

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

**MASTERPIECE CAKESHOP
INCORPORATED, a Colorado
corporation; and
JACK PHILLIPS,
Plaintiffs,**

**Intervening Plaintiffs
GRACE HARLEY, Special Forces Of
Liberty, SGM JOHN GUNTER JR.,
Special Forces Of Liberty, 1LT
CHRIS SEVIER ESQ., De Facto
Attorney Generals, WHITNEY
KOHL, Special Forces Of Liberty**

V.

**AUBREY ELENIS, Director of the
Colorado Civil Rights Division, in her
official and individual capacities;
ANTHONY ARAGON, as member of
the Colorado Civil Rights
Commission, in his official capacity;
MIGUEL “MICHAEL” RENE
ELIAS, as member of the Colorado
Civil Rights Commission, in his
official capacity;
CAROL FABRIZIO, as member of
the Colorado Civil Rights
Commission, in her official capacity;
CHARLES GARCIA, as member of
the Colorado Civil Rights
Commission, in his official capacity;
RITA LEWIS, as member of the
Colorado Civil Rights Commission, in
her official capacity;
JESSICA POCOCK, as member of**

**Case No:
1:18-cv-02074-WYD-STV**

<p>the Colorado Civil Rights Commission, in her official capacity; CYNTHIA H. COFFMAN, Colorado Attorney General, in her official capacity; and JOHN HICKENLOOPER, Colorado Governor, in his official capacity, Defendants.</p>		
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MOTION FOR LEAVE TO FILE AND PERMIT THE CENTER FOR GARDEN STATE FAMILIES TO APPEAR AMICI CURIAE IN SUPPORT OF THE PLAINTIFFS AND IN SUPPORT OF THE INTERVENING PLAINTIFFS

see marriageconstitutionrestorationact.com; <https://youtu.be/VhFM-Hg7298>

NOW COMES, the Center for Garden State Families, by and through Counsel, respectfully seeking leave to file *Amicus Curiae*. The attached brief supports the Plaintiffs' causes of action but for reasons that are asserted by the Intervening Plaintiffs. This is an amicus brief that is filed by ex-gays who testimonials prove that just as there is no such thing as a "rape gene," there is no such thing as a gay gene either. The *amicus* brief confirms that that "sexual orientation" has nothing to do with immutability but is a religious mythology that is inseparably linked to the religion of Secular Humanism, which makes Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) unconstitutional in their making and in their enforcement. While the Plaintiffs should prevail on the causes of action asserted, there are superior Constitutional causes of action that the Plaintiff should assert so that actual justice is accomplished. The intervening Plaintiffs raise those controlling questions of law. Admittedly, it is a long standing jurisprudence that "a plaintiff is the master of his own complaint." Normally, the *amicus* would wait until a party had filed a motion for summary judgment before filing a brief. However, this brief is timely under the totality of the circumstances because the *amicus*'s brief encourages the Plaintiffs to amend their complaint pursuant to FRCP 15 to assert a cause of action against the

Defendants that Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. §

24-34-303(1)(b)(I)-(III) violates the First Amendment Establishment Clause for failing the

prongs of the *Lemon* Test.¹ The *Amicus* should be granted leave to file because the brief explains

how Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) fails

prong one of *Lemon* in its making.² The *Amicus* should be allowed to file a belief because it

¹What Is The Lemon Test?

<https://soundcloud.com/user-450634204/what-is-the-lemon-test>

To pass muster under the Establishment Clause, a practice must satisfy the *Lemon* test, pursuant to which it must: (1) have a valid secular purpose; (2) not have the effect of advancing, endorsing, or inhibiting religion; and (3) not foster excessive entanglement with religion. *Id.* at 592 (citing *Lemon v. Kurtzman*, 403 U.S. 602 (1971)). It is important to understand that government action “violates the Establishment Clause if it fails to satisfy any of these prongs.” *Edwards*, 482 U.S. 578 at 583; *Agostini v. Felton*, 521 U.S. 203, 218 (1997). In view of the testimony of ex-gays, medical professionals, and ministers, gay marriage policy, sexual orientation discrimination statutes, transgender bathroom ordinances, and conversion therapy bans violate all three prongs of the *Lemon* test by a landslide in their making and in their enforcement. It is not a close call. There are millions of taxpayers who believe that all forms of parody marriage are immoral. They also believe that to enable acts of immorality is itself an act of immorality. It is coercive for the tax dollars of non-observers of Secular Humanism to be used to endorse parody marriages that do not involve one man and one woman because it makes them feel culpable of condoning immorality. When a person is legally married they are entitled to what is called a “constellation of benefits” that flows from the general fund. These taxpayers in this State have standing to enjoin the State from making or enforcing parody marriage policy, sexual orientation discrimination statutes, transgender bathroom ordinances, and conversion therapy bans because the policies themselves are (1) a non-secular shams that (2) have the effect of creating an indefensible legal weapon against non-observers of the religion of Secular Humanism, while (3) serving to excessively entangle the government with the religion of Secular Humanism. Policies that promote parody marriages do not accomplish their intended purposes and are based on a series of unproven faith-based assumptions and naked assertions that are implicitly religious and inseparable from the Secular Humanism.

² How Does Gay Marriage Policy, Colo. Rev. Stat. § 24-34-601(2)(a), and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) Fail Prong One Of The Lemon Test?

<https://soundcloud.com/user-450634204/how-does-gay-marriage-policy-fail-prong-one-of-the-lemon-test>

The State’s enforcement of gay marriage policy and the State’s enforcement or perspective enforcement of sexual orientation discrimination statutes, transgender bathroom ordinances, or conversion therapy bans violate prong one of *Lemon* because those policies are not “secular” and because they are the ultimate “sham” for purposes of the Establishment Clause, since they have an underlying primary religious objective. At the core of the “Establishment Clause is the

provides evidence that Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. §

24-34-303(1)(b)(I)-(III) fails prong II of *Lemon* for creating an indefensible legal weapon against all non-observers of the religion of Secular Humanism, not just the Plaintiffs.³ It is obvious to

requirement that a government justify in secular terms its purpose for engaging in activities which may appear to endorse the beliefs of a particular religion.” *ACLU v. Rabun Cnty. Chamber of Commerce, Inc.*, 698 F.2d 1098, 1111 (11th Cir. 1983). This secular purpose must be the “pre-eminent” and “primary” force driving the government’s action, and “has to be genuine, not a sham, and not merely secondary to a religious objective.” *McCreary Cnty, Ky. v. ACLU of Ky.*, 545 U.S. 844 (2005). There are at least seven reasons why legally recognized gay marriage violates prong one of *Lemon* provided in motions for summary judgment and *amicus* briefs posted under the tab called "Law for Attorney Generals." First, in the wake of *Obergefell* there has not been a land rush on gay marriage. The raw numbers tell the tale. Prior to the *Obergefell* decision two years ago, the 7.9 percent of gays who were married would have amounted to 154,000 married gay couples. Two years later, this had grown to 10.2 percent or 198,000 married couples. Second, gay marriage policies are a total sham because while there has not been a land rush on gay marriage, there has been a land rush on Christian persecution. Third, while there has not been a land rush on gay marriage, there has been a land rush by Secular Humanists to infiltrate elementary schools with the purpose of indoctrinating minors to the Secular Humanism ideology on sex, faith, morality, marriage, and truth. Fourth, the fact that majority in *Obergefell* pretended that gay rights were civil rights like race-based civil rights are, when race-based civil rights are actually based on immutability, shows that gay marriage policy and all other pro-gay policies are sham. Fifth, the fact that in the wake of *Obergefell* self-identified homosexuals continue to protest ex-gay conventions because the testimony of ex-gays causes the legal basis behind the fake gay civil rights plight to implode shows that the government’s endorsement of LGBTQ ideology is a sham. Sixth, the fact that parody marriages have never been a part of American history and tradition and that gay marriage was basically illegal until *Lawrence v. Texas*, 539 U.S. 558 (2003) recently overturned *Bowers v. Hardwick*, 478 U. S. 186 (1986), and yet the Court pretended otherwise by monkeying with the Fourteenth amendment’s Substantive Due Process Clause shows that gay marriage policy is a sham. The purpose of the government’s decision to entangle itself with the LGBTQ church was to promote tolerance and equality for a pretend people group, and because the “stated purpose [of the government's entanglement with the LGBTQ church has] not [been] actually furthered...then that purpose [must be] disregarded as being insincere or a sham.” *Church of Scientology v. City of Clearwater*,. 2 F.3d 1514, 1527 (11th Cir. 1993).

³ [How Does Gay Marriage Policy, Colo. Rev. Stat. § 24-34-601\(2\)\(a\), and Colo. Rev. Stat. § 24-34-303\(1\)\(b\)\(I\)-\(III\) Fail Prong Two Of The Lemon Test](https://soundcloud.com/user-450634204/how-does-gay-marriage-policy-fail-prong-two-of-the-lemon-test)

<https://soundcloud.com/user-450634204/how-does-gay-marriage-policy-fail-prong-two-of-the-lemon-test>

Under this second prong of the *Lemon* test, courts ask, “irrespective of the . . . stated purpose, whether [the state action] . . . has the primary effect of conveying a message that the [government] is advancing or inhibiting religion.” *Indiana Civil Liberties Union v. O’Bannon*, 259 F.3d 766,

everyone that Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) offend prong two of Lemon to everyone but Alliance Defending Freedom because they have the same financial incentive that the ACLU has for not acknowledging that fact. The *amicus* does not care about money. The *amicus* cares about the same thing that this Honorable Court does - justice and strengthening the rule of law. The *amicus* should be granted leave because the brief provides arguments for how the enforcement of gay marriage policy, Colo. Rev. Stat. § 24-34-601(2)(a), and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) violate prong III of *Lemon* for excessively entangling the government of Secular Humanism.⁴ The Court can take judicial

771 (7th Cir. 2001). The “effect prong asks whether, irrespective of government’s actual purpose,” *Wallace v. Jaffree*, 472 U.S. 38, 56 n.42 (1985), the “symbolic union of church and state...is sufficiently likely to be perceived by adherents of the controlling denominations as an endorsement, and by the nonadherents as a disapproval, of their individual religious choices.” *School Dist. v. Ball*, 473 U.S. 373, 390 (1985); *see also Larkin v. Grendel's Den*, 459 U.S. 116, 126-27 (1982)(even the “mere appearance” of religious endorsement is prohibited). In the wake of the *Obergefell* and *Windsor* p utsch, there has not been a land rush on gay marriage, but there has been a land rush by Secular Humanists to persecute Christians for refusing to endorse a religious worldview that non-observers of Secular Humanism believe is self-evidently immoral, obscene, and subversive to human flourishing. While "gay marriage" is "fake marriage," the government’s endorsement of homosexual orthodoxy has lead to the “very real” persecution of Christians. The unconstitutional codification of the fake gay civil rights movement amount to an indefensible “legal weapon that no [Christian or non-observer of Secular Humanism] can obtain.” *City of Boerne v. Flores*, 521 U.S. 507 (1997). A “gay marriage license” issued by the state amounts to a government issued “license to oppress.” That is the effect of the government's unconstitutional entanglement with the religion of Secular Humanism. It is an evil that the Establishment Clause does not allow. The CADA statute that Jack Phillips was sued under violated the Establishment Clause in its making (it took state action to create it) and in its enforcement for failing prong two of Lemon. Alliance Defending Freedom refused to make that argument because they are more interested in defending donations and persecution is good for their business model.

⁴ [How Does Gay Marriage Policy, Colo. Rev. Stat. § 24-34-601\(2\)\(a\), and Colo. Rev. Stat. § 24-34-303\(1\)\(b\)\(I\)-\(III\), Fail Prong Three Of Lemon?](https://soundcloud.com/user-450634204/how-does-gay-marriage-policy-fail-prong-three-of-lemon)

<https://soundcloud.com/user-450634204/how-does-gay-marriage-policy-fail-prong-three-of-lemon>

The State’s enforcement of gay marriage policy or its potential enforcement of transgender bathroom policies, conversion therapy bans, or sexual orientation discrimination statutes excessive entangles the government with the religion of Secular Humanism because it enshrines

notice of legislative facts. Courts “can take take judicial notice of legislative facts.” *Landell v. Sorrell*, 382 S3d. 91 (2nd Cir. 2004); *Lebron v. Secretary of Florida*, 772 F3d 1352 (11th Cir 2014); *Brand v. Motley*, 526 F3d 921 (6th Cir. 2008). Leave to file should be granted because the *amicus* is working with the Special Forces of Liberty and De Facto Attorney Generals to

one narrow and exclusive version postmodern western individualistic moral relativism, i.e. Secular Humanism, as the irrefutable supreme national religion. *In re Young*, 141 F.3d 854 (8th Cir 1998); *Westchester Day School v. Village of Mamaroneck*, 504 F.3d 338, 349 (2d Cir. 2007). In the wake of the *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015) and *United States v. Windsor*, 133 S. Ct. 2675, 186 L. Ed. 2d 808 (2013) judicial putsch, there has not been a land rush on gay marriage, but there has been a land rush by Secular Humanists to infiltrate elementary schools with the purpose of indoctrinating minors to a worldview on marriage, morality, and sex that is questionably real, moral, decent, and non-secular. The Supreme Court has emphasized that there are “heightened concerns with protecting freedom of conscience from subtle coercive pressure in the elementary and secondary public schools,” *Lee v. Weisman*, 505 U.S. 577, 592 (1992). The Federal courts have thus “been particularly vigilant in monitoring compliance with the Establishment Clause” in the public-school context, see *Edwards v. Aguillard*, 482 U.S. 578, 583 (1987). The legislature has a duty under Article VI to be vigilant as well to keep Secular Humanists from indoctrinating minors to Secular Humanist’s religious worldview. The government’s endorsement of gay marriage policy has had the effect of entitling Secular Humanists to impose their religious beliefs on minors in public schools in a manner that demonstrates that gay marriage policy and sexual orientation statutes are religious shams that violate the Establishment Clause. Because tax dollars are flowing from the general fund to finance the distribution of a constellation of benefits to self-identified homosexuals who legally marry and because there are hundreds of thousands of taxpayers in every state who do not want to play a role in enabling parody marriages, the enforcement of gay marriage policy fails prong three of the Lemon Test for excessively entangling the government with the religion of Secular Humanism and therefore violates the First Amendment Establishment Clause.

What Is Religion Really?

<https://soundcloud.com/user-450634204/what-is-religion-really>

All “religion” amounts to is a a set of answers to the greater questions, like “why are we here” and “what should humans be doing.” “Religion” is, therefore, a set of unproven truth claims and naked assertions that can only be taken on faith. The Establishment Clause was never designed to single out “institutionalized religions,” like Christianity and Judaism, which tends to parallel transcultural self-evident truth that serves as the master narrative of the Constitution itself. The Establishment Clause also was designed - if not more so - to prohibit the government from legally codifying the truth claims floated by “non-institutionalized religions” as well, to include the truth claims asserted by the religion of postmodern western moral relativism and expressive individualism. Currently, “secularism” is having a full blown crisis because “secularism” is a “religion” in most respects that only pretends to be neutral.

compel the Colorado House and Senate introduce an act to be entitled the Marriage And Constitution Restoration Act in a manner that will better enable the red states and the federal Congress to pass the same the bill in a way that will cause Colo. Rev. Stat. § 24-34-601(2)(a), Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III), and gay marriage policy to be done away with for good.⁵ In the scheme of things, these proceedings are just a formality. The governments entanglement with the LGBTQ church is a ticking time bomb.

The fact of the matter is that continued attempts to arbitrarily limit marriage to two people in an effort to sneak around the Establishment Clause will no long fly. Attempts to arbitrarily limit marriage to two people has always been a non-secular sham that is without merit and is just an excuse for Democrats to entangle the government with the ideology floated by the largest denomination within the church of Secular Humanism.⁶ With Justice Kennedy stepping

<https://soundcloud.com/user-450634204/the-marriage-and-constitution-restoration-act-summary-overview>

Does the Marriage And Constitution Restoration Act single out gay marriage?

<https://soundcloud.com/user-450634204/does-the-marriage-and-constitution-restoration-act-single-out-gay-marriage>

There are some bills that single out the LGBTQ community or gay marriage. But this is not one of them. This act does not single out self-identified homosexuals or gay marriage. This act bars the State from endorsing, recognizing, respecting, or favoring any form of marriage that does not involve one man and one woman. This act acknowledges that all citizens can have wedding ceremonies of all kinds and live as married people do. It is simply the case that the government is prohibited from being in the parody marriage business.

⁶ Why Can't The States Limit Marriage To Two Consenting People?

<https://soundcloud.com/user-450634204/why-cant-the-state-limit-marriage-to-two-consenting-people>

The Establishment Clause of the First Amendment of the United States Constitution prohibits all of the States from limiting marriage to two consenting adults. It is an arbitrary law state consideration that is undone by the holding in Obergefell and the Fourteenth Amendment if Obergefell was not a sham. Since the Supreme Court pretended that marriage is an “existing right,” “individual right,” and “fundamental right” based on a “personal choice” for self-identified homosexuals under the Fourteenth Amendment, then it follows that marriage must be an “existing right,” “individual right,” and “fundamental right” based on a personal choice for self-identified polygamists, zoophiles, and objectophiles as well under the Fourteenth

down in the wake of *Masterpiece Cakeshop v. the Colorado Civil Rights Commission*, 584 U. S.

____ (2018), it is game over when it comes to the continuation of what the Honorable Justice

Scalia correctly called an “egotistic....putsch” that constitutes a “threat to American

Democracy.”⁷ The Plaintiffs should amend the complaint and include an Establishment Clause

Amendment. *Zablocki v. Redhail*, 434 U.S. 374, 384 (1978) (fundamental right); *Cleveland Bd. of Educ. v. LaFleur*, 414 U.S. 632, 63940 (1974) (personal choice); *Loving v. Virginia*, 388 U.S. 1, 12 (1967) (existing right/individual right); *Lawrence v. Texas*, 539 U.S. 558 (2003) (intimate choice). Otherwise, gay marriage plight is just a sham that is really barred by the Establishment Clause. The bottom line is that the Secular Humanists on the court are guilty of monkeying with the Fourteenth Amendment in a manner that makes Secular Humanists judges an internalized threat to American Democracy. The attempt by the blue states to limit marriage to two people is merely another arbitrary marriage ban that violates the Fourteenth Amendment, if the *Obergefell* decision was valid. But it was not. The First Amendment has exclusive jurisdiction in informing the states how to respond to all marriage requests that do not involve one man and one woman and how to respond to self-asserted sex-based identity narratives that are questionably real, moral, and decent.

⁷ [What Was The Real Implication Of The Masterpiece Cakeshop Decision?](https://soundcloud.com/user-450634204/what-was-the-real-implication-of-the-masterpiece-cakeshop-decision)

<https://soundcloud.com/user-450634204/what-was-the-real-implication-of-the-masterpiece-cakeshop-decision>

The 7 to 2 decision in *Masterpiece Cakeshop v. the Colorado Civil Rights Commission*, 584 U. S. ____ (2018) shows that the decisions in *Obergefell* and *Windsor* were a political ploy and an unprincipled misapplication of the Fourteenth and Fifth Amendments. There is no such thing as "partial civil rights movements." If the “gay civil rights movement” was an actual a “civil rights movement,” then Jack Phillips should have been required to defy his religious beliefs and bake the cake for the self-identified homosexual couple. Secular Humanists on the Supreme Court have been behaving like children who have been caught in a lie because they have been exposed for having monkeyed with the Fourteenth Amendment by misapplying it to create law that entangles the government with Secular Humanism. Imagine if after the race-based civil rights movement of the 1960s, blacks could still be barred from military service or they still could be required to ride on the back of the bus. Discrimination on the basis for color is an evil that cuts across aspects of society because unlike sexual orientation it really is based on immutability and genetics. The gay civil rights movement is about Secular Humanists entangling the government with their private code to ratify a moral superiority complex that is dangerous, desensitizing, depersonalizing, dehumanizing, and destructive and most importantly non-secular. The fake gay civil rights movement is an effort by devout moral relativists to use government to explain away the natural feelings of shame and inadequacy that come from engaging in forms of sex that violate the givenness of our nature and the truth about the way things are and the way we are. Instead of trying to make all sides happy, the Federal Court judges should have just done their job by enforcing the Constitution as it was written and not as how devout Secular Humanists wished that it was.

claim because the Supreme Court has already recognized that Secular Humanism is a religion.⁸

⁸ What Is The Religion Of Secular Humanism?

<https://soundcloud.com/user-450634204/what-is-the-religion-of-secular-humanism>

Ex-gays, medical professionals, and licensed ministers have provided testimony under oath in support of this bill that sexual orientation has nothing to do with immutability or the Fourteenth Amendment, but rather, sexual orientation is a religious orthodoxy that is inseparably linked to the religion of Secular Humanism. The United States Supreme Court (and most of the Federal Courts of appeals) have held that Secular Humanism is religion for purposes of the Establishment Clause. See the Supreme Court decisions in *Torcaso v. Watkins*, 367 U.S. 488 (1961) and *Edwards v. Aguillard*, 482 U.S. 578, 583 (1987). (“Among religions in this country, which do not teach what would generally be considered a belief in the existence of God, are Buddhism, Taoism, Ethical Culture, Secular Humanism, and others.” See Also *Washington Ethical Society v. District of Columbia*, 101 U.S. App. D.C. 371, 249 F. 2d 127 (1957); 2 *Encyclopaedia of the Social Sciences*, 293; J.Archer, *Faiths MenLive By* 120—138, 254—313 (2d ed. revised by Purinton 1958); Stokes & P feffer, *supra*, n.3 ,at 560. *Welsh v. U.S.*, 1970398 U.S. 333 (U.S. Cal. June 15);; *Wells v. City and Cnty. of Denver*, 257 F.3d 1132 (2001)). There is hardly anything “secular” about the religion of “Secular Humanism.” The first amendment was never just designed to single out institutionalized religions to keep the government from respecting its doctrine. The Establishment Clause was designed, if not more so, to prevent moral relativists from using government to enshrine their Secular Humanist dogma. In *Real Alternatives*, the Seventh Circuit Court of Appeals stated: “w e detect a difference in the “philosophical views” espoused by [the litigants], and the “secular moral system[s]...equivalent to religion except for non-belief in God” that Judge Easterbrook describes in *Center for Inquiry*, 758 F.3d at 873. There, the Seventh Circuit references organized groups of people who subscribe to belief systems such as Atheism, Shintoism, Janism, Buddhism, and secular humanism, all of which “are situated similarly to religions in everything except belief in a deity.” *Id.* at 872. “These systems are organized, full, and provide a comprehensive code by which individuals may guide their daily activities.” Instead having across or the ten commandments, the LGBTQ church has the gay pride flag and their own commandments, such as if you disagree with LGBTQ ideology you are a bigot worth marginalizing. The unproven naked truth claims evangelized by the LGBTQ church such as (1) there is a gay gene, that (2) people can be born in the wrong body, that (3) same-sex sexual activity checks out with the human design, that (4) same-sex buggery is not immoral, and that (5) people come out of the closet are baptized gay consists of a series of unproven faith based assumptions that are implicitly religious and take a huge amount of faith to believe are even plausible. Here is a video on Secular Humanism is a religion.

<https://www.youtube.com/watch?v=TeSM7cbXSEI>;

What Is The Problem With The ACLU And The Freedom From Religion Foundation?

<https://soundcloud.com/user-450634204/what-is-the-problem-with-the-aclu-and-the-freedom-from-religion-foundation>

The ACLU and Freedom From Religion Foundation are constantly pushing to entangle the government with the religion of Secular Humanism that they ardently subscribe to. Both of these organizations are too intellectually blind and dishonest to see or admit that they have been working for decades to entangle the government with their religion - establishing Secular

The legislatures are recognizing it as well through legislative instruments authored by the Special Forces Of Liberty created directly out of a series of federal actions.

Leave should be granted because this brief seeks to protect ex-gays and non-observers of the religion of Secular Humanism from persecution. (see the declaration of Robin Goodspeed).

Leave should be granted because the amicus is defending the integrity of the race-based civil rights movement lead by Pastor Martin Luther King Jr, which the political and Constitutional malpractice of the Defendants threatens.⁹ Leave should be granted because when the Defendants suggest “love is love,” it does not mean what the public thinks.¹⁰ This brief ties in with the briefs

Humanism as the national supreme religion. The problem for the ACLU and the Freedom From Religion Foundation is that the Supreme Court and just about every Circuit Court has held that Atheism is a religion. *Wells v. City and Cnty. of Denver*, 257 F.3d 1132 (2001). The reason why in *Van Orden v. Perry*, 545 U.S. 677 (2005), Justice Breyer in his concurrence stated that "the Establishment Clause does not compel the government to purge from the public sphere all that in any way partakes of the religious" because "[s]uch absolutism is not only inconsistent with our national traditions, but would also tend to promote the kind of social conflict the Establishment Clause seeks to avoid" was because western postmodern moral relativism is a religion whose faith-based dogmatic unproven truth claims cannot be respected through government recognition.

⁹ Anyone who compares the "gay civil rights plight" to the "race-based civil rights plight," whereas the race-based civil rights plight was actually based on immutability, only to not really mean it, has engaged in acts of fraud and racial animus in-kind that manages to be emotionally, intellectually, sexually, and racially exploitative. To oppose the government's unconstitutional endorsement of homosexual ideology is to defend the civil rights movement lead by Pastor Martin Luther King Jr. To embrace the fake gay rights movement is deeply offensive to people of color who were required at one point to walk to school, drink from the colored water fountain, and undergo mistreatment for characteristics that are without question based on genetics and immutability, not emotional faith-based beliefs. If a government official supports the government's endorsement of gay rights, they are refusing to think logically and can be accused of bigotry in-kind. Legislators support this act support the rule of law and the supremacy of the United States Constitution. Those who oppose this act that balances the Free Exercise Clause with the Establishment Clause are on the wrong side of history and reality. While there are thousands of ex-gays, there is no such thing as an “ex-black person.” Help us safeguard and restore the integrity of the civil rights movement lead by Dr. Martin Luther King Jr. by standing behind the Marriage And Constitution Restoration Act.

¹⁰ [What Does Love Is Love Really Mean?](https://soundcloud.com/user-450634204/what-does-love-is-love-really-mean)

<https://soundcloud.com/user-450634204/what-does-love-is-love-really-mean>

filed by the National Alliance of Black Pastors, the Coalition of Doctors Defending Reparative Therapy, and American Family Association of PA, all of which make different points of law and point to different undisputed facts that will help the Court find the law, as Article III rights. It is important that this brief be in the record because it is the position of *Amicus* that for any government official to falsely equate the gay plight to the race based civil rights movement lead by Pastor Martin Luther King is an act of intellectual dishonesty that amounts to racism in kind in a manner that manages to be sexually, intellectually, emotionally, and racially exploitative. It is true that black lives matter and that all lives matter, and it matters that the race-based civil rights movement not be exploited by people who are really just advocates for perversion and the erosion of community standards of decency. While there is no such thing as an ex-black person, there are thousands of ex-gays and this brief prove that in a way that the Colorado Civil Rights Commission cannot deny no matter how much intellectual squinting it attempts.¹¹ *Amicus* has a

When people say that "love is love" what they really mean is that they are perfectly ok with government assets being used to crush anyone who believes that homosexuality is immoral or subversive to human flourishing. Such a position is categorically "unloving." It is more accurate to say that "love without truth is shallow sentimentality." One thing that the fake gay civil rights movement has managed to prove is that people who are "intolerant" of "intolerant people" are "intolerant;" people who are "judgmental" against "judgmental people" are "judgmental;" people who are "dogmatic" about not being "dogmatic" are themselves "dogmatic." As Justice Kennedy stated in *Masterpiece Cakeshop*, "tolerance has to cut both ways."

