, 504 U.S. 555 (1992); Lujan v. National Wildlife Federation, 497 U.S. 871 (1990). *SCRAP* in particular is disfavored as too broad. Lujan v. Defenders of Wildlife, 504 U.S. at 566. Moreover, unlike the situation in taxpayer suits, there is no requirement of a nexus between the injuries claimed and the constitutional rights asserted. In *Duke Power*, 438 U.S. at 78–81, claimed environmental and health injuries grew out of construction and operation of nuclear power plants but were not directly related to the governmental action challenged, the limitation of liability and indemnification in cases of nuclear accident. *See also* Metropolitan Washington Airports Auth. v. Citizens for the Abatement of Aircraft Noise, 501 U.S. 252, 264–65 (1991); Friends of the Earth v. Laidlaw Envtl. Servs., 528 U.S. 167 (2000).

[413] Vermont Agency of Nat. Res. v. United States ex rel. Stevens, 529 U.S. 765 (2000). The Court confirmed its conclusion by reference to the long tradition of *qui tam* actions, since the Constitution's restriction of judicial power to "cases" and "controversies" has been interpreted to mean "cases and controversies of the sort traditionally amenable to, and resolved by, the judicial process." Id. at 774.

[414] Sprint Communications Co., L.P. v. APCC Services, Inc., 128 S. Ct. 2531 (2008) (payphone operators had assigned claims against long-distance carriers to "aggregators" to sue on their behalf). Chief Justice Roberts, in a dissent joined by Justices Scalia, Thomas, and Alito, stated that the aggregators lacked standing because they "have nothing to gain from their lawsuit." Id. at 2549.

[415] 128 S. Ct. at 2543.