¹¹ Do gay people exist or do only self-identified gay people exist?

<https://soundcloud.com/user-450634204/do-gay-people-exist>

There is no such thing as "homosexuals." There are only some people who "self-identify" as "homosexual" for at least some period of time. While people have the right under the Free Exercise clause to form self-asserted sex-based identity narratives, the Establishment Clause prohibits the government from respecting and recognizing identify narratives that are questionably real, moral, and decent. Sex-based identity narratives are semi-religious in nature. While there are no such thing as "ex-blacks," there are thousands of ex-gays. The First Amendment in balancing the Free Exercise Clause and the Establishment Clause has exclusive jurisdiction in resolving the question as to which marriages the States can recognize and how the States must respond to self-asserted sex-based identify narratives that are questionably real, moral, and have a tendency to erode community standards of decency. It is intellectually,

vested interest in defending the integrity of the race-based civil rights movement and in defending ex-gays who have converted to a new identity narrative from being socially marginalized and violently oppressed by intolerant brainwashed Secular Humanists, who do not even believe in objective right and wrong.¹²

Comparing the dilemmas of same-sex couples to the centuries of discrimination faced by Black Americans is a deceptive distortion of our country's culture and history. The disgraces in our nation's history pertaining to the civil rights of Black Americans are unmatched. No other class of individuals, including individuals who are same-sex, objectophilic, or polygamously

racially, sexually, and emotionally dishonest for Secular Humanists advocate the unprincipled ploy that the Fourteenth Amendment has anything to do with answering how the States must legally define marriage.

¹² Pastor Charlene Cothran is the director of the National Alliance of Black Pastors And Persecuted Christians. Her sworn statement is in the record and sets forth her interest in detail. # Pastor Cothran is an African American Pastor who operated as a Militant self-identified Lesbian activist for over 28 years before converting to Christianity and leaving the lifestyle behind completely. Pastor Cothran was radically transformed by the personalized truth found in the New Testament Gospel. She went from persecuting Christians, as a devout self-identified lesbian to becoming one, leaving homosexuality behind. This brief draws from research conducted by the National Coalition of Black Pastors and Christian Leaders, which represent the interests of over 25,000 Churches and Ministries that include over 3 million laity. The National Coalition of Black Pastors and Christian Leaders lead their pastoral communities, preach, spread the good news of God's love, and promote the truth. As pastors, *Amici* are considered shepherds who guide their church communities in accordance with time-proven Biblical values and truth. For *Amici*, the Bible expresses sound, ethically-grounded doctrine upon which individuals beneficially rely regarding family matters. *Amici* carry the responsibility to oppose unsound morally-relative doctrines embraced by government actors and to oppose practices that are harmful to the following of God's time-proven teachings that accord with the self-evident transcultural universal law that is woven into the fabric of the Universe. *Amici* hold an interest in the government not entangling itself with the religion of Secular Humanism postmodern moral relativism and expressive individualism. *Amici* are taxpayers themselves who have standing to file their own separate lawsuit under the Establishment Clause enjoining the State from legally endorsing, respecting, and recognizing gay marriage. The *Amici* were in-part inspired to author this brief after seeing the LGBTQ community gang up on and persecute African American Vanderbilt law professor Carol Swain, who is an outspoken grace-based Christian who is full of good will and the truth.

attracted, have ever been enslaved, or lawfully viewed not as human, but as property.¹³

Self-identified homosexuals, polygamists, transgenders, zoophiles and objectofile have never lawfully been forced to attend different schools, walk on separate public sidewalks, sit at the back of the bus, drink out of separate drinking fountains, denied their right to assemble, or denied their voting rights. *Id.* The legal history of these disparate classifications, i.e., immutable racial discrimination and same-sex attraction, is incongruent. Yet, some devout Moral Relativists in office have mistakenly understated this incongruence to manufacture and mandate the ill-conceived and apparently limitless concept of “marriage equality.”

This brief, in-part, focuses on how *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015) was a sham because the Supreme Court lacked subject matter jurisdiction to impose gay marriage just as the Defendants cannot impose Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III). This brief makes the case that the Fourteenth and Fifth Amendment Due Process and Equal Protection Clauses have nothing to do with how the states are permitted to define marriage and react to self-asserted sex-based identity narratives that are questionably real, moral, decent, and have the tendency to erode community standards of decency.. It follows that if gay marriage policy is unconstitutional and unenforceable under the Establishment Clause, then so are Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) on the same Constitutional prescription. A State has no responsibility to promote any person’s sexual proclivities, whether heterosexual, homosexual, or otherwise—and certainly is not required to accept that one’s sexual conduct preference is the same as an immutable

¹³ See, e.g., Stacy Swimp, *LGBT Comparison of Marriage Redefinition to Historical Black Civil Rights Struggles is Dishonest and Manufactured* (March 7, 2014), (<http://stacyswimp.net/2014/03/07/lgbt-comparison-of-marriage-redefinition-to-historical-Black-civil-rights-struggles-is-dishonest-and-manufactured>).

characteristic like race. The Supreme Court in *Obergefell* should have upheld the State's marriage bans because the underlying legal basis for the marriage bans was the First Amendment Establishment Clause. Plus the states have a compelling interest to uphold community standards of decency as the marriage bans and as Jack Phillips has done at immense expense to himself.¹⁴ If the Attorney General actually understood her job, she would know that all forms of parody marriage erode community standards of decency and affront the obscenity codes which she is charged to enforce. So does the enforcement of Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) because of "sexula orientation" discrimination. The fact that the Defendants do not know that homosexual and transgenderism are obscene, immoral, and non-secular demonstrates that they lack the character fitness to be in office and are a danger to the public's safety, health, and welfare. By rejecting the transgenders and self-identified homosexuals' requests imposed on Masterpiece Cake shop, the *amicus* believes that the Plaintiffs are fulfilling a narrowly tailored compelling state interest. Anyone with a semblance of

¹⁴ [What Was The Real Purpose Behind The Original Gay Marriage Bans?](https://soundcloud.com/user-450634204/what-was-the-real-purpose-behind-the-original-gay-marriage-bans)

<https://soundcloud.com/user-450634204/what-was-the-real-purpose-behind-the-original-gay-marriage-bans>

The original legal basis behind State's bans on parody marriages rested on the notion that parody marriages erode community standards of decency. The State's Constitution and the Supreme Court of the United States has made it clear that the States have a compelling interest to uphold community standards of decency. *Paris Adult Theatre I v. Slaton*, 413 US 49 (1973). Courts have held that "any school boy knows that a homosexual act is immoral, indecent, lewd, and obscene. Adult persons are even more conscious that this is true." *Schlegel v. United States*, 416 F. 2d 1372, 1378 (Ct. Cl. 1969). The Supreme Court has long since held that "to simply adjust the definition of obscenity to social realities has always failed to be persuasive before the Courts of the United States." *Ginsberg v. New York*, 390 U.S. 629, 639-40, 88 S.Ct. 1274, 20 L.Ed.2d 195 (1968), *Mishkin v. State of New York*, 383 U.S. 502, 509, 86 S. Ct. 958, 16 L. Ed. 2d 56 (1966), and *Bookcase, Inc. v. Broderick*, 18 N.Y.2d 71, 271 N.Y.S.2d 947, 951, 218 N.E.2d 668, 671 (1966). Community standards do not evolve but groups of people can become desensitized to objective immorality. While that is a state law argument, what is without question is that all parody marriage policies and sexual orientation discrimination states fail all three prongs of the Lemon test and violate the Establishment Clause in their making and in their enforcement.

common sense can see that. But the hallmark of the Colorado Civil Rights Commission is that it is intellectually blind because it has allowed itself to unwisely become brainwashed through a subscription to the unexamined assumption of the superiority of our cultural moment. By allowing the *amicus* to file it might illuminate the truth and help the blind see so that human flourishing can be advanced in a meaningful way in the formation of a more perfect union. Here is the truth - there is no such thing as “gay people.” There are only some people who self-identify as gay for some period of time. Thousands of those people realize that they have been duped, having only conformed to society’s messages only to discover a great truth allows them to be set free from the lies floated by the LGBTQ community that the Defendants promote for self-serving reasons.

“Although there is no formal rule governing the filing of *amicus curiae* briefs, district courts possess the inherent authority to grant or refuse leave to *amicus* parties.” *Georgia Aquarium, Inc. v. Pritzker*, 135 F.Supp.3d 1280 (N.D.Ga.2015). “A district court exercises wide discretion in deciding whether to grant or deny leave to file an *amicus* brief.” *United States v. Board of County Commissioners of the County of Otero*, 184 F.Supp.3d 1097 (D.N.M. 2015). See also: Brief of an *Amicus Curiae* FRAP Rule 29;; Pleadings Allowed; Form of Motions and Other Papers FRCP Rule 7.

Amicus should be granted leave because this case has the potential to strike down all sexual orientation statutes like Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) that exist in other states as the United States First Amendment Establishment Clause requires based on arguments that the *amicus* and the Special Forces Of Liberty have been making before a litany of legislative bodies. While self-identified

homosexuals force homosexual orthodoxy on the whole of America, it will be the testimony of ex-gays who were transformed by the same God that Jack Phillips worships that will completely end the governments entanglement with LGBTQ ideology - which does tend to cultivate mental illness. Furthermore, leave should be granted because the *amicus* is providing the Constitutional basis for *Obergefell* to be overruled. *Obergefell* and the enforcement of Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) against the Plaintiffs were based on emotion - nothing more. Due to their profuse refusal to think logically, the Defendants seem incapable of understanding that emotional appeals do not allow government actors to usurp the Establishment Clause.¹⁵ Perhaps this brief, which seeks to safeguard the integrity of the

¹⁵ [Do Emotional Appeals Or Sincerity Of Belief Allow The Government To Usurp The Establishment Clause?](https://soundcloud.com/user-450634204/do-emotional-appeals-or-sincerity-of-belief-allow-the-government-to-usurp-the-establishment-clause)

<https://soundcloud.com/user-450634204/do-emotional-appeals-or-sincerity-of-belief-allow-the-government-to-usurp-the-establishment-clause>

Emotional appeals do not allow the government to usurp the Establishment Clause. When President Obama came into office, he emphasized that he wanted to appoint Judges to the Court who would demonstrate empathy. The entire basis for the Supreme Court in *Obergefell* to force the government to respect gay marriage policy was predicated on a series of emotional appeals and naked assertions that were implicitly religious in nature. Justices, like Ginsburg and Sotomayor, were moved by the the stories of self-identified homosexuals who were dropped off in the middle of nowhere by taxi cab drivers, denied medical treatment, and assaulted, simply because they identified as homosexual. While those stories are tragic, they do not justify the Supreme Court's decision to misuse the Fourteenth Amendment in a manner in which it was never designed. There are other forms of relief already in place for victims who were wronged by taxi drivers, hospitals, and assailants. In *Holloman v. Harland*, 370 F.3 1252 (11th Cir. 2004), an elementary school teacher required her students to have a moment of silent to start the day. She had really good emotional and pragmatic reasons for doing so. Yet, the Eleventh Circuit found that the moment of silence had a primary religious purpose. The effect of the *Holloman* decision was that emotional appeals do not allow government actors to usurp the Establishment Clause. The *Windsor* and *Obergefell* Courts allowed emotional and pragmatic appeals to override the Establishment Clause by pretending that self-identified gay people were a class of people for purposes of the Fourteenth Amendment. Yet, the truth is that self-identified gay people are a part of a denominational sect within the over all religion of Secular Humanism. While there are no such thing as ex-blacks, ex-whites, ex-asians, and ex-hispanics, there are thousands of ex-gays, whose testimony voids the Federal Courts of Subject Matter and Personal Jurisdiction under claims brought by self-identified homosexuals under the Fourteenth and Fifth

race-based civil rights plight lead by Pastor Martin Luther King might help the Defendants awaken to transcultural reality about the way things are and the way we are.

Leave should be granted because “Stare Decisis” does not keep *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015) from being overruled for the reasons that the *amicus* and the Special Forces Of Liberty have been asserting at legislative hearings on the Marriage And Constitution Restoration Act and in the Courts’ records all across the United States. While the Judiciary has been attempting to circle the wagons to defend an unprincipled ploy for reasons that are immature, the legislative branch is not having it. The *Obergefell* and *Windsor* decisions were calculated shams that has caused real suffering - see the declaration of Lisa Bouch from WW Bridal and Pastor Penkoski.¹⁶ The Supreme Court found that “questions which merely lurk in the

Amendments. The government cannot respect or recognize the LGBTQ dogma through creating or enforcing policies because the ideology is based on a series of unproven faith-based assumptions and naked assertions that are implicitly religious in nature.

¹⁶ [Why Can't The States Limit Marriage To Two Consenting People?](https://soundcloud.com/user-450634204/why-cant-the-state-limit-marriage-to-two-consenting-people)

<https://soundcloud.com/user-450634204/why-cant-the-state-limit-marriage-to-two-consenting-people>

The Establishment Clause of the First Amendment of the United States Constitution prohibits all of the States from limiting marriage to two consenting adults. It is an arbitrary law state consideration that is undone by the holding in *Obergefell* and the Fourteenth Amendment if *Obergefell* was not a sham. Since the Supreme Court pretended that marriage is an “existing right,” “individual right,” and “fundamental right” based on a “personal choice” for self-identified homosexuals under the Fourteenth Amendment, then it follows that marriage must be an “existing right,” “individual right,” and “fundamental right” based on a personal choice for self-identified polygamists, zoophiles, and objectophiles as well under the Fourteenth Amendment. *Zablocki v. Redhail*, 434 U.S. 374, 384 (1978) (fundamental right); *Cleveland Bd. of Educ. v. LaFleur*, 414 U.S. 632, 63940 (1974) (personal choice); *Loving v. Virginia*, 388 U.S. 1, 12 (1967) (existing right/individual right); *Lawrence v. Texas*, 539 U.S. 558 (2003) (intimate choice). Otherwise, gay marriage plight is just a sham that is really barred by the Establishment Clause. The bottom line is that the Secular Humanists on the court are guilty of monkeying with the Fourteenth Amendment in a manner that makes Secular Humanists judges an internalized threat to American Democracy. The attempt by the blue states to limit marriage to two people is merely another arbitrary marriage ban that violates the Fourteenth Amendment, if the *Obergefell* decision was valid. But it was not. The First Amendment has exclusive jurisdiction in informing the states how to respond to all marriage requests that do not involve one man and one woman

record, neither brought to attention of the court nor ruled upon, are not to be considered as having been so decided as to constitute precedents.” *Cooper Industries, Inc. v. Aviall Services, Inc.* 543 U.S. 157 (2004). The Establishment Clause claims were “lurking” in the record but undecided in *Obergefell*. “[Stare Decisis] is at its weakest when [the courts] interpret the Constitution because our interpretation can be altered only by constitutional amendment or by overruling our prior decisions.” *Seminole Tribe of Fla. v. Florida*, 517 U.S. 44, 63, 116 S.Ct. 1114, 1127, 134 L.Ed.2d 252 (1996); *St. Joseph Stock Yards Co. v. United States*, 298 U.S. 38, 94, 56 S.Ct. 720, 744, 80 L.Ed. 1033 (1936) (Stone and Cardozo, JJ., concurring in result) (“The doctrine of stare decisis ... has only a limited application in the field of constitutional law”). The *amicus* is asking the Honorable District Court in this case to re-interpret the Constitution correctly and to provide relief that Plaintiffs is asking for and then some.¹⁷ Judges and politicians in the other branches are human. They make mistakes. *Amicus*’s brief may help the Court relegate *Obergefell* to the line of overruled Supreme Court cases that were decided incorrectly.¹⁸ None of us are perfect, but we can change course and do what is right. That is the

and how to respond to self-asserted sex-based identity narratives that are questionably real, moral, and decent.

¹⁷ By allowing the *Amicus* filer to submit its brief it can allow to this Honorable Court and the Defendants to do its job under the Article 6 of the United States Constitution which reads: This Constitution, and the laws of the United States which shall be made in pursuance thereof; and all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land; and the judges in every state shall be bound thereby, anything in the Constitution or laws of any State to the contrary notwithstanding. The Senators and Representatives before mentioned, and the members of the several state legislatures, and all executive and judicial officers, both of the United States and of the several states, shall be bound by oath or affirmation, to support this Constitution.

¹⁸ *Swift v. Tyson*, 41 U.S. 1 (1842), overruled by *Erie Railroad Co. v. Tompkins*, 304 U.S. 64, 58 S.Ct. 817 (1938). *Plessy v. Ferguson*, 163 U.S. 537, 16 S.Ct. 1138 (1896) held that “equal but separate” segregated facilities were constitutionally permissible. Overruled by *Brown v. Board of Education of Topeka, Shawnee County, Kan.*, 347 U.S. 483, 495, 74 S.Ct. 686, 692 (1954) (“Separate educational facilities are inherently unequal.”). *Lochner v. New York*, 198 U.S. 45,

25 S.Ct. 539 (1905) held that a state statute could not invalidate employer-employee contracts that required more than 60 hours/week of work. Overruled in part by *Day-Brite Lighting Inc. v. State of Mo.*, 342 U.S. 421, 72 S.Ct. 405 (1952); and *Ferguson v. Skrupa*, 372 U.S. 726, 83 S.Ct. 1028 (1963). *Coppage v. State of Kansas*, 236 U.S. 1, 35 S.Ct. 240 (1915) held invalid a state statute that forbade employers to condition employment on a promise not to join a labor union. Overruled in part by *Phelps Dodge Corp. v. N.L.R.B.*, 313 U.S. 177, 61 S.Ct. 845 (1941). *Adkins v. Children's Hospital of the District of Columbia*, 261 U.S. 525, 43 S.Ct. 394 (1923) invalidated minimum wage statutes. Overruled in part by *West Coast Hotel Co. v. Parrish*, 300 U.S. 379, 57 S.Ct. 578 (1937). *Burnet v. Coronado Oil & Gas Co.*, 285 U.S. 393, 52 S.Ct. 443 (1932), overruled in part by *Helvering v. Bankline Oil Co.*, 303 U.S. 362, 58 S.Ct. 616 (1938) and *Helvering v. Mountain Producers Corporation*, 303 U.S. 376, 58 S.Ct. 623 (1938). *Minersville School District v. Gobitis*, 310 U.S. 586, 60 S.Ct. 1010 (1940) held that a public school could expel pupils who refused to salute the flag because they were Jehovah's Witnesses. Overruled by *West Virginia State Board of Education v. Barnette*, 319 U.S. 624, 63 S.Ct. 1178 (1943). cases overruled after 1 Jan 1960: *Minturn v. Maynard*, 58 U.S. 477 (1854) held that an agent was barred from suing a principal under admiralty law. Overruled by *Exxon Corp. v. Central Gulf Lines, Inc.*, 500 U.S. 603, 111 S.Ct. 2071 (1991). *Low v. Austin*, 80 U.S. 29 (1871), overruled by *Michelin Tire Corp. v. Wages*, 423 U.S. 276, 96 S.Ct. 535 (1976). *Pennoyer v. Neff*, 95 U.S. 714 (1878), overruled in part by *Shaffer v. Heitner*, 433 U.S. 186, 97 S.Ct. 2569 (1977). *Kring v. State of Missouri*, 107 U.S. 221 (1883), overruled by *Collins v. Youngblood*, 497 U.S. 37, 110 S.Ct. 2715 (1990). *The Harrisburg*, 119 U.S. 199, 7 S.Ct. 140 (1886) held that federal maritime law did not recognize a cause of action for wrongful death. Overruled by *Moragne v. States Marine Lines, Inc.*, 398 U.S. 375, 90 S.Ct. 1772 (1970). See also *Yamaha Motor Corp., U.S.A. v. Calhoun*, 516 U.S. 199 (1996). *Pollock v. Farmers' Loan & Trust Co.*, 157 U.S. 429, 15 S.Ct. 673 (1895), overruled by *South Carolina v. Baker*, 485 U.S. 505, 108 S.Ct. 1355 (1988). *Geer v. State of Connecticut*, 161 U.S. 519, 16 S.Ct. 600 (1896), overruled by *Hughes v. Oklahoma*, 441 U.S. 322, 99 S.Ct. 1727 (1979). *Thompson v. State of Utah*, 170 U.S. 343, 18 S.Ct. 620 (1898), overruled by *Collins v. Youngblood*, 497 U.S. 37, 110 S.Ct. 2715 (1990). *Pope v. Williams*, 193 U.S. 621, 24 S.Ct. 573 (1904), overruled by *Dunn v. Blumstein*, 405 U.S. 330, 337, n. 7, 92 S.Ct. 995, 1000 (1972) ("To the extent that dicta in that opinion are inconsistent with the test we apply or the result we reach today, those dicta are rejected."). *Evans v. Gore*, 253 U.S. 245, 40 S.Ct. 550 (1920). Overruled by *U.S. v. Hatter*, 532 U.S. 557, 121 S.Ct. 1782 (2001). *Quaker City Cab Co. v. Commonwealth of Pennsylvania*, 277 U.S. 389, 48 S.Ct. 553 (1928), abrogated by *Lehnhausen v. Lake Shore Auto Parts Co.*, 410 U.S. 356, 365, 93 S.Ct. 1001, 1006 (1973) ("*Quaker City Cab Co. v. Pennsylvania* is only a relic of a bygone era. We cannot follow it and stay within the narrow confines of judicial review, which is an important part of our constitutional tradition."). *Olmstead v. U.S.*, 277 U.S. 438, 48 S.Ct. 564 (1928) held that telephone wiretaps are not forbidden by the Fourth Amendment. Overruled by *Berger v. State of N.Y.*, 388 U.S. 41, 64, 87 S.Ct. 1873, 1886 (1967) (Douglas, J., concurring) ("I join the opinion of the Court because at long last it overrules sub silentio *Olmstead v. United States*, 277 U.S. 438, 48 S.Ct. 564, 72 L.Ed. 944, and its offspring and brings wiretapping and other electronic eavesdropping fully within the purview of the Fourth Amendment.") and by *Katz v. U.S.*, 389 U.S. 347, 362, n. *, 88 S.Ct. 507, 517 (1967) (Harlan, J., concurring) ("... today's decision must be recognized as overruling *Olmstead v. United States*, 277 U.S. 438, 48 S.Ct. 564, 72 L.Ed.

944, which essentially rested on the ground that conversations were not subject to the protection of the Fourth Amendment.”). *Louis K. Liggett Co. v. Baldridge*, 278 U.S. 105, 49 S.Ct. 57 (1928), overruled by *North Dakota State Bd. of Pharmacy v. Snyder's Drug Stores, Inc.*, 414 U.S. 156, 94 S.Ct. 407 (1973). *Sinclair v. U.S.*, 279 U.S. 263, 49 S.Ct. 268 (1929), overruled by *U.S. v. Gaudin*, 515 U.S. 506, 115 S.Ct. 2310 (1995). *Enelow v. New York Life Ins. Co.*, 293 U.S. 379, 55 S.Ct. 310 (1935), overruled by *Gulfstream Aerospace Corp. v. Mayacamas Corp.*, 485 U.S. 271, 108 S.Ct. 1133 (1988). *Aero Mayflower Transit Co. v. Georgia Public Service Commission*, 295 U.S. 285, 55 S.Ct. 709, (1935), overruled by *American Trucking Associations, Inc. v. Scheiner*, 483 U.S. 266, 107 S.Ct. 2829 (1987). See also *American Trucking Associations, Inc. v. Smith*, 496 U.S. 167, 110 S.Ct. 2323 (1990). *Triplett v. Lowell*, 297 U.S. 638, 56 S.Ct. 645 (1936), overruled in part by *Blonder-Tongue Laboratories, Inc. v. University of Illinois Foundation*, 402 U.S. 313, 91 S.Ct. 1434 (1971). *Puget Sound Stevedoring Co. v. Tax Com'n of State of Washington*, 302 U.S. 90, 58 S.Ct. 72 (1937), overruled by *Department of Revenue of State of Washington v. Association of Washington Stevedoring Companies*, 435 U.S. 734, 98 S.Ct. 1388 (1978). *Moore v. Illinois Central Railroad Co.*, 312 U.S. 630, 61 S.Ct. 754 (1941), overruled in part by *Andrews v. Louisville & Nashville Railroad Co.*, 406 U.S. 320, 92 S.Ct. 1562 (1972). *Valentine v. Chrestensen*, 316 U.S. 52, 62 S.Ct. 920 (1942) held commercial speech had no First Amendment protection. Overruled by *Virginia State Board of Pharmacy v. Virginia Citizens Consumer Council, Inc.*, 425 U.S. 748, 96 S.Ct. 1817 (1976). *Ettelson v. Metropolitan Life Ins. Co.*, 317 U.S. 188, 63 S.Ct. 163 (1942), overruled by *Gulfstream Aerospace Corp. v. Mayacamas Corp.*, 485 U.S. 271, 108 S.Ct. 1133 (1988). *Ford Motor Co. v. Department of Treasury of State of Indiana*, 323 U.S. 459, 65 S.Ct. 347 (1945), overruled by *Lapides v. Board of Regents of University System of Georgia*, 535 U.S. 613, 122 S.Ct. 1640 (2002). *House v. Mayo*, 324 U.S. 42, 65 S.Ct. 517 (1945) held that the U.S. Supreme Court lacks jurisdiction to review denials of certificates of probable cause. Overruled by *Hohn v. U.S.*, 524 U.S. 236, 118 S.Ct. 1969 (1998). *Commissioner of Internal Revenue v. Wilcox*, 327 U.S. 404, 66 S.Ct. 546 (1946) held that embezzled money was not taxable as income. Overruled in part by *James v. U.S.*, 366 U.S. 213, 81 S.Ct. 1052 (1961). *Joseph v. Carter & Weekes Stevedoring Co.*, 330 U.S. 422, 67 S.Ct. 815 (1947), overruled by *Department of Revenue of State of Washington v. Association of Washington Stevedoring Companies*, 435 U.S. 734, 98 S.Ct. 1388 (1978). *Goesaert v. Cleary*, 335 U.S. 464, 69 S.Ct. 198 (1948), disapproved of by *Craig v. Boren*, 429 U.S. 190, 210, n. 23 (1976) (“Insofar as *Goesaert v. Cleary*, 335 U.S. 464, 69 S.Ct. 198, 93 L.Ed. 163 (1948), may be inconsistent, that decision is disapproved.”). *International Union, U. A. W., A. F. of L., Local 232 v. Wisconsin Employment Relations Board*, 336 U.S. 245, 69 S.Ct. 516 (1949), overruled by *Lodge 76, Intern. Ass'n of Machinists and Aerospace Workers, AFL-CIO v. Wisconsin Employment Relations Commission*, 427 U.S. 132, 96 S.Ct. 2548 (1976). *Bryan v. U.S.*, 338 U.S. 552, 70 S.Ct. 317 (1950), overruled by *Burks v. U.S.*, 437 U.S. 1, 98 S.Ct. 2141 (1978). *Spector Motor Service v. O'Connor*, 340 U.S. 602, 71 S.Ct. 508 (1951), overruled by *Complete Auto Transit, Inc. v. Brady*, 430 U.S. 274, 97 S.Ct. 1076 (1977). *Wilko v. Swan*, 346 U.S. 427, 74 S.Ct. 182 (1953) held that the Securities Act prohibited arbitration of disputes. Overruled by *Rodriguez de Quijas v. Shearson/American Exp., Inc.*, 490 U.S. 477, 109 S.Ct. 1917 (1989). *U.S. v. Bramblett*, 348 U.S. 503, 75 S.Ct. 504 (1955), overruled by *Hubbard v. U.S.*, 514 U.S. 695, 715, 115 S.Ct. 1754, 1765 (1995). *Yates v. U. S.*, 354 U.S. 298, 77 S.Ct. 1064 (1957), overruled by *Burks v. U.S.*, 437 U.S. 1, 98 S.Ct. 2141 (1978). *Morey v. Doud*, 354

U.S. 457, 77 S.Ct. 1344 (1957), overruled by *City of New Orleans v. Dukes*, 427 U.S. 297, 96 S.Ct. 2513 (1976). *Roth v. U.S.*, 354 U.S. 476, 484, 77 S.Ct. 1304, 1309 (1957) and *A Book Named "John Cleland's Memoirs of a Woman of Pleasure" v. Attorney General of Massachusetts*, 383 U.S. 413, 418, 86 S.Ct. 975, 977 (1966) (plurality opinion) held speech was unprotected obscenity if "the material is utterly without redeeming social value." Abrogated by *Miller v. California*, 413 U.S. 15, 24, 93 S.Ct. 2607, 2615 (1973) (third criteria in *Roth* changed to: "do not have serious literary, artistic, political, or scientific value."). *Forman v. U.S.*, 361 U.S. 416, 80 S.Ct. 481 (1960), overruled by *Burks v. U.S.*, 437 U.S. 1, 98 S.Ct. 2141 (1978). *Jones v. U.S.*, 362 U.S. 257, 80 S.Ct. 725 (1960), overruled by *U. S. v. Salvucci*, 448 U.S. 83, 100 S.Ct. 2547 (1980). *Monroe v. Pape*, 365 U.S. 167, 81 S.Ct. 473 (1961) held local governments were immune from litigation under 42 U.S.C. § 1983. Overruled by *Monell v. Department of Social Services of City of New York*, 436 U.S. 658, 98 S.Ct. 2018 (1978). *Townsend v. Sain*, 372 U.S. 293, 83 S.Ct. 745 (1963), overruled by *Keeney v. Tamayo-Reyes*, 504 U.S. 1, 112 S.Ct. 1715 (1992). *Parden v. Terminal Railway of Alabama State Docks Dept.*, 377 U.S. 184, 84 S.Ct. 1207 (1964) held that state-operated railroad could not plead sovereign immunity. Overruled by *Welch v. Texas Dept. of Highways and Public Transportation*, 483 U.S. 468, 107 S.Ct. 2941 (1987) and *College Savings Bank v. Florida Prepaid Postsecondary Education Expense Board*, 527 U.S. 666, 119 S.Ct. 2219 (1999). *General Motors Corp. v. Washington*, 377 U.S. 436, 84 S.Ct. 1564 (1964), overruled by *Tyler Pipe Industries, Inc. v. Washington State Dept. of Revenue*, 483 U.S. 232, 107 S.Ct. 2810 (1987) *Aguilar v. Texas*, 378 U.S. 108, 84 S.Ct. 1509 (1964), overruled by *Illinois v. Gates*, 462 U.S. 213, 103 S.Ct. 2317 (1983). *Swain v. Alabama*, 380 U.S. 202, 85 S.Ct. 824 (1965), overruled by *Batson v. Kentucky*, 476 U.S. 79, 106 S.Ct. 1712 (1986). See also *Allen v. Hardy*, 478 U.S. 255, 106 S.Ct. 2878 (1986) (per curiam). *Joseph E. Seagram & Sons, Inc. v. Hostetter*, 384 U.S. 35, 86 S.Ct. 1254 (1966), abrogated by *Healy v. Beer Institute, Inc.*, 491 U.S. 324, 109 S.Ct. 2491 (1989). *Albrecht v. Herald Co.*, 390 U.S. 145, 88 S.Ct. 869 (1968) held that vertical price fixing was a per se violation of antitrust statutes. Overruled by *State Oil Co. v. Khan*, 522 U.S. 3, 118 S.Ct. 275 (1997). *Maryland v. Wirtz*, 392 U.S. 183, 88 S.Ct. 2017 (1968), overruled by *National League of Cities v. Usery*, 426 U.S. 833, 96 S.Ct. 2465 (1976). (Usery was later overruled.) *U. S. v. Arnold, Schwinn & Co.*, 388 U.S. 365, 87 S.Ct. 1856 (1967), overruled by *Continental Television, Inc. v. GTE Sylvania Inc.*, 433 U.S. 36, 97 S.Ct. 2549 (1977). *Desist v. U.S.*, 394 U.S. 244, 89 S.Ct. 1030 (1969), disapproved of by *Griffith v. Kentucky*, 479 U.S. 314, 321-322, 107 S.Ct. 708, 712-713 (1987) (agreeing with Justice Harland's dissent in *Desist*). *Shapiro v. Thompson*, 394 U.S. 618, 89 S.Ct. 1322 (1969), overruled in part by *Edelman v. Jordan*, 415 U.S. 651, 94 S.Ct. 1347 (1974). *O'Callahan v. Parker*, 395 U.S. 258, 89 S.Ct. 1683 (1969) held that military personnel could not be tried in military courts for crimes unrelated to their military service. Overruled by *Solorio v. U.S.*, 483 U.S. 435, 107 S.Ct. 2924 (1987). *North Carolina v. Pearce*, 395 U.S. 711, 89 S.Ct. 2072 (1969) held that there was a presumption of vindictiveness (and denial of due process) when the sentence at trial was greater than in a previous trial or plea bargain. Overruled by *Alabama v. Smith*, 490 U.S. 794, 109 S.Ct. 2201 (1989). *Durham v. U.S.*, 401 U.S. 481, 91 S.Ct. 858 (1971), overruled by *Dove v. U. S.*, 423 U.S. 325, 96 S.Ct. 579 (1976). *California v. LaRue*, 409 U.S. 109, 93 S.Ct. 390 (1972), disagreed with by 44 *Liquormart, Inc. v. Rhode Island*, 517 U.S. 484, 516 (1996) ("Without questioning the holding in *LaRue*, we now disavow its reasoning insofar as it relied on the Twenty-first Amendment."). *Bonelli Cattle Co. v. Arizona*, 414 U.S. 313, 94 S.Ct. 517

point of the brief. The Amicus, like the Defendants, are flawed humans, but they left behind the lies of the LGBTQ church, converting to a new identity narrative that accords with their self-evident design.

(1973), overruled by *Oregon ex rel. State Land Bd. v. Corvallis Sand & Gravel Co.*, 429 U.S. 363, 97 S.Ct. 582 (1977). *Procurier v. Martinez*, 416 U.S. 396, 94 S.Ct. 1800 (1974), overruled in *Thornburgh v. Abbott*, 490 U.S. 401, 109 S.Ct. 1874 (1989). *U. S. v. Jenkins*, 420 U.S. 358, 95 S.Ct. 1006 (1975), overruled by *U.S. v. Scott*, 437 U.S. 82, 98 S.Ct. 2187 (1978). *Meek v. Pittenger*, 421 U.S. 349, 95 S.Ct. 1753 (1975) absolutely prohibited tax money being disbursed to religious elementary and secondary schools for education of pupils. Overruled by *Mitchell v. Helms*, 530 U.S. 793, 120 S.Ct. 2530 (2000). *National League of Cities v. Usery*, 426 U.S. 833, 96 S.Ct. 2465 (1976), overruled by *Garcia v. San Antonio Metropolitan Transit Authority*, 469 U.S. 528, 105 S.Ct. 1005 (1985). *Wolman v. Walter*, 433 U.S. 229, 97 S.Ct. 2593 (1977), overruled by *Mitchell v. Helms*, 530 U.S. 793, 120 S.Ct. 2530 (2000). *Arkansas v. Sanders*, 442 U.S. 753, 99 S.Ct. 2586 (1979), abrogated by *California v. Acevedo*, 500 U.S. 565, 111 S.Ct. 1982 (1991). *Parratt v. Taylor*, 451 U.S. 527, 101 S.Ct. 1908 (1981), overruled by *Daniels v. Williams*, 474 U.S. 327, 106 S.Ct. 662 (1986). *City of Akron v. Akron Center for Reproductive Health, Inc.*, 462 U.S. 416, 103 S.Ct. 2481 (1983), overruled by *Planned Parenthood of Southeastern Pennsylvania v. Casey*, 505 U.S. 833, 112 S.Ct. 2791 (1992). *School District of City of Grand Rapids v. Ball*, 473 U.S. 373, 105 S.Ct. 3216 (1985) and *Aguilar v. Felton*, 473 U.S. 402, 105 S.Ct. 3232 (1985) held that teachers paid by taxpayers could not teach in schools operated by religions. Overruled by *Agostini v. Felton*, 521 U.S. 203, 117 S.Ct. 1997 (1997). *Thornburgh v. American College of Obstetricians and Gynecologists*, 476 U.S. 747, 106 S.Ct. 2169 (1986), overruled by *Planned Parenthood of Southeastern Pennsylvania v. Casey*, 505 U.S. 833, 112 S.Ct. 2791 (1992). *Bowers v. Hardwick*, 478 U.S. 186, 106 S.Ct. 2841 (1986) held valid a Georgia statute that criminalized sodomy between two consenting adults. Overruled by *Lawrence v. Texas*, 539 U.S. 558, 123 S.Ct. 2472 (2003). *Booth v. Maryland*, 482 U.S. 496, 107 S.Ct. 2529 (1987), overruled by *Payne v. Tennessee*, 501 U.S. 808, 111 S.Ct. 2597 (1991). *South Carolina v. Gathers*, 490 U.S. 805, 109 S.Ct. 2207 (1989), overruled by *Payne v. Tennessee*, 501 U.S. 808, 111 S.Ct. 2597 (1991). *Pennsylvania v. Union Gas Co.*, 491 U.S. 1, 109 S.Ct. 2273 (1989), overruled by *Seminole Tribe of Florida v. Florida*, 517 U.S. 44, 116 S.Ct. 1114 (1996). *Grady v. Corbin*, 495 U.S. 508, 110 S.Ct. 2084 (1990), overruled by *U.S. v. Dixon*, 509 U.S. 688, 113 S.Ct. 2849 (1993). *Metro Broadcasting, Inc. v. F.C.C.*, 497 U.S. 547, 110 S.Ct. 2997 (1990) held that governmental favoritism for some racial groups could be justified if they were “substantially related to achievement of legitimate government interest”. Overruled by *Adarand Constructors, Inc. v. Peña*, 515 U.S. 200, 115 S.Ct. 2097 (1995), which applied strict scrutiny standard to all racial classifications. *Walton v. Arizona*, 497 U.S. 639, 110 S.Ct. 3047 (1990) held that a judge alone could impose the death penalty. Overruled by *Ring v. Arizona*, 536 U.S. 584, 122 S.Ct. 2428 (2002), which held that a jury must recommend the death penalty.

The Court should grant leave to file because while in the wake of *Obergefell v. Hodges*, 135 S. Ct. 2584 (2015), there has been no landrush on gay marriage, there has been a landrush on the LGBTQ church to infiltrate elementary schools with the intent of indoctrinating minors to a worldview on sex that is questionably legal, moral, and obscene and clearly non-secular. The Supreme Court has emphasized that there are “heightened concerns with protecting freedom of conscience from subtle coercive pressure in the elementary and secondary public schools,” *Lee v. Weisman*, 505 U.S. 577, 592 (1992), and the federal courts have thus “been particularly vigilant in monitoring compliance with the Establishment Clause” in the public-school context, see *Edwards v. Aguillard*, 482 U.S. 578-583 (1987). These “heightened concerns” should compel this Honorable Court to grant leave for *Amicusto* file so that children can be better safeguarded.

By granting leave, the Court will be in a better position to make the correct decision that might restore Constitutional integrity and the Court’s inherent authority. As African American Christian Pastors, *Amicus*, have a vested interest in not allowing the Government establish the religion of Secular Humanism as the National religion. As African American Pastors, *Amicus*, have a vested interest in not allowing Moral Relativists in office to hijack and misappropriate the Fourteenth Amendment. The *Amicus* does not want the government telling people who have been seduced into buying into the LGBTQ ideology that they cannot leave it behind. They can. They can transformed and redeemed, and set free - just like Greg Quinlan, Stephen Black, Robin Goodspeed, and others have been. The Democrats have alienated everyone through their brain dead power grab approach predicated on a series of imperialistic power plays. It is time that the Courts tell the truth, and the truth is that the Democrats are going to have to stop pushing identity politics. The government is going to have to get out of the parody marriage business, and the

government is not going to be allowed to enforce sexual orientation discrimination statutes that have hurt Jack Phillips yes, but put people like Lisa Bouch from WW Bridal out of business. It is time to put the Colorado Civil Rights Commission's efforts to entangle the government with Secular Humanism through coercive targeting of Christians out of business for good.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document and attached exhibits were mailed with adequate postage to the Defendants and Plaintiffs in this actions on August 27, 2018 to James A. Campbell ALLIANCE DEFENDING FREEDOM 15100 N. 90th Street Scottsdale, AZ 85260; JESSICA POCOCK, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; ANTHONY ARAGON, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; AUBREY ELENIS, Director Colorado; Civil Rights Commission 1560 Broadway

Denver, CO 80202; MIGUEL "MICHAEL" RENE ELIAS, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; CAROL FABRIZIO, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; CHARLES GARCIA, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; RITA LEWIS, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; CYNTHIA H. COFFMAN Colorado Attorney General Office of the Attorney General Ralph L. Carr Judicial Building 1300 N. Broadway, 10th Floor Denver, CO 80203; JOHN HICKENLOOPER Colorado Governor Office of the Governor 136 State Capitol Building Denver, CO 80203

/s/Anna C. Little, Esq./

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

<p>MASTERPIECE CAKESHOP INCORPORATED, a Colorado corporation; and JACK PHILLIPS, Plaintiffs,</p> <p>Intervening Plaintiffs GRACE HARLEY, Special Forces Of Liberty, SGM JOHN GUNTER JR., Special Forces Of Liberty, 1LT CHRIS SEVIER ESQ., De Facto Attorney Generals, WHITNEY KOHL, Special Forces Of Liberty</p> <p>V.</p> <p>AUBREY ELENIS, Director of the Colorado Civil Rights Division, in her official and individual capacities; ANTHONY ARAGON, as member of the Colorado Civil Rights Commission, in his official capacity; MIGUEL “MICHAEL” RENE ELIAS, as member of the Colorado Civil Rights Commission, in his official capacity; CAROL FABRIZIO, as member of the Colorado Civil Rights Commission, in her official capacity; CHARLES GARCIA, as member of the Colorado Civil Rights Commission, in his official capacity; RITA LEWIS, as member of the Colorado Civil Rights Commission, in her official capacity; JESSICA POCOCK, as member of</p>		<p>Case No: 1:18-cv-02074-WYD-STV</p>
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<p>the Colorado Civil Rights Commission, in her official capacity; CYNTHIA H. COFFMAN, Colorado Attorney General, in her official capacity; and JOHN HICKENLOOPER, Colorado Governor, in his official capacity, Defendants.</p>		
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BRIEF AMICUS CURIAE OF THE CENTER FOR GARDEN STATE FAMILIES IN SUPPORT OF THE PLAINTIFFS AND IN SUPPORT OF THE INTERVENING PLAINTIFFS

Understanding The Marriage And Constitution Restoration Act for Colorado - <https://youtu.be/VhFM-Hg7298>

<https://www.gardenstatefamilies.org/>

<http://marriageandconstitutionrestorationact.com/>

<https://www.facebook.com/marriageact/>

CORPORATION DISCLOSURE STATEMENT

Amicus states that it does not have a parent corporation, nor does it issue any stock.

QUESTIONS PRESENTED

1. Have the Defendants actions violated the Plaintiffs' Free Exercise and Free Speech rights under the First Amendment and Equal Protection and Due Process Rights under the Fourteenth Amendment by enforcing Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III)?
-yes
2. Does the State's enforcement of Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) violate the three prongs of *Lemon* test under the Establishment Clause for (1) lacking a secular purposes, for (2) creating an indefensible legal weapon against non-observers, and for (3) fostering the government's excessive entanglement with the religion of postmodern western moral relativism and expressive individualism - i.e. Secular Humanism and does the Plaintiffs have the standing as injured taxpayers to enjoin the Defendants from enforcing Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) under taxpayer standing doctrines?

-Yes

3. Because there are thousands of ex-gays does not that fact prove that there are no such thing as “gay people” or “transgender people” and that there are only people who self-identify as gay or transgender?

-Yes

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<i>Quiban v. Veterans Administration</i> , 928 F.2d 1154 (D.C. Cir. 1991)	

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Real Alternatives, Inc. v. Burwell,
150 F. Supp. 3d 419 (M.D. Pa. 2015)2, 3

Real Alternatives, Inc. v. Sec'y Dep't of Health & Human Servs.,
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Reed v. Reed,
404 U.S. 71 (1971)5

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Washington Ethical Society v. District of Columbia,
101 U.S. App. D.C. 371, 249 F.2d 127 (1957)2

Ward v. Polite,
667 F.3d 727, 735 (6th Cir. 2012)19

Welsh v. U.S.,
1970398 U.S. 333 (U.S. Cal. June 15)2

Other Materials

American Association for Retired People (AARP) recently published an article telling the stories of senior adults whose sexual attractions and identifications changed over time (Dr. Pepper Schwartz, “Can Sexual Preference Change With Age?” <http://www.aarp.org/home-family/sex-intimacy/info-2014/gay-lesbian-sexual-preference-schwartz.html?intcmp=AE-HOME-TOENG-TOGL>)8

African American ex-gay Grammy winner Donnie McClurkin removed from singing at Martin Luther King memorial concert following complaints by gay leaders (<http://www.christianpost.com/news/ex-gay-community-baptist-leadership-say-dc-officials-are-infringing-on-pastors-civil-rights-102212>)

.....23
 District of Columbia Superior Court orders the D.C. Office of Human Rights to recognize ex-gays as a protected class for purposes of sexual orientation nondiscrimination (June 26, 2009), (<http://pfox.org/Court-Rules-Sexual-Orientation-Laws-Include-Former-Homosexuals.html>)

.....7
 Chirlane McCray no longer identifies as a lesbian after marrying and having family with New York City Mayor Bill de Blasio (<http://nypost.com/2012/12/11/bill-wife-speak-out>; <http://observer.com/2012/12/the-lesbian-past-of-bill-de-blasios-wife>)

.....8
 2 Encyclopaedia of the Social Sciences,

.....2
 Ex-gays are reviled, ridiculed, and marginalized
 (<http://www.christianpost.com/news/former-gay-activist-marries-woman-addresses-critics-who-condemn-his-new-heterosexual-lifestyle-110736>)

.....21
 Former homosexuals targeted because they exist
 (http://www.nytimes.com/2011/06/19/magazine/my-ex-gay-friend.html?pagewanted=all&_r=0)

.....21
 Center for Garden State Families (<https://www.gardenstatefamilies.org>)

.....1
 Gay leaders criticize presidential candidate Barack Obama for allowing Donnie McClurkin to sing at a fundraiser and insist he drop the singer from the program
 (<http://www.youtube.com/watch?v=A3jkeTdgLrg>)

.....23
 Gay, Lesbian and Straight Education Network (GLSEN), American Association of School Administrators, and the Association for Supervision and Curriculum Development Guidelines include recognition of ex-gays. (<http://nea-exgay.org/2006/03/15/sexual-orientation-consensus-guidelines-include-ex-gays>)

.....8
 Gay rights groups are wielding their considerable political power to aggressively oppose and outlaw counseling and therapy for men, women and children who struggle with unwanted same-sex attraction. These activities, carried on by organizations such as The National Center for Lesbian Rights (<http://www.nclrights.org/explore-the-issues/bornperfect/>), Southern Poverty Law Center (<http://www.splcenter.org/conversion-therapy>)

.....24
 Human Rights Campaign (<http://pfox-exgays.blogspot.com/2012/05/wacky-wayne-besen.html>)

.....24
 J. Archer, *Faiths Men Live By* 120—138, 254—313 (2d ed. revised by Purinton 1958)

.....2
Montgomery County Maryland public schools superintendent acknowledges the contributions of an ex-gay representative on the district’s Citizens Advisory Committee for Family Life and Human Development (2011) (<http://pfox-exgays.blogspot.com/2011/10/letter-posted.html>)

.....23
NEA recognizes Ex-Gay Educators’ Caucus (<http://nea-exgay.org/about/>)

.....9
Pepsi Co’s Corporate Counsel issues opinion memorandum on December 28, 2012 confirming ex- gays are protected from workplace sexual orientation discrimination (<http://pfox.org/CivilRights.pdf>)

.....8
Recent judicial victories in same-sex marriage cases have empowered animus by equating the legalization of same-sex marriage with the justification that ex-gays should therefore be banished from society and not allowed to participate in the public square of ideas and commerce (http://www.huffingtonpost.com/alec-fischer/this-is-what-happened-whe_1_b_6068712.html)

.....24
U.S. Department of Education’s former Assistant Secretary of Safe and Drug Free Schools Kevin Jennings agrees on June 8, 2011 that ex-gays should not be discriminated against during outreach efforts for students with unwanted same-sex attractions (<http://www.prnewswire.com/news-releases/departing-safe-schools-czar-met-with-pfox-to-discuss-ex-gays-123447044.html>)

.....7
Washington D.C. Mayor Adrian Fenty, in response to complaints from gay organizations, apologized for issuing a certificate of appreciation to an ex-gay organization. Yet in signing gay marriage legislation for the nation’s capital, the mayor had promised equality for all D.C. residents (http://voices.washingtonpost.com/dc/2010/04/fenty_a_pologizes_for_honoring.html)

.....23
World Bank removed Amicus Parents and Friends of Ex-gay & Gays, a non-profit corporation, from its charitable fundraising program after receiving complaints from the Human Rights Campaign, (<http://www.hrc.org/press-releases/entry/hrc-to-world-bank-remove-pfox-from-your-community-connections-campaign>)

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INTEREST OF AMICUS CURIAE

The Mission of The Center for Garden State Families is to protect and promote faith, freedom and the natural family, in culture and public policy.¹ The Center for Garden State Families is a national non-profit organization that has supported, since its inception, many thousands of families of individuals with unwanted same-sex attraction who have made the personal decision to leave homosexuality. The Center for Garden State Families advocates for the ex-gay community and educates the public about sexual orientation. The Center for Garden State Families appears as *Amicus* to address the purported immutability of homosexuality, which is relevant to whether the judicial, legislative, and executive branches should continue to treat sexual orientation as a new suspect class or whether they should treat sexual orientation mythology as a matter of religion.² The evidence shows that all forms of parody marriage policy, to include “gay marriage,” are non-secular and promote the religion of Secular Humanism. Likewise, the making of Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) was non-secular state action and the enforcement of those statutes create indefensible legal weapons against the non-observers of the religion of Secular Humanism, while excessively entangling the government with the religion of Secular Humanism. The Supreme

¹ <https://www.gardenstatefamilies.org/>. The Center for Garden State Families focuses on Freedom of Religion Freedom of Speech, Freedom of the Press, The Right of Assembly Redress of Grievances, and opposing the alleged special rights of sexual minorities (LGBT).

² The Center for Garden State Families affirms sexual orientation is a fluid, transient, personal characteristic, and that individuals can and do change their sexual orientation and therefore self-asserted sex-based identity narratives that are questionably real, moral, and legal are not secular and are an extension of the church of Secular Humanism, Postmodern Western Moral Relativism, and Expressive Individualism. While all individuals are free to self-identify as whatever they want, neither the State nor the Federal Government can legally recognize parody marriages because parody marriage policies put the religion of Secular Humanism over non-religion.

Court recognized in *Torcaso v. Watkins*, 367 U.S. 488 (1961) and *Edwards v. Aguillard*, 482 U.S. 578, n 6. (1987) that Secular Humanism is a religion for purposes of the First Amendment Establishment Clause.³ For any branch of government to legally recognize parody marriages as real or to make and enforce statutes that are based on the idea that sexual orientation is a matter of civil rights excessively entangles the government with the religion of Secular Humanism, putting religion over non-religion.⁴ This include the Defendants enforcement of Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III). There are millions of people who do not want their taxpayer dollars going towards promoting policies that cause the government to endorse the religion of Secular Humanism to include the Amicus who was once

³ The Supreme Court found that non-institutionalized religions are regulated by the Establishment Clause in *Torcaso v. Watkins*, 367 U.S. 488 (1961) stating that “among religions in this country, which do not teach what would generally be considered a belief in the existence of God, are Buddhism, Toaism, Ethical Culture, Secular Humanism, and others.” See also *Washington Ethical Society v. District of Columbia*, 101 U.S. App. D.C. 371, 249 F.2d 127 (1957); 2 Encyclopaedia of the Social Sciences, 293; J. Archer, *Faiths Men Live By* 120—138, 254—313 (2d ed. revised by Purinton 1958); Stokes & Pfeffer, *supra*, n. 3, at 560. *Welsh v. U.S.*, 1970398 U.S.333 (U.S. Cal. June15); See also *Edwards v. Aguillard*, 482 U.S. 578, 583 (1987)“we did indeed refer to "Secular Humanism" as a "religio[n]."); In *Real Alternatives, Inc. v. Burwell*, 150 F. Supp. 3d 419, 440—41 (M.D. Pa. 2015), *aff'd sub nom. Real Alternatives, Inc. v. Sec'y Dep't of Health & Human Servs.*, No. 16-1275, 2017 WL 3324690 (3d Cir. Aug. 4, 2017), the court stated: “We detect a difference in the “philosophical views” espoused by [the plaintiffs], and the “secular moral system[s]...equivalent to religion except for non-belief in God” that Judge Easterbrook describes in *Center for Inquiry*, 758 F.3d at 873. There, the Seventh Circuit references organized groups of people who subscribe to belief systems such as Atheism, Shintoism, Janism, Buddhism, and secular humanism, all of which “are situated similarly to religions in everything except belief in a deity.” *Id.* at 872. These systems are organized, full, and provide a comprehensive code by which individuals may guide their daily activities. Instead having a cross or the ten commandments, the LGBTQ church has the gay pride flag and their own commandments, such as if you disagree with LGBTQ ideology you are a bigot worth marginalizing.

⁴ Just as government officials may not favor or endorse one religion over others, so too officials “may not favor or endorse religion generally over non-religion.” *Lee v. Weissman*, 505 U.S. 577, 627, 112 S.Ct. 2649, 120 L.Ed.2d 467 (1992)(Souter, Justice, concurring)(citing *County of Allegheny v. ACLU*, 492 U.S. 573, 589-94, 109 S.Ct. 3086, 106 L.Ed.2d 472 (1989)

part of the LGBTQ religion and knows first hand how dangerous and faith-based it is. Alliance Defending Freedom has good lawyers who are good people. But they are not making the right argument in this case. The strongest cause of action that Plaintiff Phillips can make is that the enforcement of Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) fails prong two of *Lemon*. As taxpayers in Colorado, the Plaintiffs, and the intervening Plaintiffs, have standing to ask the Article III Court to enforce the Establishment Clause by enjoining the Defendants from enforcing Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) against anyone non-observer of the religion of Secular Humanism in Colorado, not just Jack Phillips and Masterpiece Cakeshop. The Special Forces of Liberty, the De Facto Attorney Generals, the *Amicus*, and others have asked Rep. Humphrey, Rep. Ransom and Sen. Neville to carry an act to be entitled the Marriage And Constitution Restoration Act and a concurrent resolution that resolves that Secular Humanism is a religion as the Supreme Court itself has recognized. The Special Forces Of Liberty, the Amicus, and other authored the bill in response to the systematic religious persecution of the Plaintiffs. Here is what all parties need to understand. Twenty states have agreed to introduce the Marriage And Constitution Restoration Act at the 2019 legislative session. So has the Federal Congress. While Colorado is a purple state the Marriage And Constitution Restoration Act will pass in the deep red states, where Attorney Generals who have the ability to understand their duties under Article VI are prepared to defend the Marriage And Constitution Restoration Act, abandoning the unprincipled ploy to entangle the government with the LGBTQ church.

SUMMARY OF THE ARGUMENT

This brief confirm⁵s the growing recognition of the ex-gay community by the courts, government bodies, and business entities and presents the real-life, personal stories of four individuals who have done exactly what the district court in *Hollingsworth v. Perry*⁶ concluded was impossible: they chose to change their sexual orientation and now live in opposite-sex relationships despite having been previously deeply entrenched in same-sex relationships. These individuals converted to a new identity narrative. “Converted” is the right word to use because sexual orientation orthodoxy is religious in nature. The stories demonstrate that, in fact, sexual orientation is not immutable—either in the sense that it is a trait determined solely by “accident of birth” or in the sense that it cannot be changed— but is a fluid, transient, personal characteristic that can and does change. The Defendants need to knock it off and stop treating sexual orientation as anything other than a religious ideology. It certainly has nothing to do with civil rights and neither do Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III). The testimonials add to the numerous sworn statements by ex-gays that are already in the record at hand. The testimonies prove that the LGBTQ community is a church - a organized faith-based community with its own private moral code that is inseparably linked to the religion of Secular Humanism. Millions of people - in fact the majority - find LGBTQ ideology to be non-secular, dishonest, and obscene to the point that it materially erodes

⁵ No counsel for a party authored this brief in whole or in part, and no counsel or party made a monetary contribution to the preparation or submission of this brief.

⁶ Finding of fact No. 46 stated: “Individuals do not generally choose their sexual orientation. No credible evidence supports a finding that an individual may, through conscious decision, therapeutic intervention or any other method, change his or her sexual orientation.” *Perry v. Schwarzenegger*, 704 F. Supp. 2d 921, 966 (N.D. Cal. 2010).

community standards of decency.⁷ The LGBTQ church is “[highly] organized, full, and provide[s] a comprehensive code by which individuals may guide their daily activities.” See *Real Alternatives, Inc. v. Burwell*, 150 F. Supp. 3d 419, 440–41 (M.D. Pa. 2015), *aff’d sub nom. Real Alternatives, Inc. v. Sec’y Dep’t of Health & Human Servs.*, No. 16-1275, 2017 WL 3324690 (3d Cir. Aug. 4, 2017). The gay pride rainbow colored flag is a religious symbol. Just as Christians have the cross, Jews have the Ten Commandments, and Muslims have the star and crescent, the LGBTQ church has the gay pride rainbow colored flag. The idea that (1) people are born gay, that (2) people can be born in the wrong body, that (3) people can come out of a closet and be baptized gay, and that (4) if you disagree with those ideas you are bigot are hyper religious truth claims that take a huge amount of faith to believe are plausible. The Amicus defends the rights of the self-identified transgender individuals to self-identify as “transgender” under the Free Speech and Free Exercise Clause of the First Amendment. But Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) in both their making and in their enforcement manage to fail all three prongs of the *Lemon* Test.

There are millions of people living in the United States who do not want their taxpayer dollars going to promote and advance the LGBTQ communities religious beliefs about sex, faith, truth, morality, and marriage to include the *Amicus*. Neither does the Plaintiffs or the intervening Plaintiffs. The issue is important because the three branches of government can no longer pretend that sexual orientation is immutable declaring it a “suspect class” for purposes of the Equal Protection Clause in light of overwhelming evidence that to suggest otherwise is an act of

⁷ The enforcement of Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) has the effect of eroding community standards of decency, which has secondary harmful effects.

Constitutional and political malpractice. Falsely treating sexual orientation as a civil rights matter improperly subjects state laws or state Constitutional provisions to “strict scrutiny” rather than the existing, legally appropriate, “rational basis” review.

This brief does not detail the extensive medical and scientific evidence corroborating that sexual orientation is changeable and mutable, as that issue has been thoroughly briefed by *Amicus* filers, Dr. Tara King and Dr. Michelle Cretella in the Coalition of Doctors defending Reparative Therapy. Rather, this brief personalizes the scientific and medical evidence via powerful biographical stories representing the actual experiences of many thousands of former homosexuals. It concludes with a discussion of the significant animus ex-gays experience, largely at the hands of gays, as a result of the unwarranted commitment to the phony gay immutability narrative. While it was self-identified homosexuals who imposed gay marriage on all 50 states by colluding with the Secular Humanist on the bench through a series of emotional appeals in *U.S. v. Windsor*, 133 S.Ct. 2675 (2013) and *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015), it will be testimony of ex-gays that forces all aspects of the government to disentangle itself from endorsing any form of parody marriage and from enforcing any statute like Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III). The wrong Constitutional narrative was being litigated in *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015) at all times. The Plaintiff is not framing the legal matter right for different reasons that are not necessarily valid. The right Constitutional prescription has been raised by the Marriage And Constitution Restoration Act and is raised by the amicus, which balances the Free Exercise Clause and the Establishment Clause of the First Amendment of the United States Constitution, which informs both the State and Federal government how to respond to marriage requests of all

kinds that do not involve a man and woman and how the government must react to self-asserted sex-based identity narratives that are questionable real, moral, and indecent. The fact of the matter is Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) fails all three prongs of Lemon, and that is the argument that Plaintiffs needs to make and that the intervening Plaintiffs are making. So is the *amicus*.

ARGUMENT

I. Sexual orientation is not an immutable characteristic “determined solely by the accident of birth” and, thus, cannot be a suspect class.

As expounded in the *Amicus* brief by the Coalition of Doctors Defending Reparative Therapy, sexual orientation fails the Court’s standard for heightened scrutiny and fails to have any connect with the Due Process and Equal Protection Clauses because it is not immutable. Both the Federal and State Courts lack subject matter jurisdiction over all issues dealing with sexual orientation because the Establishment Clauses bars the government from even coming near the subject because it is predicated on a series of naked assertions and unproven faith based assumptions that are at the very least implicitly religious.

Every class to which the Supreme Court has applied heightened scrutiny and declared a suspect class is defined by an immutable characteristic.⁸ Moreover, the Supreme Court has refused to apply heightened scrutiny to classes that are not marked by an immutable characteristic.⁹ The Courts’ jurisprudence makes clear that immutability is a necessary condition for recognizing a new protected class. The idea of the Supreme Court shoehorning

⁸ *Parham v. Hughes*, 441 U.S. 347, 351 (1979) (citing *McLaughlin v. Florida*, 379 U.S. 184 (1964) (race); *Oyama v. California*, 332 U.S. 633 (1948) (national origin); *Graham v. Richardson*, 403 U.S. 365 (1971) (alienage); *Gomez v. Perez*, 409 U.S. 535 (1973) (illegitimacy); *Reed v. Reed*, 404 U.S. 71 (1971) (gender)).

⁹ *E.g.*, *Plyler v. Doe*, 457 U.S. 202, 220 (1982) (undocumented aliens); *Lyng v. Castillo*, 477 U.S. 635, 639 (1986) (close relatives).

homosexuality into a fake civil rights narrative is an act of overt judicial malpractice, which shows that gay marriage policy is a non-secular sham in violation of prong one of *Lemon*.¹⁰

The Courts' precedents teach that immutability denotes a characteristic "determined solely by the accident of birth." *Frontiero v. Richardson*, 411 U.S. 677, 686 (1973). As then-Judge Ginsburg explained, "the 'immutable characteristic' notion . . . does not mean, broadly, something done that cannot be undone. Instead, it is a trait 'determined solely by accident of birth.'"¹¹ Far from being an immutable characteristic determined at birth like race or gender, sexual orientation is a complex and amorphous phenomenon that defies consistent and uniform definition. The evidence embodied in this brief adds to the scholarly record amassed by the Coalition of Doctors Defending Reparative Therapy to show that, however defined, sexual orientation can shift over time and does shift for a significant number of people. Indeed, many individuals freely choose to change their sexual orientation. Thus, while the nature and determinants of sexual orientation are not fully understood, sexual orientation is mutable for purposes of Equal Protection analysis, as it is not "determined solely by accident of birth."

Frontiero v. Richardson, 411 U.S. 677, 686 (1973) (plurality).

II. Recognition of ex-gays as a group, by government authorities and other organizations, undermines the assertion that sexual orientation is immutable.

In addition to the compelling personal stories of ex-gays discussed below, a growing number of governmental authorities, organizations, and influential individuals recognize the

¹⁰ That is, the manifest dishonesty of Secular Humanists on the bench in allowing the fake gay civil rights plight to be shoehorned into phony Fourteenth Amendment narratives - alone - shows that the gay marriage policies, conversion therapy bans, sexual orientation discrimination statutes are a sham.

¹¹ *Quiban v. Veterans Administration*, 928 F.2d 1154, 1160 n.13 (D.C. Cir. 1991) (quoting *Schweiker v. Wilson*, 450 U.S. 221, 229 n. 11 (1981)).

existence of thousands of ex- gays; that is, that there are individuals who have successfully changed their sexual orientation and are now living as heterosexuals even though they once lived as homosexuals. This is because homosexuality is a religion because identity narratives that are questionably moral are religious in nature and because a person can convert from one identity narrative to another, just like a person can convert from atheism to Christianity. LGBTQ orthodoxy is a series of unproven faith based assumptions that can only be taken on faith. The Defendants are only pretending that sexual orientation is a civil rights issue and that the underlying Constitutional legal basis for Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) is the Fourteenth Amendment. They are not telling the truth due to a because as Secular Humanism themselves, they want the government to endorse the religious worldview that they have based their entire identity on due to a refusal to think logically.

In *PFOX v. Government of the District Office of Human Rights*, No. 2008 CA 003662, slip. op. at 12 (D.C. June 26, 2009), the District of Columbia Superior Court ordered the D.C. Office of Human Rights to recognize ex-gays as a protected class for purposes of sexual orientation nondiscrimination.¹² But the truth is that sexual orientation is not a protected class for anyone because it is a mythology and theocratic doctrinal dogma that is inseparably linked to the religion of Secular Humanism. Nevertheless, when it comes to ex-gays, Kevin Jennings, former Assistant Secretary of Safe and Drug Free Schools, U.S. Department of Education, agreed in 2010 that ex-gays should not be discriminated against during outreach efforts for students with unwanted same-sex attractions.¹³ The superintendent of Montgomery County, Maryland public

¹²<http://pfox.org/Court-Rules-Sexual-Orientation-Laws-Include-Former-Homosexuals.html>

¹³(<http://www.prnewswire.com/news-releases/departing-safe-schools-czar-met-with-pfox-to-discuss-ex-gays-123447044.html>).

schools, the 17th largest school district in the United States, in 2011 acknowledged the contributions of an ex-gay representative who served on the district's Citizens Advisory Committee for Family Life and Human Development.¹⁴ On December 28, 2012, PepsiCo, a Fortune 500 company, by and through its legal counsel, acknowledged in a written legal opinion memorandum that its workplace policy against sexual orientation discrimination includes non-discrimination against former homosexuals as a protected class.¹⁵ According to Charles Haynes, primary drafter of the Public Schools and Sexual Orientation Consensus Guidelines released by the First Amendment Center, the ex-gay viewpoint in public schools should be heard. The Guidelines are endorsed by the Gay, Lesbian and Straight Education Network (GLSEN), American Association of School Administrators, and the Association for Supervision and Curriculum Development.¹⁶ And every year, the National Education Association's officially recognized Ex-Gay Educators Caucus participates in and hosts a booth at the NEA's conference.¹⁷ Just as a person can convert from Judaism to Christianity or Christianity to Islam, a person can convert their identity narrative from straight to zoophile to polygamist to heterosexual.¹⁸ Heterosexuality - like natural marriage - is based on self-evident truth and is, therefore, not religious in nature for purposes of the Establishment Clause.

¹⁴ (<http://pfox-exgays.blogspot.com/2011/10/letter-posted.html>).

¹⁵ (<http://pfox.org/CivilRights.pdf>).

¹⁶(<http://nea-exgay.org/2006/03/15/sexual-orientation-consensus-guidelines-include-ex-gays>).

¹⁷ (<http://nea-exgay.org/about>)

¹⁸ Chirlane McCray, a former lesbian, is married to New York City Mayor Bill de Blasio. In 1979, McCray wrote a front-page article for Essence magazine declaring, "I am a lesbian." But she met Mr. de Blasio, fell in love, and began a family with him. She no longer identifies as lesbian (<http://nypost.com/2012/12/11/bill-wife-speak-out>; <http://observer.com/2012/12/the-lesbian-past-of-bill-de-blasios-wife>)

On a partner website of the *Amicus* are the video-recorded testimony of twenty three former self-identified homosexuals telling their personal stories of how they came to identify as ex-gay (<http://www.pfox.org/personal-stories>), including the journeys of former homosexuals whose identical twins did not experience same-sex attraction.¹⁹ Transformation of same-sex attraction is so well recognized that the American Association for Retired People (AARP) recently published an article telling the stories of senior adults whose sexual attractions and identifications changed over time.²⁰ The article notes that some who identified as heterosexuals experience same-sex attractions as senior adults, while some who identified as gay or lesbian later experience opposite-sex attraction. Just because an emotion arises does not mean that the government should encourage the giving into emotions that are subversive to human flourishing, that are questionably moral, that tend to erode community standards of decency, and that not check out with our self-evident design. Government is tasked with staying away from matters involving sexual identity and with channeling sexual energy of its citizens in a manner where the objectively natural and healthy choice is the easy choice. Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) are not only unconstitutional they are objectively irrational, and so are the Defendants for treating the statutes and their enforcement against the honorable Plaintiffs, when they know that they never were.

III. The life stories of ex-gays evidences that sexual orientation is not an immutable characteristic.

¹⁹ <https://vimeo.com/100937787>; <https://vimeo.com/84169427>

²⁰ Dr. Pepper Schwartz, “Can Sexual Preference Change With Age?” <http://www.aarp.org/home-family/sex-intimacy/info-2014/gay-lesbian-sexual-preference-schwartz.html?intcmp=AE-HOME-TOENG-TOGL>

Any assertion that homosexuality is immutable is perhaps best disputed by the existence of a multitude of organizations in the United States and around the world who, like *Amicus*, have helped thousands of men and women leave unwanted homosexuality, change their orientation, and live heterosexual lives.²¹ For the Secular Humanists in office to ignore the testimony of the thousands of the ex-gays because it is politically expedient to be in denial, has the effect of relegating ex-gays to second class citizens. The three branches of government cannot engage in intellectual squinting in pretending that gay rights are like “race-based-civil rights,” which are actually based on immutability. For Secular Humanists in office to falsely equate sexual orientation to race, which actually is predicated on immutability as a matter of self-evident observation, is an act of fraud that manages to be racially, intellectually, emotionally, and sexually exploitative. This Court cannot ignore this evidence without committing judicial, political, and Constitutional malpractice; according, the Plaintiffs and intervening Plaintiffs are right, the State of Colorado must be enjoined from enforcing Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) and required to completely and totally disentangle itself from the LGBTQ community. The Establishment Clause requires that the entire gay civil rights charade promoted by the intellectually dishonest Colorado Civil Rights

²¹ In addition to *Amicus*, a partial list of the other organizations who in the United States and around the world provide assistance to those desiring to change their orientation is as follows: Courage (www.couragerc.net); The German Institute for Youth and Society (www.dijg.de); Homosexual Anonymous (www.ha-fs.org); International Healing Foundation (www.comingoutloved.com); Jews Offering New Alternatives for Healing, Inc. (<http://jonahweb.org>); Alliance for Therapeutic Choice and Scientific Integrity (www.therapeuticchoice.com); Restored Hope Network (www.restoredhopenetwork.com); Voices of Change (www.voices-of-change.org); Witness Freedom Ministries (<http://www.witnessfortheworld.org>); Parakaleo (www.parakaleo.co.uk); People Can Change (<http://www.peoplecanchange.com>); Positive Alternatives to Homosexuality (PATH) (<http://www.pathinfo.org>); True Freedom Trust (<http://www.truefreedomtrust.co.uk>); VENSER (<http://www.venser.org>); Regeneration Ministries (<http://www.regenerationministries.org>).

Commission and its devout Secular Humanists employees must completely end. Below are the stories of four individuals, two men and two women, each of whom represents many thousands of others who have successfully made this transition, and, therefore, support the Plaintiffs argument that these statutes cannot be enforce against the Plaintiffs or anyone else Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) ever again in any state. The fact that there are well-adjusted former homosexuals evidences that sexual orientation is not an immutable characteristic, that sexual orientation is a religious mythology inseparably linked to the religion of Secular Humanism and that the Establishment Clause has exclusive jurisdiction over whether the government can respect any form of parody marriage. It cannot - because doing so causes the government to violate all three prongs of *Lemon*. That is the argument that Plaintiffs should be making. Judge Mendenze, a former employee of the ACLU agrees, in his handling of *Sevier et al v. Hickenlooper et al*, 1:17-cv-01750 (COD 2017), where he unequivocally abused the powers of his office to censor the Plaintiffs for asking him to interpret the Constitution was written, and not as to how the ACLU pretends that it was for self-serving reasons.

A. Stephen Black's Story
<http://firststone.org/>

Stephen Black is an ex-gay who, after coming out of the homosexual lifestyle more than thirty years ago, married his wife Robin in 1986. They have three adult married children, one of whom is deceased, and two grandchildren. Stephen is an ordained minister and serves as the Executive Director of First Stone Ministries. Steve's journey is found at <https://vimeo.com/84171226>. Following are excerpts from his story, which proves that homosexuality is not immutable and has nothing in common with the Fourteenth Amendment.

“Sex became a distorted issue for me at an early age. I was molested about age six by a male friend of the family who was babysitting me. I was also exposed to some pornography at the same time. The porn was heterosexual, yet very devastating to my understanding of real love and sexuality. Several years later, our next-door neighbors had some out-of-state visitors. I was playing at their house, and was followed into the garage by the adult male visitor. He grabbed me from behind and began to molest me while warning me to keep quiet. After struggling with him for a few minutes, I got away. I was terrified at what had happened. I went home and never told anyone. I thought it was my fault, because in the heat of the summer, I had been wearing cut-off shorts with no shirt. About a year later, my family went on a trip to Colorado. We stayed with friends who had a son several years older than me. At bedtime, he began telling me about a "game" he had learned from a friend. That night, I was molested again, except this time I submitted to it because it was just a "game." A year later, he came to visit at my house and we "played the game" again. As I went through high school, I met other homosexual men and started going to gay bars. Soon I had a new goal: to be "married" to another man. Over the coming years, I pursued a marriage-type relationship with several men. I had one relationship that lasted two years. During this time, I started going back to the Catholic church. I was going to college and began living openly as a homosexual. My lover, Mike, was very wealthy and we lived in a beautiful home. I drove a new convertible and traveled to a lot of places. Several months later, my little brother died. We were only 18 months apart and, for the first time in years, I began praying earnestly. My relationship with Mike ended in a horrible fight; then I joined a health club, where I met a guy I thought was straight. But he had been exposed to homosexuality one other time earlier in his life, and was plagued with gay thoughts. Before long, we were sexually involved, even though he was married. I was torn up with guilt and developed an ulcer. My relationship with Mike ended in a horrible fight; then I joined a health club, where I met a guy I thought was straight. But he had been exposed to homosexuality one other time earlier in his life, and was plagued with gay thoughts. Before long, we were sexually involved, even though he was married. I was torn up with guilt and developed an ulcer. My former lover would call me up, crying over the phone and begging me to reconsider my decision to leave him. But the Lord led me to a wonderful church where people really loved Him. I began meeting weekly with my pastor, who became a spiritual father to me. He helped me to deal with the underlying root issues of my homosexual struggles, such as lust, anger and unforgiveness I also had to deal with the reality of being sexually abused as a child. When the anger and bitterness came pouring out, several men and women in my church prayed with me and ministered God's healing to my broken heart. Some months later, Robin began attending my church. We became friends and were eventually married on May 25, 1986. Today we have a very fulfilling marriage and are parents of three children [one deceased] and [two] grandchild[ren]. Marriage with a woman has brought me a deeper understanding of what it means to be a man. And marriage has revealed how selfish I really was, and how much I need to die to myself every day and love my wife like Christ loves the Church (Eph. 5:25).”²²

²² <https://vimeo.com/84171226>

It is clear from this testimony that homosexuality is a religious doctrine floated by the Secular Humanist church and that sexual orientation has nothing to do with immutability or the Fourteenth Amendment, and their for the Defendants cannot enforce Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III). Stephen Black's testimony - alone - shows that the decision in *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015) was a sham that must be overruled by the three branches of government by honoring its duty under Article VI²³ to enforce and uphold the Establishment Clause. The *Amicus* does not want its taxpayer dollars going toward entangling the government with the religion of Secular Humanism, Postmodern Western Individualistic Moral Relativism, and Expressive Individualism. This does not mean that individuals cannot self-identify as they see fit. The Free Exercise Clause allows that. It is the self-identified transgenders who should be making that argument, not the Plaintiffs. It is simply the case that government cannot legally recognize any parody form of marriage, not just gay marriage, nor can it make and enforce reckless statutes like Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) because doing so has the effect of excessively entangling the government with the religion of Secular Humanism, which then relegates ex-gays and other non-observers of the religion of Secular Humanism to second class citizens, putting them in danger.

B. Richard Cohen's Story

²³ Article VI reads as follows: This Constitution, and the laws of the United States which shall be made in pursuance thereof; and all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land; and the judges in every state shall be bound thereby, anything in the Constitution or laws of any State to the contrary notwithstanding. The Senators and Representatives before mentioned, and the members of the several state legislatures, and all executive and judicial officers, both of the United States and of the several states, shall be bound by oath or affirmation, to support this Constitution; but no religious test shall ever be required as a qualification to any office or public trust under the United States.

Richard Cohen, M.A., is an ex-gay who is now married with 3 children. He struggled for much of his life with unwanted same-sex attraction. Richard is the founder of the International Healing Foundation (IHF) and the author of *Coming Out Straight*, *Gay Children Straight Parents*, *Let's Talk About Sex*, and *Alfie's Home*. Richard's journey is found at www.comingoutloved.com/Richard-Cohens-Story. Following are excerpts from his story, which proves that homosexuality is not a matter of immutability but is a matter of religion:

“From middle school, I began to experience same-sex attractions. . . . My same-sex desires got stronger with each passing year. I had more sexual experiences with school friends. For them it was a novelty, but for me it was a growing obsession. At the same time, I tried to act “normal,” so I had girlfriends. But this growing obsession for a man continued to haunt me. . . . In my first year of college, I had several boyfriends, each lasting several months. After one visit home, my father wrote a letter that hurt me deeply. At the same time, I felt suffocated by my current boyfriend, Mike. Besides all that, my schoolwork was overwhelming. I decided to take a bottle of Bufferin and end it all. However, I woke up in the middle of the morning sick as a dog, and still alive. I called my sister, who lived nearby. She came over and took me to the emergency room at the hospital where they pumped my stomach and stabilized my condition. I recovered, continued therapy, went back to school, ended my relationship with Mike, changed my major to theater, and felt a bit more hopeful. In my second year of school, I met Tim, an art major. We would become lovers for the next three years. Since I loved Tim, I wanted to see why he loved Jesus so much. For the first time in my life, I began reading the New Testament. As part of my Jewish upbringing, I was both bar-mitzvahed and confirmed, studying only the Old Testament.

I had always been on a spiritual quest, trying to find the meaning and purpose of life. I tried so many kinds of faiths and ways: Judaism, Buddhism, and therapies. Then I met Jesus. He was a remarkable individual. In fact, he was the kind of man I had always wanted to be myself. What I admired in him was that his thoughts, feelings, words, and deeds were one. He was a congruent man, the same inside as he was on the outside. He spoke of forgiveness and God's grace. These were new concepts for me. I wanted to be like him. This began my journey as a Christian. . . . More and more, Tim and I knew that homosexuality was not compatible with God's Word, so we eliminated the physical part of our relationship.

In 1982, Jae Sook and I married The first few months were wonderful. I told her about what I thought was my homosexual past. Then the problem resurfaced. I felt so much rage toward my wife. I projected onto Jae Sook all the pent-up hostility I had previously felt toward my mother. . . . At home, Dr. Jekyll turned into Mr. Hyde, a rageaholic. I had become what I vowed I would never be—just like my father. My wife soon became pregnant with our first child. I knew I must begin therapy again. So, in May 1983, while living in New York City, I went to see a noted psychologist. For one year, I attended weekly individual and group sessions. . . . Slowly, my heart began to heal as I grieved the effects of the sexual abuse [from my youth] However, there was still a deep wound in the pit of my soul. We had had a

second child during all this. Jessica was a beautiful girl....I found a . . . friend who was willing to help me heal the homo- emotional wounds of my past. He himself was quite stable and comfortable in his masculinity. . . .In that instant, the connection between my childhood abuser and I was cut, and I became free for the first time in my life. With that sense of freedom, I sobbed for about an hour in [my friend] David's arms. It was such a release and relief to know that I wasn't responsible for what had happened and that God had forgiven me. In those moments of release, I found my freedom from same- sex desires. Cutting this neurological connection to the sexual desires freed me from thirty years of relentless pain and an endless pursuit of men.

At the same time, I began graduate school to obtain my master's degree in counseling psychology. After graduation . . . I founded the International Healing Foundation. My vision was to establish healing centers throughout the world to help men, women, and children to experience their value as children of God. This is still my vision, as we continue our journey. I began to give public presentations on the process of transitioning from homosexuality to heterosexuality. I thought that, because of my heart toward the homosexual community, they would see that I was not their enemy, but just presenting another possibility for those who desire to change. I was naive. We received death threats at our home and at my office! We received obscene telephone calls at home with angry, venomous words of threat and accusation. The Gay and Lesbian Task Force of the mayor's office in Seattle requested that the American Red Cross fire me from my position as an HIV/AIDS educator. Many in the homosexual community have felt threatened by my work. I understand their fears and their pain. Over the past 21 years, I have traveled extensively throughout the States, giving presentations about the healing of homosexuality on college and university campuses, in churches, in mental health institutions, at therapeutic conferences, and on TV and the radio. Another blessing occurred 15 years ago. God gave us a precious son, Alfie. He came on the foundation of our (God's) battles and victories. Now, Jae Sook and I and our three children are growing more deeply in love.

I love God with all my heart, mind, and soul. I live to end His suffering and pain. I pray the understanding of same- sex attractions and the treatment plan for recovery that I am about to share is a blessing to you and those whose lives you will touch. I have learned over the past twelve years of counseling hundreds of men, women, and adolescents, and working with thousands of people in healing seminars around the world, that no matter what issue or issues we are facing in our lives, our wounds all originate from the same sources. . . ."²⁴

The take-away from this testimony is that shoehorning gay marriage policy and sexual orientation policies, like Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III), into Equal Protection and Substantive Due Process narratives in order to justify the codification of religious ideology that is questionably real, questionably moral, and questionably legal is flagrantly dishonest. The Defendants must be required to pay Plaintiff

²⁴ www.comingoutloved.com/Richard-Cohens-Story.

Phillips to make him whole again.(Furthermore, the Court must impose punitive damages to tell all of the Blue states to end its entanglement with the LGBTQ church before our nation fractures any further. With Justice Kennedy stepping down, the blood is in the water and this charade through a series of legislative actions is going to end. The correct Constitutional narrative is that the government cannot legally recognize parody marriages or enforce statutes like Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) because the Establishment Clause does not allow it. Although individuals are permitted to self-identify as anything they would like and have wedding ceremonies that accord with their beliefs about sex, faith, and morality, by endorsing LGBTQ orthodoxy, the government has marginalized ex-gays, like Mr. Cohen, placed them in danger, and even relegated them to second class citizens, by implying that their conversations were not real.

C. Melissa A. Ingraham’s Story

Melissa A. Ingraham, who formerly identified as a “lesbian,” resides with her husband Garry Ingraham, who is ex-gay, and two sons in Maine, New York. Melissa’s identical twin sister never struggled with same-sex attraction. Melissa has a Master’s degree in Counseling and was licensed as a professional counselor in New York in 2010. Melissa’s story can be viewed at <https://vimeo.com/84169427>. Following are excerpts from her story, which proves that it is an act of intellectual dishonesty and Constitutional malpractice for any of the branches to pretend that sexual orientation is not a religious ideology:

I grew up in a church-going family with an older brother and an identical twin sister. My father’s business kept him on the road a lot, and by the time I reached high school, he was no longer coming home regularly. My parents hadn’t agreed to separate, and as far as I knew, my mother never confronted him about leaving.I held a lot of anger inside towards my father. I also saw my mother as weak, passive, and a victim for not standing up for herself in the marriage. I vowed never to be like her— emotionally and financially dependent on a man. That vow profoundly impacted my relationships and my view of myself as a woman. In the moment I made that vow, I

put a wall between my mother and myself, rejecting everything feminine, both the good and the bad. I believed that it was not safe or advisable to be a woman. This belief was further confirmed through my violent encounters with my brother when we would be home after school. We both had terrible tempers, and fought horribly. I always wound up on the losing end, feeling beat up and unprotected because my parents weren't there. Beginning in high school and continuing through college, I was involved in several long-term, emotionally-dependent, sexual relationships with men. Reflecting on those relationships, I can see that I was searching for the affirmation, acceptance and worth that I had never received from my father. He wasn't around to bless me as a woman, and say, "You are okay, you are beautiful, you are acceptable." Although I claimed to be the one in control, on the inside I desperately needed to be with someone to have an identity. I became engaged in my sophomore year of college, but I wasn't happy. Through conversations and other circumstances, I began to question my sexuality. I broke off the engagement, and after a year of confusion and searching, I entered a lesbian relationship. It lasted only a short time, but it was emotionally intense. I was devastated when it ended. I was torn. I knew that my lesbian relationship was "wrong", and yet I felt that I had finally found what I was looking for—to be loved and cared for, and to be understood, affirmed, and accepted. The deficit of feminine love caused by my rejection of my mother cried out to be filled in the arms of a woman. Interestingly, right before I left for Christmas break, I confided to a campus minister that I was struggling with lesbianism. He told me it was okay to be gay and Christian. There it was. I could have the best of both worlds. And yet, there was no peace in that answer.

Over Christmas, my sister invited me to attend a Christian conference. I agreed to go, and attended a workshop on sexual wholeness . . . I gave my life to Christ and repented of my lesbian relationship that day. The veil was lifted from my eyes, and I saw how I had been deceived into thinking that lesbianism was God's best for me because it felt so right. When I joined the Living Waters program offered by Regeneration in 1999, I found a place where I could be real about my sexual struggles and my brokenness. I began to understand the impact of the messages I had received from my family about men, women, and marriage. I also gained a great deal of insight into why I related to people in such broken ways and out of such great need. I learned how to forgive my parents and others, which allowed me to receive love from them in a deeper way. I also learned to confess my sins against God, my family, and others, and to receive forgiveness. Some of the sins I confessed were perfectionism, a need to be in control, relational idolatry, hatred of men, hatred of women, and self-hatred. I received truth about my identity in Christ—that I am a beloved, precious, beautiful, and cherished daughter of the King! My small group leaders and the leadership team affirmed my femininity and the goodness of being a woman. I could now enter into godly relationships with men and women, free to be who God created me to be.

I experienced unparalleled freedom, and God began to birth a desire in me to help others in the healing process. . . . [I] pursue[d] a Masters Degree in Counseling. I graduated in August of 2006 and was licensed as a professional counselor in New York in 2010. . . . I have wonderful, healthy friendships, and I am closer to my family. In the fall of 2004, I met my husband Garry. We were married in 2007, and now have two sons. It is difficult for me to describe the miracle of our marriage and how it really is an outward reflection of an internal reality. For me, being with Garry is about so much more than not being with a woman. God truly has restored my femininity

and sexuality. God has shown me the fullness of a heterosexual relationship where both people are submitted to His will.²⁵

The implication of this testimony is that the Establishment Clause is the ultimate DOMA sec 3. It is the primary legal basis that must force the Defendants to stop enforcing Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) against anyone. Period - full stop. The Establishment Clause is the National marriage ban and the national ban on the governments endorsement of any self-asserted sex-based identity narrative that is questionably real, moral, and decent. The States had a duty to, at the very most, define marriage between a man and a woman under the Establishment Clause. The States had a compelling compelling interest to limit marriage to a man and a woman because all forms of parody marriage erode community standards of decency. Homosexuality has absolutely nothing to do with immutability, and no amount of self-serving intellectual squinting by the Defendants is going to change that. It is not a right or left issue. It is a matter of reality, and facts do not care about the feelings of Secular Humanism who are objectively blinded by their pride and their over conformity to society' message. The fact of the matter is that the Colorado Civil Rights Commission knows that there is no such thing as "gay people." There are only some people who for some period of time self-identify as gay. There are thousands of ex-gays and not a single ex-black person. Homosexuality is an ideology that seeks to seduce our citizens into buying into, as they search for purpose and meaning. It is a faith-based worldview that is more or less a trap for the unwary that dehumanizes and exploits its victims in a manner that is out of touch with the self-evident human design. This was why it was illegal until recently. There are millions of Americans who do not want their taxpayer dollars going towards the government's

²⁵ <https://vimeo.com/84169427>

entanglement with the religion of Secular Humanism, which sodomic marriage perpetuates in a manner that is completely unconstitutional from every angle. And since gay marriage policies are unconstitutional, Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) most certainly are. While self-identified homosexuals are not second class citizens, the testimony from ex-gays is that homosexuality is a second class lifestyle that the government cannot promote without violating the Establishment Clause of the First Amendment of the United States Constitution. The Plaintiff clearly believes that to promote acts of immorality is itself an act of immorality. He believes for good cause as a matter of secular common sense that homosexuality is obscene, immoral, and subversive to human flourishing, which is beyond obvious. The Defendants use of Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) is nothing more than a coercive effort to force convert the Plaintiffs and everyone else to a spiritual take on reality that is completely asinine. And where there is a lot free speech, there is a lot of stupid speech, and while people are free to believe what they want - to include Jack Phillips and self-identified transgenders, the fact of the matter is that the State and Federal Government are going to have to completely get out of the parody marriage and LGBTQ endorsement business. The fact that the Colorado Civil Rights commission had the arrogance to target the Plaintiffs after the Supreme Court's decision in *Masterpiece Cakeshop v. the Colorado Civil Rights Commission*, 584 U. S. ____ (2018) conclusively proves that with convincing clarity. The dishonest Colorado Civil rights commission has maliciously hanagued Jack Phillips for six years now on the taxpayer's dime, which in the end has proven to be money well spent, because it has demonstrated for the state and federal legislature that the First Amendment Establishment Clause is going to be enforced in a manner where in a single instance

there will be no more legally recognized gay marriage, government condoned transgender bathroom nonsense, government endorsed pronoun changes, government enforced sexual orientation discrimination statutes. Jack Phillips quiet and patient suffering is going to prove to be the catalyst that caused all 50 states to get out of the parody marriage business and to abandon the enforcement of non-secular statutes like Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) that have the effect of establishment Secular Humanism as the supreme national religion. The United States Supreme Court, with Justice Kennedy stepping down in the wake of *Masterpiece Cakeshop v. the Colorado Civil Rights Commission*, 584 U. S. ____ (2018) is going to back the federal and state legislatures on that. This Court should get out ahead of that to save face for the judiciary and literally strike down Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III), as the Establishment Clause requires.

C. Kristin J. Tremba's Story

Kristin J. Tremba, M.Div., is a former lesbian who is now married with a child. Kristin holds a Master of Arts degree from Columbia University, as well as a Master of Divinity degree from Gordon- Conwell Theological Seminary. She serves as director of Exchange Ministries and is the author of *Sexual Wholeness in a Broken World*. Her journey is found at http://pfox.org/Grove_City_College.pdf. Following are excerpts from her story which prove beyond any doubt that the Supreme Court in *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015) was outright lying when it found that parody marriages are a matter of civil rights and not a matter that is government under the exclusive jurisdiction over the Establishment Clause:

While my sister was attending [college], I was going to a small liberal arts college in Indiana. My freshman year I had high hopes to have fun at school, make lots of friends find my “calling” in life, and then get married. Instead, I found something unexpected and frightening happening: I

was falling in love with my freshman roommate. The feelings I felt for her were the feelings I had hoped to have felt for the guys I had dated in high school. I was overwhelmed and confused and had nowhere to go. . . . My roommate and I lived together all throughout college and one year after college, but we never talked about our feelings for one another or engaged in any physical sexual relationship. Regardless, we were a couple. We were emotionally dependent upon each other (we viewed other people as a threat to our relationship, preferred to spend time alone and were frustrated when this didn't happen, became angry or depressed when the other withdrew slightly, lost interest in other friendships, and experienced romantic and sexual feelings for the other) After college, I entered the Peace Corps, which required me to leave my roommate. This was not easy for either of us. However, on my flight to Albania, I prayed that God would bring a man into my life. Thus began my search for love and the hopes to marry again. I was 23 years old. In Albania, I found myself having sexual feelings for both men and a particular woman as I served as a volunteer. I lost my virginity and became more promiscuous with men.

It was not soon after this that I fell into a sexual relationship with a woman who was openly gay, and who pursued me. In my loneliness and neediness for intimacy, I gave in to her and found being with her to meet a deep emotional need inside of me. This relationship continued until I moved to a different state for work. When I heard that she would be coming to live with me, I was euphoric and ready to come "out" of the closet, so to speak. I began telling friends, and I even attended a gay-friendly church, but it all seemed so foreign and unsatisfying. [Ultimately,] God taught me that sexual sin was my attempt to meet legitimate emotional needs in sexually illegitimate ways. He showed me that there were some emotional needs that had not been met in my family relationships growing up, there were some wounds, and so I was attempting to meet these needs and cover these wounds in sexual relationships as an adult. He taught me that there were also things I was born with: a sin nature, a particular temperament, various weaknesses, and a negative body image and negative view of my femininity. He taught me that even though I did not choose all my circumstances and struggles, I could choose to overcome them. I could choose to let God change my life. People ask me, "Do you still struggle with same-sex attraction?" My answer is no, I don't, but I still struggle with worry and doubt and lots of other things²⁶

The inescapable take-away from the testimony is that the Supreme Court in *Obergefell* was dead wrong in pretending that sexual orientation is a matter that had anything to do with the Fourteenth Amendment. Instead, the evidence clearly shows that the Establishment Clause has exclusive jurisdiction over marriage matters and completely prevents all 50 states from legally recognizing any form of parody marriage as a matter of Constitutional preemption. Three branches of government must now turn back, admit that the Supreme Court in *Obergefell* and

²⁶(http://pfox.org/Grove_City_College.pdf.)

Windsor were lying, and in a single instance, do away with gay marriage policy, conversion therapy bans, sexual orientation discrimination statutes, and transgender bathroom policies.

When the Federal Congress passes the Marriage And Constitution Restoration Act it is curtains for Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III). So, the Colorado District Judges who were assigned to this case would be wise to see the long game.

The Establishment Clause was around before gay marriage and statutes like Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III). Gay marriage policy and Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) have always been unconstitutional. It is obvious from the reasonable person perspective, and any attempts by the intellectually dishonest Defendants to project their bigotry onto Jack Phillips by calling him one is just another indictment on their credibility.

IV. The ex-gay community is subject to more animus, intolerance, and discrimination than any other minority group

The dramatic ascendancy of GLBT political power and legal victories in recent years have been tragically accompanied by the diminution of rights of conscience and religious freedom.²⁷ Indeed, the rising tide of “sexual-liberty” has not lifted all boats. No other minority group has endured the brunt of growing intolerance, moral-cultural approbation, and derision more during this time of cultural upheaval than have former homosexuals. The testimony of ex-gays makes them a threat to members of the LGBTQ church who are bent on using government to ratify their private moral beliefs at all costs.

²⁷ Religious individuals and groups whose sacred texts define sexual relationships and marriage traditionally have been the target of increasing animosity, intolerance, and judicial and social defamation. They have been unfairly branded with terms such as “bigot,” “homophobe,” and as exhibiting hatred or “animus.”

Sadly and ironically, the primary instigators of ex-gay animus have been the very same gay rights groups and individuals who were themselves recently demanding social “tolerance” and “respect” for same-sex lifestyles and marriage. As the U.S. Court of Appeals for the Sixth Circuit observed, “[t]olerance,” like respect and dignity, is best traveled on a “two-way street.” *DeBoer*, 772 F.3d 388 at 410 (6th Cir. 2014), quoting *Ward v. Polite*, 667 F.3d 727, 735 (6th Cir. 2012). Yet, because ex-gays are a living rebuke of the inconvenient truth that that same-sex attraction is not immutable for Equal Protection purposes, former homosexuals have increasingly been subjected to very “unfriendly fire” from many self-identified homosexuals, who have sought to delegitimize them out of existence in accordance with their dangerous beliefs that there is no such thing as absolute truth. The *Windsor* majority stated that in “determining whether a law is motivated by an improper animus or purpose, ‘discriminations of an unusual character’ require careful consideration.” *U.S. v. Windsor*, 133 S. Ct. 2675, 2692 (2013) (quoting *Romer v. Evans*, 517 U.S. 620, 633 (1996)). But unlike *Romer*, the state laws marriage to one man and one woman were neither unusual nor do they fail to be rationally related to States’ legitimate public interest in regulating male-female relationships and their unique procreative possibilities and their propensities to uphold community standards of decency. In *Romer* however, because the State had no valid reason for exempting only gays from anti-discrimination protections. The Secular Humanists on the bench pretended that the law was found to be “born of animosity toward” gays and suggested a design to make gays “unequal to everyone else.” *Romer*, 517 U.S. at 634–35. And unlike *Windsor*, here in this revived controversy, there is no federal deprivation of a marriage status granted through a State’s authority over domestic relations, and thus, there is

no basis for the government inferring that the purpose of the state law is to “impose a disadvantage”/“a separate status”/“a stigma” on gay couples. *Windsor* 133 S. Ct. at 2692- 95.²⁸

Amicus asserts that heightened scrutiny should be applied under the Equal Protection clause to laws involving sexual orientation, nor that state laws limiting marriage to one-man and one-woman are not rationally related to legitimate purposes. *Amicus* believes based on having been heavily involved with the LGBTQ church that sexual orientation policies are a religious sham that are inseparably linked to the religion of Secular Humanism. The *Amicus* is testifying from its direct experience, which is something that the Defendants cannot do or refute. The government’s arbitrary endorsement of sodomic marriage is a religious and political power play that serves to undermine the Supremacy of the United States Constitution itself because it is an assault on the absolute truth that serves as the master narrative of of the Constitution itself. It is a piece of cake to see for those who are not brainwashed by shallow cultural narratives.

The Center for Garden State Families brings to this honorable governmental body’s attention the fact that ex-gays have themselves suffered significant discriminatory “animus” and endured “disadvantage,” “separate status,” and “stigma,” at the hands of self-identified gays. This is because the testimony of ex-gays is fatal to the fiction that sexual orientation is a matter of civil rights and not a matter of religion. Hundreds of ex-gays live in a persistent state of worry and danger by highly radicalized Secular Humanists, who do not believe in morality to begin with and who will do anything to keep the charade going. Although there is extensive evidence confirming sexual orientation’s fluid and transient nature, the widely embraced theory by secular

²⁸ The reasoning in cases like *Windsor*, *Romer*, and *Obergefell* is so intellectually dishonest that the decisions themselves are conclusive proof that legally recognized gay marriage is a non-secular sham that violates prong one of lemon.

humanist that same-sex attraction must be a fixed and “immutable” “accident of birth,” contributes greatly to animus against ex-gays and other non-observers to the religion of Secular Humanism to include mainly Christians who vote republican. This is because the very existence of former homosexuals undermines this popular yet false, out of date, and shallow cultural narrative regarding the purportedly fixed origins of same-sex attraction. *Amicus* posits that the gay “immutability” myth was developed and fostered as a bold but clumsy attempt to analogize the LGBTQ movement with the African American struggle for civil rights and equal protection in order to appropriate its cultural moral authority. The Democratic party is - once again - exploiting blacks to gain political power with a voting block with complete indifference to the fact that their misappropriation of the race-based civil rights movement threatens the integrity of it. This is why so many people of color are walking away. The dangerous Colorado Civil Rights Commission is not protecting the race-based civil rights movement, it is undermining it. The Plaintiffs are the ones who are on the side of Pastor Martin Luther King Jr and who are not only defending the integrity of the race-based civil rights movement, they are upholding Constitutional supremacy and community standards of decency.

Former homosexuals are perhaps the last invisible minority group in America today.²⁹ Ex-gays are reviled, ridiculed, and marginalized simply because they do exist and do pose a threat to the LGBTQ’s efforts to misuse the government by enshrining their cult-like worldview that defies common sense and decency.³⁰ Consequently, many ex-gays and their supporters are forced to remain closeted, on the fringes of American culture, because of fear of societal

²⁹(http://www.nytimes.com/2011/06/19/magazine/my-ex-gay-friend.html?pagewanted=all&_r=0)

³⁰(<http://www.christianpost.com/news/former-gay-activist-marries-woman-addresses-critics-who-condemn-his-new-heterosexual-lifestyle-110736>)

disapproval, stigma, and violent oppression. See ANTIFA; see Judge Martinez, in *Sevier et al v. Hickenlooper et al*, 1:17-cv-01750 (COD 2017), who took matters into his own hands and tried to create precedent that if anyone dares call the governments entanglement with the LGBTQ church unconstitutional, they can be fined more than \$20,000. It is true that individuals have experienced homosexuality differently and theories of the “causes” of same-sex attraction vary greatly. If one’s sense of personal well-being is dependent on all other people who have experienced same-sex attractions having had an identical “gay experience,” then that person is in a precarious position, because actual experiences vary significantly. The fact of the matter is that the Establishment Clause prohibits the government from endorsing or promoting LGBTQ ideology, no matter how sincere self-identified homosexuals are in their belief that they were “born that way.” It is a long standing jurisprudence that neither emotional appeals or sincerely of belief will allow the government to usurp the Establishment Clause. *Holloman v. Harland*, 370 F.3 1252, 1286 (11th Cir. 2004).

Although gay organizations advocate for the “sexual liberty” rights of homosexuals, lesbians, bisexuals, transgenders, transsexuals, and the intersexed, they do not add ‘ex-gay’ to their list of the aggrieved and nearly uniformly oppose ex-gay rights because they have been advocating a religious sham.³¹ Yet the inclusion of ex-gays ensures tolerance for all segments of our society. Acknowledging the ex-gay community exists and is worthy of respect and dignity does not mean that individuals have the right under the Free Exercise Clause to self-identify as

³¹ Amicus is not aware of a single gay rights organization in the United States which supports the equal rights of the ex-gay community. Like all peoples, former homosexuals want to be open and safe at work, in their community, and in the public square.

homosexual. They do. But that does not mean that Colorado can enforce Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III).

Due to its political powerlessness and a near singular focus on LGBT rights, the ex-gay community finds that Americans are not generally unaware of the widespread intolerance practiced against those who leave homosexuality. Here are some poignant examples: (1) Transgender individuals are affirmed for changing their gender, but ex-gays are ridiculed for changing their sexual orientation. (2) African American ex-gay Grammy winner Donnie McClurkin was removed from singing at a Martin Luther King memorial concert following complaints by gay leaders.³² Self-identified Gay leaders also criticized then-presidential candidate Barack Obama for allowing Donnie McClurkin to sing at a fundraiser and insisted that he drop the singer from the program.³³ (3) The World Bank removed *Amicus*, a non-profit corporation, from its charitable fundraising program after receiving complaints from the Human Rights Campaign, a pro-gay activist organization.³⁴ (4) In response to complaints from gay organizations, Washington D.C. Mayor Adrian Fenty apologized for issuing a certificate of appreciation to an ex-gay organization. Yet in signing gay marriage legislation for the nation's capital, the mayor had promised equality for all D.C. residents.³⁵ (5) Ex-gays and their supporters are routinely denied inclusion in all realms of society and access to public venues. Following complaints from local LGBT groups, an ex-gay billboard endorsing change and tolerance for all was taken down after three days in Tucson; the Montgomery County Maryland public school

³²(<http://www.christianpost.com/news/ex-gay-community-baptist-leadership-say-dc-officials-are-infringing-on-pastors-civil-rights-102212>).

³³ (<http://www.youtube.com/watch?v=A3jkeTdgLrg>).

³⁴(<http://www.hrc.org/press-releases/entry/hrc-to-world-bank-remove-pfox-from-your-community-connections-campaign>).

³⁵(http://voices.washingtonpost.com/dc/2010/04/fenty_apologizes_for_honoring.html).

system amended its community flyer distribution program to prevent an ex-gay organization from participating; ex-gay conferences and events are frequently picketed; and a metropolitan transit authority cancelled its free public service advertising to prevent ex-gay organizations from participating. (6) Gay rights groups are now wielding their considerable political power to aggressively oppose and outlaw much needed counseling and therapy for men, women, and youth who struggle with unwanted same-sex attraction. These activities are carried on by organizations like The National Center for Lesbian Rights,³⁶ Southern Poverty Law Center,³⁷ and Human Rights Campaign.³⁸

These intolerant and discriminatory actions by LGBTQ activists “impose[s] a disadvantage, a separate status, as so a stigma” on gays who want to overcome unwanted same-sex attractions and former homosexuals who have successfully done so, “demean[ing]” and “humiliate[ing]” ex-gays. *Windsor*, 133 S. Ct. at 2693-94. Every day brings new hostile acts against former homosexuals, a politically unpopular group. This irrational prejudice against those who have overcome unwanted same-sex attractions perpetuates misunderstanding and harm against the ex-gay community. It also demonstrates a disregard for diversity and a refusal to respect basic human rights of dignity and self-determination. Unfortunately, recent judicial victories in same-sex “marriage” cases have empowered and emboldened words and acts of animus by loosely equating the legalization of same- sex marriage with proof of gay “immutability,” providing further justification for the unfounded viewpoint that ex-gays “do not exist” and, therefore, should be ignored or banished from society and not allowed to participate

³⁶ (<http://www.nclrights.org/explore-the-issues/bornperfect/>)

³⁷ (<http://www.splcenter.org/conversion-therapy>)

³⁸ (<http://pfox-exgays.blogspot.com/2012/05/wacky-wayne-besen.html>).

in the marketplace of ideas and commerce.³⁹ The negative stereotyping by gay activists of ex-gays is a sad end to the long struggle for tolerance by the gay community; the oppressed have become the oppressors, and no one knows that better than the Plaintiffs. That ex-gays and their supporters are now the targets of the same people who, until recently, were victimized themselves, demonstrates the tremendous political power and social acceptance of self-identified gays and lesbians right to self-identify as they would chose, as the Free Exercise Clause permits. Yet, in spite of the significant and real animus ex-gays suffer, *Amicus* does not concur that unfounded claims of hatred or animus should be used as an excuse to redefine the important institution of marriage and to fashion swords to impale Christians like Jack Phillips for having the humility to bank his entire life on the radically transformative personalized truth of Jesus Christ, being exactly who he said he was - the one redeemer that the world desperately needs. Indeed, the Sixth Circuit, exhibiting appropriate judicial humility and restraint, recognized its inability to attribute animus to millions of voters: "If assessing the motives of multimember legislatures is difficult, assessing the motives of all voters in a statewide initiative strains judicial competence." *DeBoer*, 772 F.3d at 409. Thus, all three branches of government must not be quick to disparage, demean, and disrespect, with that monstrous moniker "animus," the good citizens of states whom have determined, for any number of legitimate reasons by participating in the democratic process, that marriage should remain defined as it always has been because marriage policies between one man and one woman are secular and actually accomplish the purpose for which they were made. Pro-LGBTQ policies, like Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III), are completely non-secular

³⁹ (http://www.huffingtonpost.com/alec-fischer/this-is-what-happened-whe_1_b_6068712.html)

shams because they accomplish the very opposite of their intended purpose to generate tolerance, equality, and unity. To assume that prejudice or hatred is the primary driving force in maintaining marriages' traditional form, unnecessarily defames millions of taxpayers in the United States who do not want their dollars going towards entangling the government with the religion of Secular Humanism because those policies erode the fundamental right to believe in a different religious worldview, which classifies homosexual conduct and ideology as an evil that the Establishment Clause will not allow the government to respect.

CONCLUSION

All prior cases that pretend that sexual orientation is a matter of civil rights and not of religious mythology must be overruled by in light of the overwhelming evidence that all self-asserted sex-based identity narratives that are questionably real, questionably moral, and questionably legal are implicitly religious for being predicated on a series of unproven faith based assumptions and naked truth claims that are inseparably linked to the religion of Secular Humanism. The testimony of ex-gays - alone - causes the legal justifications supporting the fake gay civil rights movement to implode completely. The Plaintiffs arguments here combined with the evidence provided by the Amicus, should not just cause Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) to be struck down and the Defendants enjoined from haranguing Jack Phillips, they should cause the government to completely disentangle itself from the LGBTQ church. The Judiciary has one chance to get it right before the legislative branch comes in and creams the Judiciary for having the lack of common sense and character for deliberately misinterpreting the Constitution for reasons that are based on egoism and animus towards Americans who have the common sense to believe in absolute truth.

This action - alone - proves that the government's dishonest and unconstitutional endorsement of the LGBTQ church has not only failed to accomplish its intended purpose, it has lead to the overt persecution and oppression of ex-gays and Christians. Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) are not about tolerance and unity to advance civil rights, they are about censorship of conservative Christians who tend to vote republican. It is glaringly obvious and yet the Defendants have refused to comply with their duty to obey Article VI and uphold the Establishment Clause of the first amendment. It is government misconduct that smells of sedition that could cause some of the Defendants to be criminally prosecuted after the midterm elections by the soon to be transformed DOJ.

This brief establishes that homosexual sexual orientation is not pre-determined and fixed by "the accident of birth," but is in fact subject to alteration and change and that the premise behind Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III) is "removed from reality."⁴⁰ All three branches of government must disentangle themselves from the LGBTQ church. This means no more legally recognized gay marriage, no more sexual orientation discrimination statutes like CADA, no more conversion therapy bans, no more threats towards ex-gays, no more Christian persecution, no more transgender bathroom nonsense, no more changing pronouns, no more changing birth certificates, no more LGBTQ indoctrination in schools, no more transgender indoctrination Library Hour at the public libraries, etc. The government's entanglement with the LGBTQ community has been a total and complete disaster. The State officials in Colorado who are named as Defendants give the appearance that they do not know the objective difference between right and wrong, real and fake, and secular and

⁴⁰<https://www.lifesitenews.com/news/former-jag-officer-highlights-absurdity-of-gay-marriage-by-suing-to-marry-h>

no-secular. The *Amicus* asks the Court not to make the same mistake for the sake of the Judicial branch itself. By disentangling itself with the LGBTQ church, ex-gays and other non-observers of the religion of Secular Humanism, will no longer have to live in fear of persecution by ANTIFA-type-thugs and other Secular Humanist groups, who have become emboldened by the government's reckless and dishonest endorsement embodied by the Defendants immense dereliction of duty and refusal to think logically. The bottomline is that the government should have never opened the door to entangling itself with the LGBTQ church in the first place. We all make mistakes. But we can change. Our nation has the ability to turn back and get it right. This is one of the main points of the *amicus*, who regrets having been seduced by the LGBTQ church. One reason why the *Amicus* is filing this brief is for the same reason why the government must get out of the parody marriage business. The *Amicus* wants young people who have opened the door to the LGBTQ worldview that they too can change and leave it behind. Hope remains. For the government to tell its citizens that if they opened the door to buying into the LGBTQ orthodoxy, they cannot leave it behind, is a position that amounts to government coercion and sexual exploitation. Self-identified gay people can leave behind the LGBTQ worldview, just as the *Amicus* has. The self-identified transgenders who compelled the Colorado Civil Rights Commission to harangue the Plaintiffs have the potential to leave their identity narrative behind and find one that is not rife with intellectual darkness. They also have the right to continue to embrace their current identity narrative. But that does not mean that State actors in Colorado can create or enforce policies like Colo. Rev. Stat. § 24-34-601(2)(a) and Colo. Rev. Stat. § 24-34-303(1)(b)(I)-(III).

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document and attached exhibits were mailed with adequate postage to the Defendants and Plaintiffs in this actions on August 27, 2018 to James A. Campbell ALLIANCE DEFENDING FREEDOM 15100 N. 90th Street Scottsdale, AZ 85260; JESSICA POCOCK, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; ANTHONY ARAGON, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; AUBREY ELENIS, Director Colorado; Civil Rights Commission 1560 Broadway Denver, CO 80202; MIGUEL "MICHAEL" RENE ELIAS, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; CAROL FABRIZIO, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; CHARLES GARCIA, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; RITA LEWIS, Member Colorado Civil Rights Commission 1560 Broadway Denver, CO 80202; CYNTHIA H. COFFMAN Colorado Attorney General Office of the Attorney General Ralph L. Carr Judicial

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/s/Anna C. Little, Esq./

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Masterpiece Cakeshop

1:18-cv-02074-WYD-STV

v.

Elenis

DECLARATION OF THE PAST PRESIDENT OF PARENTS AND FRIENDS OF EX-GAYS AND GAYS (PFOX) GREGORY QUINLAN

I, Gregory Quinlan, declare under the penalty of perjury, pursuant to 28 USC sec. 1746 as follows:

1. I am over 18 and a resident of New Jersey.
2. Here are a few of many links to me speaking in videos. The statements that I make in this videos are true and accurate that I now incorporate into this sworn testimonial:
 - a. Gregory Quinlan - Interview with News Plus Part 1.

Gregory Quinlan is the president of PFOX--Parents and Friends of Ex-Gays & Gays (PFOX). It's a national non-profit organization that supports families, advocates for the ex-gay community, and educates. Quinlan argues that ex-gays should be considered a 'protected' class against hate crimes. He also says that persons who are gay can be rehabilitated to become straight--which is derived in large part from his own experience in doing just that.

<https://www.youtube.com/watch?v=gDDAbCS25KY>

- b. Gregory Quinlan - Interview with News Plus part 2.

<https://www.youtube.com/watch?v=nUcLia8Ws8Y>

- c. The LGBTQ (QIAAP) Agenda: Ground Zero in the Culture War.

The LGBTQ (QIAAP) Agenda - audio recording from Breakout Session of The Awakening 2013. Discussion is moderated by Rena Lindevaldsen, and features Matt Barber, Cynthia Dunbar, and Gregory Quinlan. For more information about related events and topics please visit www.lc.org.

<https://www.youtube.com/watch?v=aITfwAT819c>

a. Gregory Quinlan - Biography on PFOX

<https://www.youtube.com/watch?v=Qof0l0WXtog>

b. The Wisdom of God:

<https://www.youtube.com/watch?v=ek5BI2vYP0A>

c. Pastor Charlene Cothran - Testimony before the Civil Justice Subcommittee

<https://www.youtube.com/watch?v=s-FhIKbCDJg>

d. Ex Lesbian Charlene Cothran Tells her Testimony:

https://www.youtube.com/watch?v=p_wXcCCfE2U&list=PLB0192509974B4210

e. African-American Pastors Decry Gov. Deal's Betrayal on Religious Liberty

<http://www1.cbn.com/cbnnews/us/2016/april/african-american-pastors-decry-gov-deals-betrayal-on-religious-liberty%20?cpid=:ID:-9283-:DT:-2016-04-01-16:32:42-:US:-JG1-:CN:-CP1-:PO:-GC1-:ME:-SU1-:SO:-FB1-:SP:-NW1-:PF:-%20VI1->

INTRODUCTION

3. I incorporate my bio here.¹ I was born in 1958. I am married to a woman of the opposite-sex.

4. I am a registered nurse. As a gay identified man, I helped care for AIDS patients when the AIDS epidemic hit the gay community hard in the mid-1980s. At the age of 30, I joined the Human Rights Campaign Fund as it was identified then, the largest gay and lesbian political organization in the United States, forming a branch in his home town of Dayton, Ohio. Since leaving the homosexual life I have shared my testimony on radio programs and Christian television. I have been quoted in USA Today, The Wall Street Journal, The New York Times, and World Net Daily. My testimony was published in the February edition of Charisma Magazine.

5. I worked for the New Jersey Family Policy Council to protect the sanctity of marriage and worked with Parents and Friends of Ex-Gays and Gays (PFOX) as a board member and past President. I am an advocate for the ex-gay movement; emphatically arguing that citizens get accurate information about the changeability of sexual orientation so that those with unwanted same-sex attractions know they have an option other than the gay lifestyle. In 2009 at a shareholders meeting of PepsiCo I informed the Board that the gay political organizations they were funding promoted “fear and hostility against the ex-gay community.” In March of 2010 on behalf of PFOX, I addressed the corporate directors of the Walt Disney Company at its annual shareholder’s meeting and asked them to approve a resolution to include ex-gays in Disney’s mandatory diversity training for employees.

¹ My bio that was compiled by Thomas Coy from Parents and Friends of Ex-Gays and Gays (PFOX) procured in March of 2010, an article by Michael J. McManus in Religion and Ethics from May 24, 2006 entitled “Causes & Cures of Homosexuality,” and excerpts from an August 1998 Focus on the Family “Citizen” magazine article entitled “Former Homosexual now a Pro-family Lobbyist” written by Clem Boyd. Charisma Magazine February 2016 “Gay Activist has Road to Damascus Experience.”

BACK GROUND

6. I was the oldest of four children growing up with an abusive father. Although my mother was a born-again Christian, my father was “an atheist with an attitude;” an Archie Bunker type with the added element of violence. I was usually the one my father would choose to abuse. Twice his father’s beatings put him in the hospital. “One day at age 8, in front of his friends, Greg asked his dad, “You hate me, don’t you?” His dad cursed and replied, “Yes, I hate you.,” and laughed. I sighed, “I knew that.””

7. My mother regularly took us children to church and at the age of nine, I “professed my faith in Jesus Christ,” but life at home with his father only got worse. At the age of ten after a group of neighborhood boys began looking at their fathers Playboy’s a thirteen year old boy from across the street began having sex. I recalled that time in my life, “I knew it was wrong, but what I got was affirmation, affection, approval and someone was touching me who was not beating me up.”

8. “At age 23 I made my sexual behavior public, “blowing the doors off the closet,” as I have described it. I had many sexual encounters, visited gay bathhouses all across the state, was a regular patron of porn shops and lived the party life within gay social circles.” I consider myself very fortunate that I remained HIV-negative, after living the promiscuous gay lifestyle. I believe it was God’s providence that I am not infected with the HIV virus.

9. “As a registered nurse, I began taking care of AIDS patients when the crisis hit the Dayton-area in the mid 80s. I took these men to the doctor and cared for them at home. “Then this guy I was dating invited me to a reception in Columbus in 1986 for the Human Rights Campaign Fund (HRCF). ”That’s how I was introduced to gay politics, at age 28.

10. "Two years later, I started an HRCF committee in Dayton. HRCF is the largest gay and lesbian political organization in the country, chiefly responsible for securing AIDS research money from the federal government. I raised thousand dollars out of Dayton and really got involved because of the AIDS epidemic. But in all my work with HRCF I was trying to justify being in the lifestyle, because I was miserable. I was under a doctrine and religious ideology that was void of a living hope.

11. I started watching Christian TV to see what the enemy was doing, the 700 Club, PTL and TBN. At first, I wanted to reach through the set and strangle Pat Robertson. But I saw an ex-gay on the show who shared how he left the lifestyle. "EX GAY?" I asked myself. How is that possible? But I hated my life. There is pleasure in sin for a season, but I wanted out. I watched intently - partly making fun, partly wishing it was true. I thought, "I don't have to be gay?"

12. I watched a panel of former homosexuals on TBN, listened to their stories of pain and sex addiction, some with drug addictions. I decided I wanted out of this lifestyle. It was Thanksgiving weekend, 1992 and he decided to call TBN. When I prayed to God admitting my sin and recommitting my life to Jesus Christ, I had peace.

13. I had been on TV, radio and in newspapers (as a homosexual activist). I was not ashamed of being a homosexual and talking about the AIDS crisis. I'd go to Washington D.C. two to three times a year to lobby Capitol Hill. But I had a lot of trouble telling this total stranger what my problem was. I was suddenly ashamed of being gay. I wasn't happy about it.

14. My decision resulted in a sudden and abrupt turn in my life. I got into church immediately, changed his telephone number, stopped hanging out at gay bars, and discontinued my volunteer

work with the Dayton Area AIDS Task Force. I stopped cold turkey doing anything in the gay lifestyle.

15. I had a lot of reasons to be angry, but when I started on a path of truly forgiving my father, my anger and bitterness left - along with my homosexual desires. As a grassroots lobbyist I went to Capitol Hill for the lunatic left. HRCF trained me how to do it and a year later I was using my training for the other side. The Lord turned it all around.

16. I might be one of the most visible and outspoken ex-gays in America. I started an Ohio ministry, the Pro Family Network, which lobbied for passage of Ohio's one man, one woman Marriage Amendment and I am a past board member and spokesperson for PFOX (Parents and Friends of Ex-Gays and Gays). The goal was not to codify Christian marriage, but to legally define actual marriage in order to keep the homosexuals from using government to legitimize their religious identity narrative at the expense of the truth and the public's health. I talk to teens about the complex issue of homosexuality, giving them insights that academia and the media suppress. I have debated for a person's right to self-determination, spoken to the scientific evidence that homosexuality is not innate and have defended natural marriage in 17 states and the District of Columbia. I worked vigorously with the New Jersey Family Policy Council to protect the sanctity of marriage from 2008 to 2015. I have now founded the Center for Garden State Families 2015.

17. For choosing to defend the interests of individuals with unwanted same-sex attractions, the public's right to know that homosexuality is changeable, the teenager's right to know that the gay lifestyle is often miserable, and for one man one woman marriage, I have has been screamed at and heckled by gay activists who consider my transformation a dangerous threat to their incredible dishonest narrative that seeks to exploit the sympathies of the general public - which is

nothing more than a shallow power play that is inherently sexually exploitative. I have also received death threats, which has been hard for my wife on many levels. It led to our divorce in 2007. But I care very much about the youth, the public health, and the country in general.

Factors of Homosexual Causation:

18. As with the vast majority of male homosexuals, my childhood was full of hurt and rejection. I did not identify with my father as a young child. Every young boy needs same-sex affirmation that he is a male and an adolescent boy needs affirmation that he is becoming a man. I did not get the male affirmation that I needed so when I discovered sex with an older neighborhood boy, it filled that void in an unhealthy way.

19. Most would agree that if a 13 year old boy introduces a 10 year old girl to sex it is molestation. The same standard should apply to a 13 year old boy introducing a 10 year old boy to sex. Growing up as a teen, I was interested in sex with other men only because of that introduction. I've known thousands of homosexuals and I've never met someone who was not introduced to sex at an early age, generally with the same sex. There multiple causative factors for same sex attraction. They are similar and yet different in scope and application between male and female. Current changes in cultural norms are actually encouraging same sex experimentation in minor children. Pornography is readily accessible and free online creating early childhood sexualization. Pornography was a definitive factor in my sexual identity development.

Motivations to Change:

20. I had an active homosexual sex life, but I was miserable as a gay man. I could not deny that I hated my gay life and when I saw a former homosexuals give their testimony on TV it gave me the hope that I could get out of homosexuality.

There was also a religious motive to change. Buried in the subconscious or in religious terms in the depths of my soul, I believed my homosexual behavior was immoral and homosexuality in general was objectively immoral. When I called TBN to pray a prayer of reconciliation with God, I immediately felt peace. I wanted others to have it too.

From a Christian perspective I made a heartfelt profession of faith at age nine. The Scriptures show that while God judges man He is also merciful, compassionate and patient, “not wanting anyone to perish, but everyone to come to repentance” (2 Peter 3:9). God did not give up on me, and when I turned to God, like the Parable of the Lost Son in Luke chapter 15, God ran to meet me.

Process of Change:

21. From my testimony, there is not a lot of information on my process of change. The peace I felt from reconciling to God was real and he built upon it. Intuitively, I knew that my gay friends would mock my new direction in life and hinder my growth as a Christian, because I was convinced that homosexual behavior was immoral and was not based on immutability as we were convincing one another to believe. My gay friends would not be sympathetic to me rejecting my gay identity as their own lives were built upon a gay identity, which is a religious narrative predicated on unproven faith based assumptions that are completely false and as implausible as the truth claims floated by the impeached self-righteous religion of Islam. I wisely “stopped cold turkey doing anything in the gay lifestyle.” I obviously filled that void with

people who were supportive and empathetic with the new direction of my life. Obviously, my father's deathbed conversion where he confirmed that he loved me helped me begin the process of forgiveness and reconciliation of past wounds. The time I spent caring for my dying father probably added to my ability to reconcile. It was through the process of forgiving my father that my bitterness and anger healed. As this healing increased my residual homosexual desires left.

22. One of the main messages that I have is that if people want to get out of the gay lifestyle they can. For ten years, I lived the homosexual lifestyle, and self-identified as a homosexual. As a registered nurse who was living in the gay lifestyle, I watched a 100 of my friends and acquaintance die of aids before I stopped counting. Being faced with questions of mortality, I began questioning where I was going and what I was doing.

23. I began to research and found that there was no scientific evidence that people were born homosexual, and there was no biologic evidence for why I was doing what I was doing in this life style, in accepting this particular sexual identity. I started to think through it and figured out why was I and others living this lifestyle, it just seemed to be a cultural, sociological, and emotionally based. I questioned why do I want to keep this lifestyle going. I was not fulfilled.

24. I did not take a pill. I did not pray away the gay. I just decided that I wanted to drop this ideological belief system and life style. I went through a process of figuring out why I got to where I was. I was sexually molested as a child. I always say that Hugh Hefner was my first molester because it was Playboy magazine that literally aroused me as a 10 year old. That's how I got into the homosexual lifestyle. I lived in that lifestyle for ten years openly. But coming out of that lifestyle was not a switch that I just turned off. I had to explore why did I feel the way that I did. I did not seek reparative therapy. I had very little counseling. A lot of my decision to leave the gay religion was a journey that I took on my own.

25. A lot of ex gays leave the lifestyle for religious reasons and a lot leave it for all kinds of different reasons, but it is literally like converting from one religion to the next. A lot of what I do now is to declare an individual's fundamental right to self-determination.

26. I believe that doctors, therapists, physicians, counselors, and persons in the healing arts absolutely must have the right to help counsel individuals out of the gay lifestyle, if they want to leave it behind. I believe that physicians have the obligation to help such individuals leave behind the lifestyle and the ideology that propels it.

27. Even one homosexual who turns straight proves that homosexuality is not innate. I am proof of that and I've seen thousands of others leave the lifestyle and denounce it. Homosexuality is a choice, but I did not choose my feelings. But I did act on my feelings. That is, I did choose how I responded to those feelings. I did not have all of the information when I responded to those feelings. And that is problem. Today in public schools we are not giving students a choice. Teachers are telling them to "be gay" to try it "you'll like it." It is a dangerous experiment. Minors who buy into that ideology and not just taking on an identity, they are exploring the acts of sex. Teachers and society try to pass it off as safe sex, but there is no such thing. It should be called suicidal sex. I know that because I buried a lot of people who were homosexual who practiced safe or safer sex.

28. I was successful in suing the District of Columbia in having ex gays be protected as a recognized minority group of people. There is a huge amount of resistance towards ex gays because if you can show that you can change from gay to straight, it creates a problem for others who identity as LGBT, who want to believe the gay ideology. There are those who want to believe that Islam is a religion of peace, and yet, the jihadist tend to cause a problem for those types. Since I and other ex-gays are saying openly that people can change and leave the

homosexual lifestyle, it single handedly destroys the entire gay rights and transgender narratives, which are indeed based on fraud, the denial of truth, and sexual exploitation.

29. The American Psychological Association and the Psychiatric Association both say that sexuality is fluid. People make decisions on their sexuality based on their feelings and life circumstances, and not immutable traits. I made a decision after homosexuality did not work for me, after the decade that I openly practiced it. For over two decades now, I've been out of that lifestyle, and I've been much happier. I've been practicing a heterosexual lifestyle.

30. There are tons of pro-LGBT groups that will go after you personally, if you say that you can change. Of course, since these groups do not believe that truth exists in the first place, they have zero accountability over their hearts. I find the gay activist groups to be an extreme hate group that is truth phobic. I am a proponent of allowing people to make an informed choice, when it comes to a sexual lifestyle. I want people to know that they do not have to live the gay lifestyle, if they do not want to and that it is better to keep the door on that narrative altogether.

31. I have a scar on my nose because I was punched in the face after handing out pamphlets saying that I am an ex gay. That is the kind of hatred and bigotry that I get from breaking rank with the phony narrative that people are born gay. I did choose that homosexual identity, and I want people to know that they do not have to stay gay if they do not want to.

32. I try to give people hope. People who are in the homosexual lifestyle do not have to stay in it, and it is ok for them to leave it behind completely and start anew. I see these kinds of people all the time. A lot of them do not go public about it because they get pressed and shamed by their peers. Many people who lead the gay lifestyle, and who have decided to leave it are now married and they do want to expose their children to past. I just really feel called to let others know that

they do not have to stay where they are if they do not want to. So I started several ex-gay support groups and became involved with PFOX -Parents and Friends of Ex-Gays & Gays.

33. Many in the media ignore the reality of ex gays because they have based their entire life around the idea that truth is relative. It is their religion, and our existence shows that their religion is fake, shallow, silly, and removed from reality. When the media does cover ex gays, it is incredibly negative. They make fun of us, falsely say that we were not gay to start with, and that there is something wrong with us. They mockingly state our identity in quotation marks as was done by NPR on June 21, 2016, "*Greg Quinlan of the group Parents and Friends of Ex-Gays & Gays, who describes himself as a "former homosexual," was among those who raised the subject.*"

34. The group Truthwinsout.org has majorly attacked me and tried to slander me. The founder, Wayne Besen, has made statements like "Someone needs to run Greg over or infect him with AIDS." That's pretty hateful rhetoric. He then attempted to sue me for slander for calling him out on his hate filled rhetoric on a TV program.

35. I absolutely believe that homosexuality is an unhealthy lifestyle. There is AIDS issues. But its more than that. It is psychologically traumatizing and shame filled lifestyle. It is empty and exploitative. The minister of Health, 18 months after the Netherlands codified homosexual marriage, did a secular study on HIV transmission, the highest transmission of the HIV infection was amongst partnered men. Of those partnered men, they on average admitted to seven to eight extra marital affairs during the homosexual relationship, and virtually zero were monogamous. The pathology of homosexuality does not change even after it has been codified. Homosexuality is about sex mixed with a lot of lies and false intimacy. The homosexual lifestyle is about sex. It is about the relationship of sex and that in itself is unhealthy.

36. While other forms of marriage besides man-woman marriage should not be codified because it memorializes unproven faith based assumptions, the right of self-determination should be. People should be allowed information so that they can make an informed choice whether to get into or get out of the gay lifestyle.

37. I get asked a lot if homosexuality involves civil rights, and my answer is that civil rights is based on innate and immutable traits, and by that definition, people who self-identify as gay or transgender should not be given suspect class status. The American Psychiatric Association has not established that there is proof of biologically gay individual. There have been tons of studies trying to prove that there is such thing as a gay gene. Like for example, the one conducted by Dean Hamer, who is a homosexual, whose study turned out to be faked.

I attest under the penalty of perjury that the above mentioned statements are true and accurate.



Gregory Quinlan

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

MASTERPIECE CAKESHOP et. al
plaintiffs

HARLEY et. al.
Intervening Plaintiffs

1:18-cv-02074-WYD-STV

v.

ELENIS et. al.
defendants

DECLARATION OF ROBIN GOODSPEED

I, Robin Goodspeed, declare under the penalty of perjury, pursuant to 28 USC sec. 1746 as follows:

1. I am over 18 and a resident of Wyoming.

BIOGRAPHY

2. I am a grateful Christian Ex Lesbian, Ex Queer. I was born in the 1950s and I lived most of my adult life as a lesbian. In 2009, in my 50s, I was freed from the horrible homosexual life I lived by the grace of God and the power of Jesus Christ. I was not born queer. I was not “born that way.” I was sexually abused in a life threatening way at the age of 2 by a female pedophile babysitter without the knowledge of my family. I was born and raised in Kansas City, Kansas and came from a middle class family with a working, agnostic father and a stay-at-home, devout Christian mother. I was the oldest of three siblings. I went to school and attended church.

However, as a result of being sexually abused, I suffered a nervous breakdown at the age of 13 and began a life-long battle with anger, depression, addiction, and suicide. I developed crushes on female teachers and coaches. I went from being a happy, active “A” student to an angry, depressed “D” student. I knew I needed help so I went to my church youth group. My youth

pastor, instead of helping me, offered me marijuana. I knew that was not help and refused. I turned away from the church and from God and became an angry atheist. I needed help desperately, but my family could not afford, and did not believe in, therapy and I began making choices that led to a life of homosexuality.

3. I had my first lesbian sexual experience in college after getting drunk and waking up in bed with my best female friend. In spite of my depression, eating disorder, alcohol addiction, and suicidal thinking, I was deeply ashamed of my first lesbian encounter. In my heart of hearts I knew it was wrong. My sexual abuse driven self-loathing was so deeply rooted that I refused to speak to school counselors. I stopped going to class and purposely flunked out of that school, trying to leave my lesbian partner and lesbian desires behind. This began another dysfunctional, life-long pattern of geographical cures, but it also forced my parents to admit that I needed help and the next year I saw my first therapist, an MD psychiatrist, while I went to junior college in my home town. However, I never talked about my lesbian experiences and lesbian desires to her and only talked about my depression and compulsive overeating. The next year I went to my home state university and the shame I felt about my lesbian attractions lessened as my addictive eating, alcoholic drinking, and suicidal obsession increased. I developed compulsive attractions to female students and finally began a secret, closeted lesbian relationship with one of my sorority sisters. My alcoholic drinking and suicidal obsession escalated and many nights I would get drunk, get behind the wheel of my car with the intent of killing myself, and wake up the next morning suffering from a blackout and not remembering how I got home. I know now that it was the grace of God that kept me from killing myself and/or someone else.

4. I finally managed to graduate from college, but my lesbian partner left me and I struck out for another city in the Midwest and became an “out”, angry, atheist lesbian. My depression,

addiction, and suicidal obsession never left me and I sought counseling help and was told for the first time that I was “born homosexual.” This was by a lesbian therapist at the state university in that city who also tried to seduce me. I sought out 12 Step groups, which have been called “poor man’s therapy”, because due to my dysfunctional life and dysfunctional work life, I did not have the money to seek out more professional therapy. I found the same “born homosexual” belief there and that fit well with my atheist belief system. My atheist religion worshipped at the altar of science and if a “professional” or the growing atheist culture told me that I was “born queer” then it was my DNA or my genes that were responsible for my life and my choices, not me. I also embraced the Higher Power concept of the 12 Step programs. As an atheist, I was the center of my own universe and the 12 Step programs taught me that I could make my Higher Power anything I wanted. That was code for my Higher Power being me. In spite of never finding healing or peace, I did keep from killing myself, learn to manage my misery better, and become more functional and productive.

5. I went to many counselors for depression, addiction, and suicide during the 1970’s, 80’s, and 90’s and beginning with the lesbian counselor every one of them told me what I have come to know as the blatant, bold faced lie of being “born homosexual.” On my 40th birthday, facing another suicidal crisis brought about by my emerging memories of life threatening sexual abuse, I was able to see a therapist who helped me face what had happened to me as a small child and heal the night terrors that I had suffered from for a life time. The suicidal compulsion was healed, but even this therapist who helped me face the sexual abuse I suffered as a small child, told me “That’s who you are. You’re a homosexual.” This was while I was on suicide watch. Again, a “professional” perpetrated the lie and I embraced the lie because, as a homosexual, I was never held accountable for my choices or the damage that I did to myself and others.

6. I embraced the homosexual life and lived for most of 35 years as an “out” lesbian. I brought my lesbian partners to work and all work functions in the corporate world where I worked in various administrative assistant positions. I participated in homosexual rights political groups like Human Rights Campaign (HRC) as a volunteer. I was an in-your-face, dyke on a bike, and rode my motorcycle in black leather with my lesbian partner in Gay Pride Parades. I helped manage a lesbian club committed to supporting the lesbian community where I lived and facilitating “hook-ups” for “late blooming” lesbians. I vacationed at homosexual resorts. But eventual long term sobriety and multiple lesbian relationships did not bring peace or remove my deep seated shame. I never even considered confronting the lie that I was “born that way.” I became a permanent, angry, atheist homosexual victim “constitutionally incapable of being honest with myself.”

7. In 2007 three life changing events occurred; the breakup of another lesbian relationship, the loss of another but more lucrative job, and the death of my father. Suffering shame, guilt, and grief and with the help of another 12 Step program, Adult Children of Alcoholics, for the first time I began to honestly question whether I was “born queer.” The only person in my life who had never surrendered to that lie, was my mother, a devout Christian. She never stopped praying for my healing, and in my heart of hearts, I knew that she was right and that I was wrong. God allowed these events, that I considered crises at the time, in order to reach me and I came to admit, eventually then emphatically, that I was not “born homosexual.” I went back to church. At first, I attended the denomination of my childhood at a large downtown cathedral in Portland, Oregon, the west coast city where I was then living. It embraced homosexuality and all of the men in the large choir, including the choir master and his partner, the main soloist, were homosexual. I began to realize that I had made choices that led to my life of homosexuality and

that I, and I alone, was responsible for those choices. As a permanent homosexual victim, I had made everyone and everything else responsible for my desperate unhappiness. With the death of my father, I had no one left to blame.

8. The last obstacles to my healing were the mountain of shame that I lived under and the paralyzing fear that I was too bad, too sinful for God to forgive me. I knew that I was going to hell because I had been living in my own hell on earth for a lifetime. I sincerely began searching for a Bible Believing Church and finally, in 2009, God led me to witness the filmed testimony of a man freed from alcoholism, drug addiction, and suicide through the power of Jesus Christ. I knew instantly that Jesus Christ could heal me of homosexuality. With tears streaming down my face, I fell to my knees in a dark, empty theatre and I asked Jesus to come into my heart and forgive me and He did. I was freed immediately from all desire to continue in the homosexual life and filled with an amazing and powerful peace.

9. I spent the next several years extricating myself from the lesbian prison that I had created for myself. God led me to a supportive Christian Evangelical Bible Preaching Church and Christian Singles Group where I was free to talk about my conversion experience, talk about leaving homosexuality, and share my Ex Homosexual testimony. I adopted a very simple litmus test for any Christian church that I wanted to attend. If a Christian pastor or minister refused to state that homosexuality is a sin from the pulpit or any of the congregation refused to state that homosexuality is a sin in public, then that was not a church that I wanted to be a part of. As an active atheist homosexual, I was a committed unrepentant sinner. As a Christian Ex Homosexual, I knew that I was not born that way and that homosexuality is a choice, a behavior, and a sin. There is no such thing as an unrepentant, committed, active homosexual Christian. The two are mutually exclusive. For my continued healing, I left the lesbian groups, friends, and small

business that I had been a part of. Through God's grace, I was able to eventually move from the west coast to the mountain west to be closer to my mother who had become ill. God facilitated a profound healing in me and a heartfelt reconciliation between me and my mother. My mother went to her heavenly reward in 2012, but she lived to see me accept Jesus Christ as my Lord and Savior, leave the heathen homosexual life that I had chosen, and begin to speak the truth about the choice, behavior, and sin of homosexuality.

THOUSANDS CHOOSE TO LEAVE HOMOSEXUALITY

10. I did not choose to be sexually abused as a child, but I did choose homosexuality. I was not "born queer." And through the grace of God and the power of Jesus Christ, today I am one of thousands of Ex Homosexuals who have left homosexuality. There are now excellent Licensed Professional Therapists doing Reparative Therapy that help children, adults, and families heal from sexual abuse and unwanted same sex attraction. All children, families, and adults deserve the choice to heal. Today innocent and abused children, like I was, are being deceived and enslaved in homosexuality by a growing amoral atheist culture that celebrates all promiscuity, a psychotherapy community that refuses to tell the truth about the choice and negative consequences of homosexuality, and a legal system that wants to criminalize, and then persecute for profit, the professionals trying to help. The dark design of a homosexual-driven agenda alleging reparative therapy harm intends to re-victimize children who have already been sexually abused and traumatized by sexual predators and then enslave them in the homosexual life until the age of 18, when the damage already done to them is harder to heal. This is cruel and inhumane punishment. The natural consequences of my choice to live a homosexual life were; shame, depression, anger, addiction, disease, and suicide. I never received the benefits of Professional Reparative Therapy, but the counseling and 12 Step support that I did receive kept

me alive long enough for God to finally reach and heal me. When I reached out for and received His help and healing, I was freed from the hideous homosexual life that I chose and all the misery that went with it. Thousands like me have left homosexuality and the grace of God, the power of Jesus Christ, and God's forgiveness and healing are available to all.

TESTIFYING AGAINST REPARATIVE THERAPY BANS

11. When God freed me from homosexuality He called me to stand up and speak up for the truth about homosexuality. I have spent the last several years sharing my experience as an Ex Homosexual and testifying against Reparative Therapy Bans, against Homosexual Marriage, and against Human Rights Ordinances, more accurately known as Homosexual Power and Privilege Ordinances. Here is a list of the testimonials that I have given, both oral and written:

History of Testifying Against Reparative Therapy Bans

Oral

- 2014/02/20 – Washington State Senate Committee – Olympia, WA – Defeated
- 2014/03/24 – Illinois State Legislature, HB5569 – Springfield, IL (Lobbying Only) – Defeated
- 2014/06/27 – Washington, D.C. City Council, Bill 20-501 – Washington, D.C. – Passed
- 2015/02/24 – Colorado House Committee Hearing, HB 1175 – Denver, CO – Passed
- 2015/04/08 – Colorado Senate Committee Hearing, HB 1175 – Denver, CO – Defeated
- 2015/04/28 – Oregon Senate Committee Hearing, HB 2307 – Salem, OR – Passed
- 2015/07/28 – Massachusetts Legislature Joint Committee Hearing, H97 – Boston, MA – Tabled
- 2016/03/08 – Colorado House Committee Hearing, HB 1210 – Denver, CO – Passed
- 2016/04/11 – Colorado Senate Committee Hearing, HB 1210 – Denver, CO – Defeated

Written

- 2016/02/10 – Hawaii Committee Hearing, HB 1675 – Defeated

2016/04/05 – New Hampshire Senate Committee Hearing, HB 1661 – Tabled

2016/04/07 – Vermont Senate Committee Hearing, S. 132 – Passed

History of Testifying/Lobbying FOR Ex Homosexuals and Reparative Therapy and
AGAINST Homosexual Marriage and Human Rights Ordinances

Oral

2013/02 – Wyoming Senate Committee Hearing, Homosexual Marriage Bill – Cheyenne, WY -
Defeated

2013/07/31 – Washington, D.C. – Ex Gay Lobby Day – Washington, D.C. (Lobbying Only)

2015/09/09 – Cheyenne City Council – Human Rights Ordinance – Cheyenne, WY - Defeated

Written

2016/06/03 – Iowa Board of Medicine Reparative Therapy Study Committee

NO SCIENTIFIC DATA FOR GENETIC HOMOSEXUALITY

12. The foundational lie of genetic homosexuality has been perpetrated throughout western culture by the homosexual cabal with no scientific proof whatsoever. Satan is the Father of Lies and many decades of repetition of the “born that way” lie, along with a false perception and promotion of homosexual victimhood has created a justification for homosexual power and privilege, which has always been the real agenda. The truth is that there is no scientific data or proof that there is a homosexual gene or that anyone is “born homosexual.” Homosexuality is not a civil right based on immutable factors like race or gender. (Yes, your DNA does define your immutable gender.) Homosexuality is a choice, a behavior, and a sin. The psychotherapy community knows the truth, but has been pushing the “born homosexual” lie for decades to gain political power. There is no scientific data to support a queer gene, but there are identical twin studies, among many others, that prove that homosexuality is a choice and a behavior. I am an

Ex Homosexual and I, and thousands like me, are the living proof that homosexuality is a choice. Our goal is to speak the truth to the world that there is incredible hope and healing available to all and anyone can choose to leave homosexuality.

Ellis, Mark. "Identical Twin Studies Prove Homosexuality Is Not Genetic." *HD, Life In*.

<http://www.hollanddavis.com/?p=3647>.

Whitehead, Neil and Briar. "Are Homosexuals Born That Way?" "What If I'm an Identical Twin?" "Can You Change Your Sexual Orientation?" *My Genes Made Me Do It!*

Lafayette, Louisiana: Huntington House Publishers. 40.1999. 163.1999. 194.1999.

ATHEISM

13. As an angry atheist for most of my life, I subscribed to the supremely self centered world view that I was the center of my own universe. Every atheist is the center of their own universe. If I couldn't see it, hear it, feel it, touch it, taste it, or think it, it didn't exist. Atheists do not believe in God, Satan, or sin, but atheists have a peculiar religious faith in what they understand. Atheists don't believe in right or wrong, just "relative" because the morality of atheism is power. Whoever has the power makes the rules. The three atheist poster children of the 20th century, Stalin, Hitler, and Mao murdered well over 100 million people between them, more than all the "religious" wars of the first 19 centuries put together. Attack atheists do have a religious belief system and atheists are the best little worker bees that Satan has ever had. Satan's most powerful accomplishment was to convince men that he didn't exist. Yet, Satan was driven from heaven because he wanted to be God. Satan wanted the power of God. Atheists are Satan's true children because even though they don't believe he exists what they crave is power.

14. As an angry atheist homosexual, power was what I craved in my life and power is the one and only goal of the homosexual cabal. As an individual, mostly dysfunctional, homosexual, my

untreated and unhealed sexual abuse driven core was rage. It was always simmering just beneath the surface ready to erupt in suicidal or homicidal fury. Rage was the energy that I stoked and used to power myself through my life. In the 35 years of my homosexual life I never met a lesbian or homosexual who didn't have some abuse in their history and some rage that they could channel at will. Rage is a miserable way to live, but it is very effective in achieving goals because there are no distractions. The homosexual cabal is powered by rage and craves one thing and one thing only, power. Everything the homosexual lobby does is to achieve their infinite desire for power, and there is never enough power. Homosexual activists are not interested in equality. They want what I call the three P's; power, privilege, and pay back. The Human Rights Campaign is euphemistically named to hide their true agenda. A more truthful name would be Homosexual Rule Campaign. All the true goals of the homosexual lobby are intentionally camouflaged to hide their truly sinister agenda.

15. As a hate filled atheist lesbian, my personal motives were often evil. There is no other word for it and I knew it. As a wounded abuse victim full of rage, I often wanted to hurt others. This is a very common dynamic in psychotherapy. Victims become perpetrators. As an atheist with no solid moral restraints, it was but for the grace of God that I didn't succeed in doing more harm than I did when my rage became uncontrollable, up to and including murder. This is also true of the homosexual cabal. There is not only a desire for power and control but for payback. As a homosexual, I was a worker bee for Satan, and though I professed not to believe in God or Satan, I knew how evil my true motives were. Payback for the homosexual activists includes persecution and punishment. As a child, I was recruited into Satan's sin of homosexuality through the unhappy circumstances of hidden pedophile sexual abuse as a small child; a lack of family or church support for healing; and dishonest, abusive, homosexual-driven therapy "born

queer” lies. The dark homosexual atheist agenda is to intentionally recruit future generations of children into homosexuality by attacking, persecuting, punishing, and eliminating Christianity; criminalizing effective reparative therapy; and promoting, celebrating, and legalizing the atheist amoral belief system of increasing sexual promiscuity and perversion.

LGBT HATE, HATE GROUPS AND THE POLITICAL POWER AGENDA

16. Homosexuals, driven by hate and truly guided by Satan whether they admit it or not, have been organized, effective, and relentless over a very long time. There is truly a battle between principalities and powers raging in the heavens and we in America have not come to the state of our current collapsing culture by accident. Three of the organizations that I have come in contact with while testifying as an Ex Homosexual in the last few years are dedicated to the work of advancing homosexual rule and Christian collapse: Southern Poverty Law Center (SPLC), Human Rights Campaign (HRC), and the National Center for Lesbian Rights (NCLR). There are many more, but these three are worth mentioning in more detail.

17. SPLC (Southern Poverty Law Center) is located in Montgomery, Alabama, and is organized as a non-profit, but is in reality a multi-million dollar law firm committed to targeting, persecuting, and prosecuting groups and individuals that it identifies as “Hate” groups. SPLC originated in the south fighting groups like the KKK, but has been high jacked by the LGBT cabal. SPLC has a \$350 million war chest. The majority of this money is now solicited from homosexuals who donate money to protect their homosexual power and privilege, to punish their perceived attackers, and because they have no children to pledge their estates as they die from the natural consequences of homosexuality. SPLC maintains a “Hate Map” on its website that includes numerous Christian groups and individuals supporting Christian family values. They place Licensed Professional Reparative Therapists and groups helping clients heal from

unwanted same sex attractions on the SPLC “Hate Map.” The SPLC LGBT Rights Project is dedicated to promoting the false pseudoscience of genetic homosexuality. Their goal is to profit from persecuting, prosecuting and eventually eliminating Reparative Therapy by alleging undocumented, unproven harm. SPLC initiated the suit of Ferguson v. JONAH in 2014 in the state of New Jersey and won by exploiting recruited, dishonest plaintiffs; biased judge and court proceedings; and overly broad New Jersey consumer fraud laws. SPLC forced JONAH, a Jewish group helping Jewish men heal from unwanted same sex attractions, out of business.

18. HRC (Human Rights Campaign) is a national, multi-million dollar, non-profit, lobbying organization, located in Washington D.C. The cofounder of HRC, Terry Bean, is a homosexual activist who has been a major fund raiser for the Democratic Party, including President Obama. In 2014 he was arrested in Portland, Oregon for having sex with a 15 year old boy and recording it on video, but was never tried because the boy and his mother declined and were rumored to be paid not to testify. This is the anecdotal tip of the hate filled homosexual HRC iceberg. HRC is committed to creating, maintaining, and enforcing a protected, privileged LGBT class through lobbying and legislation that enables LGBT lawyers to target, prosecute, and profit from attacking organizations and individuals exercising their First Amendment Rights to Freedom of Speech and Freedom of Religion. HRC initiates and funds lobbying for Human Rights Ordinances in strategic cities and states throughout the US and has been instrumental in President Obama’s Transgender Predator Bathroom Decree. HRC is responsible for proposing legislative bans on Reparative Therapy using alleged, undocumented claims of harm with a primary goal of establishing a national therapy ban. Since its inception, HRC has been intrinsically involved in advancing LGBT Power and Privilege through legislation at every level.

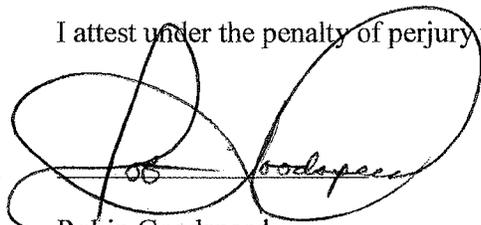
19. NCLR (National Center for Lesbian Rights) is a million dollar, non-profit law firm and lobbying agency located in San Francisco, California and dedicated to enforcing LGBT Privilege through litigation, legislation, policy, and public education. The 2014 NCLR “Born Perfect” campaign specifically targeted Reparative Therapy using the fraudulent pseudoscience of biological homosexuality as justification. NCLR lawyers lobby for and profit from advancing therapy bans by attacking Licensed Professional Therapists for undocumented harm. This results in punishing thousands of therapy clients by eliminating freedom of client choice to heal from sexual abuse, trauma, unwanted same sex attraction, and the natural consequences of homosexual behavior including depression, addiction, disease, and suicide. NCLR is also involved in lobbying the UN for LGBT rights and privileges at the international level.

CONCLUSION

20. I am a grateful Christian Ex Lesbian who is committed to exposing the lie of genetic homosexuality; confronting the queer power, privilege, and recruiting agenda; and joining with thousands of other Ex Homosexuals to share the hope and healing available to all who seek it. I was born in the 1950s, sexually abused as a small child, and lived my adult life as an angry atheist lesbian. For decades I went to counselors for depression, addiction, and suicide and believed the propaganda of biological homosexuality, unsupported by scientific data, because I could remain a permanent, perpetual victim. I was freed from the misery of homosexuality in my 50's by the grace of God, the power of Jesus Christ, and the prayers of my Christian mother who never gave up on me. As a Christian Ex Homosexual, I am living proof that homosexuality is a choice, a behavior, and a sin. There is no such thing as an unrepentant, active homosexual Christian. I began to testify against Reparative Therapy bans, work with Ex Homosexual groups, and fight against queer legal lobbying organizations like SPLC, HRC, and NCLR that proselytize

children into homosexuality and persecute therapists and Christians for profit. The attack atheist religion is marching and I have been called to stand for God's Truth and to share His hope and His healing.

I attest under the penalty of perjury that the above mentioned statements are true and accurate.

A handwritten signature in black ink, appearing to read "Robin Goodspeed". The signature is stylized with large, overlapping loops and a horizontal line across the middle.

Robin Goodspeed

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

<p>MASTERPIECE CAKESHOP INCORPORATED et. al.</p> <p>V.</p> <p>AUBREY ELENIS et. al.</p>		<p>Case No: 1:18-cv-02074-WYD-STV</p>
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ORDER

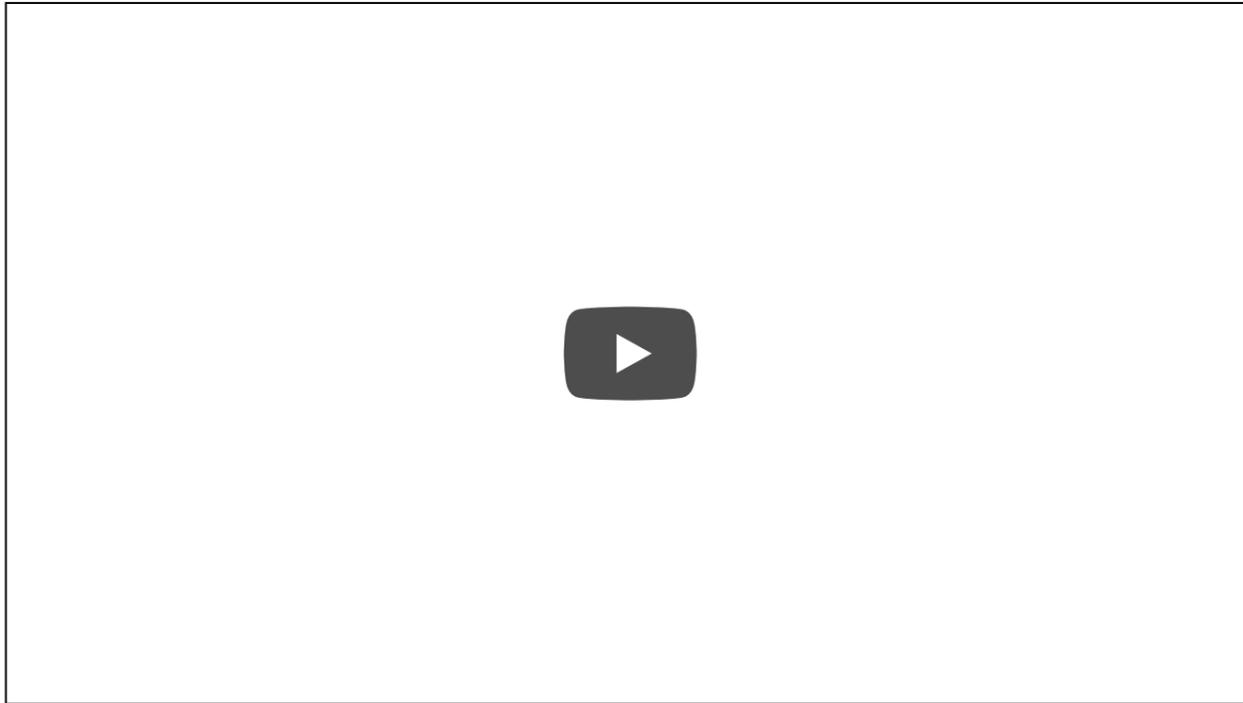
Before the Court is a motion for leave for Center For Garden State Families to file an *amicus brief*. The motion is GRANTED. The docketing clerk will entire the *amicus brief* as a separate docket entry.

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The Honorable Judge Daniel

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Marriage Constitution Restoration Act

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SUMMARY

Understanding the Marriage And Constitution Restoration Act

Understanding the Marriage And Constitution Restoration Act



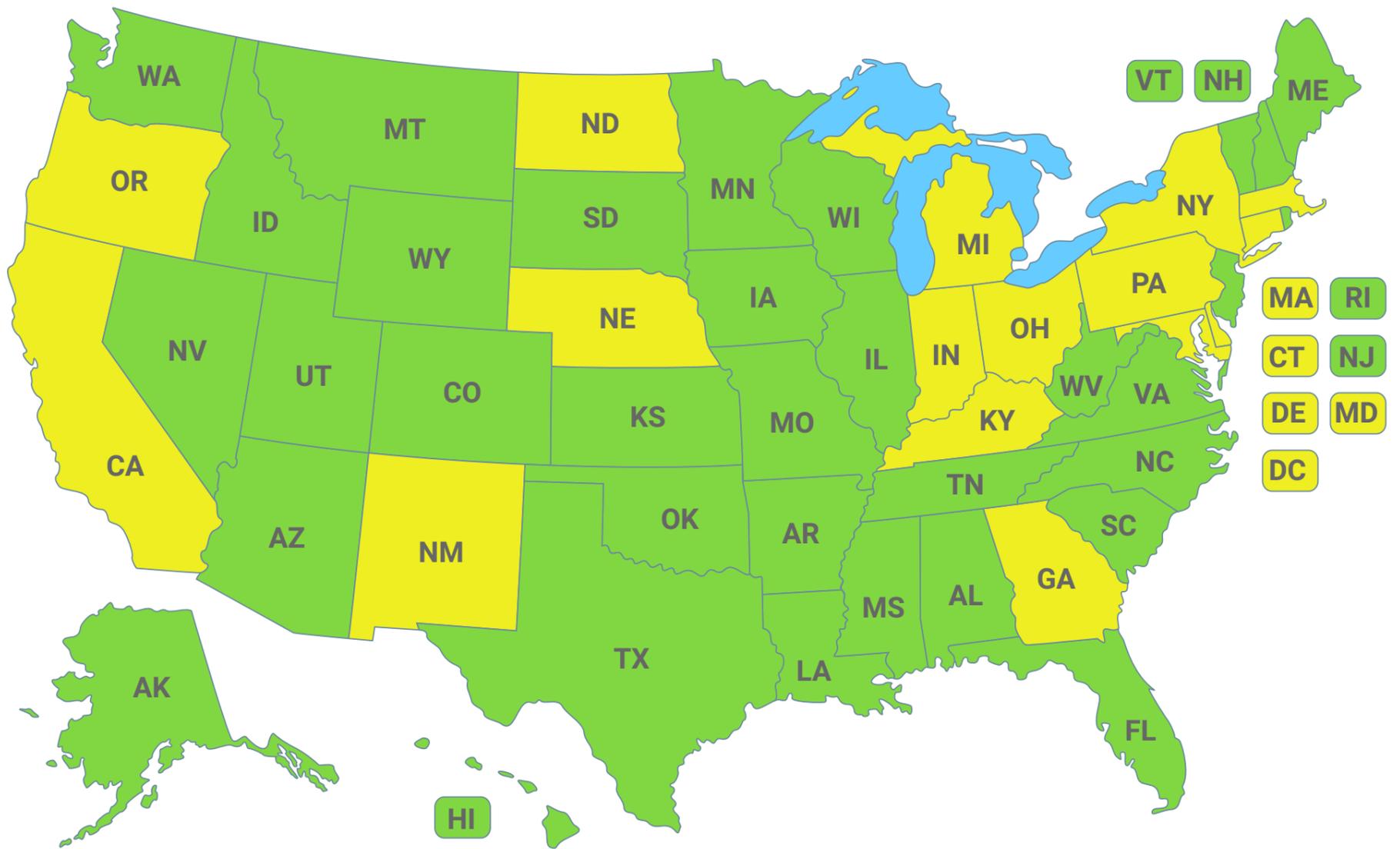
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Religion of Secular Humanism



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WISCONSIN**MACRA – DRAFT****Secular Human Resolution****UNDERSTANDING THE ACT****LEMON TEST**

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LEMON TEST

1. What Is The Lemon Test?



Marriage And Constitution Restoration Act

What Is The Lemon Test?

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The Marriage And Constitution Restoration Act centers on the idea that gay marriage policy, sexual orientation statutes, transgender bathroom ordinances, and conversion therapy bans fail the Lemon Test and therefore violate the Establishment Clause of the United States Constitution. To pass muster under the Establishment Clause, a practice must satisfy the Lemon test, pursuant to which it must: (1) have a valid secular purpose; (2) not have the effect of advancing, endorsing, or inhibiting religion; and (3) not foster excessive entanglement with religion. Id. at 592 (citing Lemon v. Kurtzman, 403 U.S. 602 (1971)). It is important to understand that government action "violates the Establishment Clause if it fails to satisfy any of these prongs." Edwards, 482 U.S. 578 at 583; Agostini v. Felton, 521 U.S. 203, 218 (1997).

In view of the testimony of ex-gays, medical professionals, and ministers, gay marriage policy, sexual orientation discrimination statutes, transgender bathroom ordinances, and conversion therapy bans violate all three prongs of the Lemon test by a landslide in their making and in their enforcement. It is not a close call. There are millions of taxpayers who believe that all forms of parody marriage are immoral. They also believe that to enable acts of immorality is itself an act of immorality. It is coercive for the tax dollars of non-observers of Secular Humanism to be used to endorse parody marriages that do not involve one man and one woman because it makes them feel culpable of condoning immorality. When a person is legally married they are entitled to what is called a "constellation of benefits" that flows from the general fund. These taxpayers in this State have standing to enjoin the State from making or enforcing parody marriage policy, sexual orientation discrimination statutes, transgender bathroom ordinances, and conversion therapy bans because the policies themselves are (1) a non-secular shams that (2) have the effect of creating an indefensible legal weapon against non-observers of the religion of Secular Humanism, while (3) serving to excessively entangle the government with the religion of Secular Humanism. Policies that promote parody marriages do not accomplish their intended purposes and are based on a series of unproven faith-based assumptions and naked assertions that are implicitly religious and inseparable from the Secular Humanism. The two keys to this bill are understanding the Lemon test and the significance of the fact that the Supreme Court has held that Secular Humanism is a religion for the purposes of the Establishment Clause.

2. How Does Gay Marriage Policy Fail Prong One Of The Lemon Test?



Marriage And Constitution Restoration Act

How Does Gay Marriage Policy Fail Prong One Of The Lemon Test?

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The State's enforcement of gay marriage policy and the State's enforcement or prospective enforcement of sexual orientation discrimination statutes, transgender

bathroom ordinances, or conversion therapy bans violate prong one of Lemon because those policies are not “secular” and because they are the ultimate “sham” for purposes of the Establishment Clause, since they have an underlying primary religious objective. At the core of the “Establishment Clause is the requirement that a government justifies in secular terms its purpose for engaging in activities which may appear to endorse the beliefs of a particular religion.” *ACLU v. Rabun County Chamber of Commerce, Inc.*, 698 F.2d 1098, 1111 (11th Cir. 1983). This secular purpose must be the “pre-eminent” and “primary” force driving the government’s action, and “has to be genuine, not a sham, and not merely secondary to a religious objective.” *M McCreary County, Ky. v. ACLU of Ky.*, 545 U.S. 844 (2005). There are at least seven reasons why legally recognized gay marriage violates prong one of Lemon provided in motions for summary judgment and amicus briefs posted under the tab called “Law for Attorney Generals.” First, in the wake of Obergefell, there has not been a land rush on gay marriage. The raw numbers tell the tale. Prior to the Obergefell decision two years ago, the 7.9 percent of gays who were married would have amounted to 154,000 married gay couples. Two years later, this had grown to 10.2 percent or 198,000 married couples. Second, gay marriage policies are a total sham because while there has not been a land rush on gay marriage, there has been a land rush on Christian persecution. Third, while there has not been a land rush on gay marriage, there has been a land rush by Secular Humanists to infiltrate elementary schools with the purpose of indoctrinating minors to the Secular Humanism ideology on sex, faith, morality, marriage, and truth. Fourth, the fact that majority in Obergefell pretended that gay rights were civil rights like race-based civil rights are, when race-based civil rights are actually based on immutability, shows that gay marriage policy and all other pro-gay policies are sham. Fifth, the fact that in the wake of Obergefell self-identified homosexuals continue to protest ex-gay conventions because the testimony of ex-gays causes the legal basis behind the fake gay civil rights plight to implode shows that the government’s endorsement of LGBTQ ideology is a sham. Sixth, the fact that parody marriages have never been a part of American history and tradition and that gay marriage was basically illegal until *Lawrence v. Texas*, 539 U.S. 558 (2003) recently overturned *Bowers v. Hardwick*, 478 U. S. 186 (1986), and yet the Court pretended otherwise by monkeying with the Fourteenth amendment’s Substantive Due Process Clause shows that gay marriage policy is a sham. The purpose of the government’s decision to entangle itself with the LGBTQ church was to promote tolerance and equality for a pretend people group, and because the “stated purpose [of the government’s entanglement with the LGBTQ church has] not [been] actually furthered...then that purpose [must be] disregarded as being insincere or a sham.” *Church of Scientology v. The city of Clearwater*, 2 F.3d 1514, 1527 (11th Cir. 1993).

3. How Does Gay Marriage Policy Fail Prong Two Of The Lemon Test?



Marriage And Constitution Restoration Act

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How Does Gay Marriage Policy Fail Prong Two Of The Lemon Test?

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Under this second prong of the Lemon test, courts ask, “irrespective of the... stated purpose, whether [the state action]... has the primary effect of conveying a message that the [government] is advancing or inhibiting religion.” *Indiana Civil Liberties Union v. O’Bannon*, 259 F.3d 766, 771 (7th Cir. 2001). The “effect prong asks whether, irrespective of government’s actual purpose,” *Wallace v. Jaffree*, 472 U.S. 38, 56 n.42 (1985), the “symbolic union of church and state...is sufficiently likely to be perceived by adherents of the controlling denominations as an endorsement, and by the non-adherents as a disapproval, of their individual religious choices.” *School Dist. v. Ball*, 473 U.S. 373, 390 (1985); see also *Larkin v. Grendel’s Den*, 459 U.S. 116, 126-27 (1982)(even the “mere appearance” of religious endorsement is prohibited). In the wake of the Obergefell and Windsor putsch, there has not been a land rush on gay marriage, but there has been a land rush by Secular Humanists to persecute Christians for refusing to endorse a religious worldview that non-observers of Secular Humanism believe is self-evidently immoral, obscene, and subversive to human flourishing. While “gay marriage” is “fake marriage,” the government’s endorsement of homosexual orthodoxy has led to the “very real” persecution of Christians. The unconstitutional codification of the fake gay civil rights movement amount to an indefensible “legal weapon that no [Christian or non-observer of Secular Humanism] can obtain.” *City of Boerne v. Flores*, 521 U.S. 507 (1997). A “gay marriage license” issued by the state amounts to a government-issued “license to oppress.” That is the effect of the government’s unconstitutional entanglement with the religion of Secular Humanism. It is an evil that the Establishment Clause does not allow. The CADA statute that Jack Phillips was sued under violated the Establishment Clause in its making (it took state action to create it) and in its enforcement for failing prong two of Lemon. Alliance Defending Freedom refused to make that argument because they are more interested in defending donations and persecution is good for their business model.

4. How Does Gay Marriage Policy Fail Prong Three Of Lemon?



Marriage And Constitution Restoration Act

How Does Gay Marriage Policy Fail Prong Three Of Lemon?

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The State's enforcement of gay marriage policy or its potential enforcement of transgender bathroom policies, conversion therapy bans, or sexual orientation discrimination statutes excessively entangles the government with the religion of Secular Humanism because it enshrines one narrow and exclusive version of postmodern western individualistic moral relativism, i.e. Secular Humanism, as the irrefutable supreme national religion. In *re Young*, 141 F.3d 854 (8th Cir 1998); *Westchester Day School v. Village of Mamaroneck*, 504 F.3d 338, 349 (2d Cir. 2007). In the wake of the *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015) and the *United States v. Windsor*, 133 S. Ct. 2675, 186 L. Ed. 2d 808 (2013) judicial putsch, there has not been a land rush on gay marriage, but there has been a land rush by Secular Humanists to infiltrate elementary schools with the purpose of indoctrinating minors to a worldview on marriage, morality, and sex that is questionably real, moral, decent, and non-secular. The Supreme Court has emphasized that there are "heightened concerns with protecting freedom of conscience from subtle coercive pressure in the elementary and secondary public schools," *Lee v. Weisman*, 505 U.S. 577, 592 (1992). The Federal courts have thus "been particularly vigilant in monitoring compliance with the Establishment Clause" in the public-school context, see *Edwards v. Aguillard*, 482 U.S. 578, 583 (1987). The legislature has a duty under Article VI to be vigilant as well to keep Secular Humanists from indoctrinating minors to Secular Humanist's religious worldview. The government's endorsement of gay marriage policy has had the effect of entitling Secular Humanists to impose their religious beliefs on minors in public schools in a manner that demonstrates that gay marriage policy and sexual orientation statutes are religious shams that violate the Establishment Clause. Because tax dollars are flowing from the general fund to finance the distribution of a constellation of benefits to self-identified homosexuals who legally marry and because there are hundreds of thousands of taxpayers in every state who do not want to play a role in enabling parody marriages, the enforcement of gay marriage policy fails prong three of the Lemon Test for excessively entangling the government with the religion of Secular Humanism and therefore violates the First Amendment Establishment Clause.

SECULAR HUMANISM IS A RELIGION

5. What Is Religion Really?



Marriage And Constitution Restoration Act

What Is Religion Really?

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All "religion" amounts to is a set of answers to the greater questions, like "why are we here" and "what should humans be doing." "Religion" is, therefore, a set of unproven truth claims and naked assertions that can only be taken on faith. The Establishment Clause was never designed to single out "institutionalized religions," like Christianity and Judaism, which tends to parallel transcultural self-evident truth that serves as the master narrative of the Constitution itself. The Establishment Clause also was designed – if not more so – to prohibit the government from legally codifying the truth claims floated by "non-institutionalized religions" as well, to include the truth claims asserted by the religion of postmodern western moral relativism and expressive individualism. Currently, "secularism" is having a full-blown crisis because "secularism" is a "religion" in most respects that only pretends to be neutral.

6. What Is The Religion Of Secular Humanism?



Marriage And Constitution Restoration Act

What Is The Religion Of Secular Humanism?

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Ex-gays, medical professionals, and licensed ministers have provided testimony under oath in support of this bill that sexual orientation has nothing to do with immutability or the Fourteenth Amendment, but rather, sexual orientation is a religious orthodoxy that is inseparably linked to the religion of Secular Humanism. The United States Supreme Court (and most of the Federal Courts of appeals) have held that Secular Humanism is a religion for purposes of the Establishment Clause. See the Supreme Court decisions in *Torcaso v. Watkins*, 367 U.S. 488 (1961) and *Edwards v. Aguillard*, 482 U.S. 578, 583 (1987). (“Among religions in this country, which do not teach what would generally be considered a belief in the existence of God, are Buddhism, Taoism, Ethical Culture, Secular Humanism, and others.” See Also *Washington Ethical Society v. District of Columbia*, 101 U.S. App. D.C. 371, 249 F. 2d 127 (1957); 2 *Encyclopaedia of the Social Sciences*, 293; J.Archer, *FaithsMenLive By* 120–138, 254–313 (2d ed. revised by Purinton 1958); Stokes & Pfeffer, *supra*, n.3, at 560. *Welsh v. U.S.*, 1970398 U.S. 333 (U.S. Cal. June 15); *Wells v. City and County. of Denver*, 257 F.3d 1132 (2001)). There is hardly anything “secular” about the religion of “Secular Humanism.” The first amendment was never just designed to single out institutionalized religions to keep the government from respecting its doctrine. The Establishment Clause was designed, if not more so, to prevent moral relativists from using government to enshrine their Secular Humanist dogma. In *Real Alternatives*, the Seventh Circuit Court of Appeals stated: “we detect a difference in the “philosophical views” espoused by [the litigants], and the “secular moral system[s]...equivalent to religion except for non-belief in God” that Judge Easterbrook describes in *Center for Inquiry*, 758 F.3d at 873. There, the Seventh Circuit references organized groups of people who subscribe to belief systems such as Atheism, Shintoism, Jainism, Buddhism, and secular humanism, all of which “are situated similarly to religions in everything except belief in a deity.” *Id.* at 872. “These systems are organized, full, and provide a comprehensive code by which individuals may guide their daily activities.” Instead of having across or the ten commandments, the LGBTQ church has the gay pride flag and their own commandments, such as if you disagree with LGBTQ ideology you are a bigot worth marginalizing. The unproven naked truth claims evangelized by the LGBTQ church such as (1) there is a gay gene, that (2) people can be born in the wrong body, that (3) same-sex sexual activity checks out with the human design, that (4) same-sex buggery is not immoral, and that (5) people come out of the closet are baptized gay consists of a series of unproven faith-based assumptions that are implicitly religious and take a huge amount of faith to believe are even plausible.

7. What Is The Problem With The ACLU And The Freedom From Religion Foundation?



Marriage And Constitution Restoration Act

What Is The Problem With The ACLU And The Freedom From Reli...

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The ACLU and Freedom From Religion Foundation are constantly pushing to entangle the government with the religion of Secular Humanism that they ardently subscribe to. Both of these organizations are too intellectually blind and dishonest to see or admit that they have been working for decades to entangle the government with their religion – establishing Secular Humanism as the national supreme religion. The problem for the ACLU and the Freedom From Religion Foundation is that the Supreme Court and just about every Circuit Court has held that Atheism is a religion. *Wells v. City and County. of Denver*, 257 F.3d 1132 (2001). The reason why in *Van Orden v. Perry*, 545 U.S. 677 (2005), Justice Breyer in his concurrence stated that “the Establishment Clause does not compel the government to purge from the public sphere all that in any way partakes of the religious” because “[s]uch absolutism is not only inconsistent with our national traditions, but would also tend to promote the kind of social conflict the Establishment Clause seeks to avoid” was because western postmodern moral relativism is a religion whose faith-based dogmatic unproven truth claims cannot be respected through government recognition.

DEFENDING THE INTEGRITY OF THE RACE-BASED CIVIL RIGHTS MOVEMENT LEAD BY DR. MARTIN LUTHER KING JR.

8. What Does ‘Love Is Love’ Really Mean?



Marriage And Constitution Restoration Act

What Does Love Is Love Really Mean?

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When people say that "love is love" what they really mean is that they are perfectly ok with government assets being used to crush anyone who believes that homosexuality is immoral or subversive to human flourishing. Such a position is categorically "unloving." It is more accurate to say that "love without truth is shallow sentimentality." One thing that the fake gay civil rights movement has managed to prove is that people who are "intolerant" of "intolerant people" are "intolerant;" people who are "judgmental" against "judgmental people" are "judgmental;" people who are "dogmatic" about not being "dogmatic" are themselves "dogmatic." As Justice Kennedy stated in Masterpiece Cakeshop, "tolerance has to cut both ways."

9. Do gay people exist or do only self-identified gay people exist?



Marriage And Constitution Restoration Act

Is there such thing as gay people or is there only self-identified g...

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There is no such thing as "homosexuals." There are only some people who "self-identify" as "homosexual" for at least some period of time. While people have the right under the Free Exercise clause to form self-asserted sex-based identity narratives, the Establishment Clause prohibits the government from respecting and recognizing identify narratives that are questionably real, moral, and decent. Sex-based identity narratives are semi-religious in nature. While there is no such thing as "ex-blacks," there are thousands of ex-gays. The First Amendment in balancing the Free Exercise Clause and the Establishment Clause has exclusive jurisdiction in resolving the question as to which marriages the States can recognize and how the States must respond to self-asserted sex-based identify narratives that are questionably real, moral, and have a tendency to erode community standards of decency. It is intellectually, racially, sexually, and emotionally dishonest for Secular Humanists advocate the unprincipled ploy that the Fourteenth Amendment has anything to do with answering how the States must legally define marriage.

10. The Marriage And Constitution Restoration Act Defends The Race Based Civil Rights Movement.



Marriage And Constitution Restoration Act

The Marriage And Constitution Restoration Act Defends The Race...

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Make no mistake any legislator who supports or sponsors this act are defending the integrity of the civil rights movement led by Pastor Martin Luther King Jr. Anyone who compares the "gay civil rights plight" to the "race-based civil rights plight," whereas the race-based civil rights plight was actually based on immutability, only to not really mean it, has engaged in acts of fraud and racial animus in-kind that manages to be emotionally, intellectually, sexually, and racially exploitative. To oppose the government's unconstitutional endorsement of homosexual ideology is to defend the civil rights movement led by Pastor Martin Luther King Jr. To embrace the fake gay rights movement is deeply offensive to people of color who were required at one point to walk to school, drink from the colored water fountain, and undergo mistreatment for characteristics that are without question based on genetics and immutability, not emotional faith-based beliefs. If a government official supports the government's endorsement of gay rights, they are refusing to think logically and can be accused of bigotry in-kind. Legislators support this act support the rule of law and the supremacy of the United States Constitution. Those who oppose this act that balances the Free Exercise Clause with the Establishment Clause are on the wrong side of history and reality. While there are thousands of ex-gays, there is no such thing as an "ex-black person." Help us safeguard and restore the integrity of the civil rights movement led by Dr. Martin Luther King Jr. by standing behind the Marriage And Constitution Restoration Act.

See the Amicus brief by the National Coalition of Black Pastors under the tab entitled "Law For Attorney Generals".

THE MARRIAGE AND CONSTITUTION RESTORATION ACT WILL OVERRULE OBERGEFELL

11. How will the Marriage And Constitution Restoration Act overrule Obergefell?



Marriage And Constitution Restoration Act

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How will the Marriage And Constitution Restoration Act overrule ...

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When President Obama came into office, he emphasized that he wanted to appoint Judges to the Court who would demonstrate empathy. The entire basis for the Supreme Court in Obergefell to force the government to respect gay marriage policy was predicated on a series of emotional appeals and naked assertions that were implicitly religious in nature. Justices, like Ginsburg and Sotomayor, were moved by the stories of self-identified homosexuals who were dropped off in the middle of nowhere by taxi cab drivers, denied medical treatment, and assaulted, simply because they identified as homosexual. While those stories are tragic, they do not justify the Supreme Court's decision to misuse the Fourteenth Amendment in a manner in which it was never designed. There are other forms of relief already in place for victims who were wronged by taxi drivers, hospitals, and assailants. In *Holloman v. Harland*, 370 F.3 1252 (11th Cir. 2004), an elementary school teacher required her students to have a moment of silence to start the day. She had really good emotional and pragmatic reasons for doing so. Yet, the Eleventh Circuit found that the moment of silence had a primarily religious purpose. The effect of the *Holloman* decision was that emotional appeals do not allow government actors to usurp the Establishment Clause. The *Windsor* and *Obergefell* Courts allowed emotional and pragmatic appeals to override the Establishment Clause by pretending that self-identified gay people were a class of people for purposes of the Fourteenth Amendment. Yet, the truth is that self-identified gay people are a part of a denominational sect within the overall religion of Secular Humanism. While there is no such thing as ex-blacks, ex-whites, ex-asians, and ex-hispanics, there are thousands of ex-gays, whose testimony voids the Federal Courts of Subject Matter and Personal Jurisdiction under claims brought by self-identified homosexuals under the Fourteenth and Fifth Amendments. The government cannot respect or recognize the LGBTQ dogma through creating or enforcing policies because the ideology is based on a series of unproven faith-based assumptions and naked assertions that are implicitly religious in nature.

12. Did The Secular Humanist Judges In Obergefell Have Bad Motives In Monkeying With The Fourteenth Amendment?



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Did The Secular Humanist Judges Have Bad Motives In Monkeyin...

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When President Obama came into office, he emphasized that he wanted to appoint Judges to the Court who would demonstrate empathy. The entire basis for the

Supreme Court in Obergefell to force the government to respect gay marriage policy was predicated on a series of emotional appeals and naked assertions that were implicitly religious in nature. Justices, like Ginsburg and Sotomayor, were moved by the stories of self-identified homosexuals who were dropped off in the middle of nowhere by taxi cab drivers, denied medical treatment, and assaulted, simply because they identified as homosexual. While those stories are tragic, they do not justify the Supreme Court's decision to misuse the Fourteenth Amendment in a manner in which it was never designed. There are other forms of relief already in place for victims who were wronged by taxi drivers, hospitals, and assailants. In *Holloman v. Harland*, 370 F.3 1252 (11th Cir. 2004), an elementary school teacher required her students to have a moment of silence to start the day. She had really good emotional and pragmatic reasons for doing so. Yet, the Eleventh Circuit found that the moment of silence had a primarily religious purpose. The effect of the *Holloman* decision was that emotional appeals do not allow government actors to usurp the Establishment Clause. The *Windsor* and *Obergefell* Courts allowed emotional and pragmatic appeals to override the Establishment Clause by pretending that self-identified gay people were a class of people for purposes of the Fourteenth Amendment. Yet, the truth is that self-identified gay people are a part of a denominational sect within the overall religion of Secular Humanism. While there is no such thing as ex-blacks, ex-whites, ex-asians, and ex-hispanics, there are thousands of ex-gays, whose testimony voids the Federal Courts of Subject Matter and Personal Jurisdiction under claims brought by self-identified homosexuals under the Fourteenth and Fifth Amendments. The government cannot respect or recognize the LGBTQ dogma through creating or enforcing policies because the ideology is based on a series of unproven faith-based assumptions and naked assertions that are implicitly religious in nature.

13. What Was The Real Implication Of The Masterpiece Cakeshop Decision?



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What Was The Real Implication Of The Masterpiece Cakeshop Dec...

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The 7 to 2 decision in *Masterpiece Cakeshop v. the Colorado Civil Rights Commission*, 584 U. S. ____ (2018) shows that the decisions in *Obergefell* and *Windsor* were a political ploy and an unprincipled misapplication of the Fourteenth and Fifth Amendments. There is no such thing as "partial civil rights movements." If the "gay civil rights movement" was an actual a "civil rights movement," then Jack Phillips should have been required to defy his religious beliefs and bake the cake for the self-identified homosexual couple. Secular Humanists on the Supreme Court have been behaving like children who have been caught in a lie because they have been exposed for having monkeyed with the Fourteenth Amendment by misapplying it to create a law that entangles the government with Secular Humanism. Imagine if after the race-based civil rights movement of the 1960s, blacks could still be barred from military service or they still could be required to ride on the back of the bus. Discrimination on the basis for color is an evil that cuts across aspects of society because unlike sexual orientation it really is based on immutability and genetics. The gay civil rights movement is about Secular Humanists entangling the government with their private code to ratify a moral superiority complex that is dangerous, desensitizing, depersonalizing, dehumanizing, and destructive and most importantly non-secular. The fake gay civil rights movement is an effort by devout moral relativists to use government to explain away the natural feelings of shame and inadequacy that come from engaging in forms of sex that violate the givenness of our nature and the truth about the way things are and the way we are. Instead of trying to make all sides happy, the Federal Court judges should have just done their job by enforcing the Constitution as it was written and not as how devout Secular Humanists wished that it was. The Marriage And Constitution Restoration Act restores the integrity of the Constitution. All patriots will stand behind this act.

14. If Obergefell Was Overruled Would Marriage Go Back To The States To Decide?



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If Obergefell Was Overruled Would Marriage Go Back To The Stat...

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No, because the United States Constitution is not silent as to how all 50 states are required to legally define marriage. The majority in *Obergefell* was absolutely correct in finding that the United States Constitution is not silent as to how all 50 states must legally define marriage. The dissent was dead wrong in their cop-out position that the decision of how marriage should be defined should be left to the individual states to decide. The Majority was dead wrong in pretending that the Equal Protection

and Substantive Due Process Clause of the Fourteenth Amendment held the answer as to how marriage should be defined. The testimony of ex-gays, medical experts, and persecute Christians demonstrates that the First Amendment Establishment Clause and Free Exercise Clause have exclusive jurisdiction over how the States must respond to marriage requests of all kinds that do not involve one man and one woman and how the States must react to self-asserted sex-based identity narratives that are questionably real, moral, and decent. At oral argument in Obergefell, Justice Sotomayor, who ultimately voted in favor of gay marriage correctly stated that "the United States is not a pure Democracy. It is a Constitutional Republic." She was right. The ultimate result of Obergefell is that all 50 states, to include deep blue ones that actually voted to legalize gay marriage through the Democratic process, are required to at the very most only legally recognize marriage between "one man and one woman," since it is the only secular form that the Constitution permits all fifty states to recognize. The First Amendment Establishment Clause prohibits all 50 states from legally recognizing, respecting, endorsing, or enforcing any parody marriage policy, sexual orientation discrimination statute, transgender policy, or conversion therapy ban because the Establishment Clause does not allow it.

15. What Was The Real Purpose Behind The Original Gay Marriage Bans?



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What Was The Real Purpose Behind The Original Gay Marriage Ba...

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The original legal basis behind State's bans on parody marriages rested on the notion that parody marriages erode community standards of decency. The State's Constitution and the Supreme Court of the United States has made it clear that the States have a compelling interest to uphold community standards of decency. Paris Adult Theatre I v. Slaton, 413 US 49 (1973). Courts have held that "any schoolboy knows that a homosexual act is immoral, indecent, lewd, and obscene. Adult persons are even more conscious that this is true." Schlegel v. the United States, 416 F. 2d 1372, 1378 (Ct. Cl. 1969). The Supreme Court has long since held that "to simply adjust the definition of obscenity to social realities has always failed to be persuasive before the Courts of the United States." Ginsberg v. New York, 390 U.S. 629, 639-40, 88 S.Ct. 1274, 20 L.Ed.2d 195 (1968), Mishkin v. State of New York, 383 U.S. 502, 509, 86 S. Ct. 958, 16 L. Ed. 2d 56 (1966), and Bookcase, Inc. v. Broderick, 18 N.Y.2d 71, 271 N.Y.S.2d 947, 951, 218 N.E.2d 668, 671 (1966). Community standards do not evolve but groups of people can become desensitized to objective immorality. While that is a state law argument, what is without question is that all parody marriage policies and sexual orientation discrimination states fail all three prongs of the Lemon test and violate the Establishment Clause in their making and in their enforcement.

EMOTIONAL APPEALS DO NOT USURP THE ESTABLISHMENT CLAUSE

16. Do Emotional Appeals Or Sincerity Of Belief Allow The Government To Usurp The Establishment Clause?



Marriage And Constitution Restoration Act

Do Emotional Appeals Or Sincerity Of Belief Allow The Governme...

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Emotional appeals do not allow the government to usurp the Establishment Clause. When President Obama came into office, he emphasized that he wanted to appoint Judges to the Court who would demonstrate empathy. The entire basis for the Supreme Court in Obergefell to force the government to respect gay marriage policy was predicated on a series of emotional appeals and naked assertions that were implicitly religious in nature. Justices, like Ginsburg and Sotomayor, were moved by the stories of self-identified homosexuals who were dropped off in the middle of nowhere by taxi cab drivers, denied medical treatment, and assaulted, simply because they identified as homosexual. While those stories are tragic, they do not justify the Supreme Court's decision to misuse the Fourteenth Amendment in a manner in which it was never designed. There are other forms of relief already in place for victims who were wronged by taxi drivers, hospitals, and assailants. In Holloman v. Harland, 370 F.3 1252 (11th Cir. 2004), an elementary school teacher required her students to have a moment of silence to start the day. She had really good emotional and pragmatic reasons for doing so. Yet, the Eleventh Circuit found that the moment of silence had a primarily religious purpose. The effect of the Holloman decision was that emotional appeals do not allow government actors to usurp the Establishment Clause. The Windsor and Obergefell Courts allowed emotional and pragmatic

appeals to override the Establishment Clause by pretending that self-identified gay people were a class of people for purposes of the Fourteenth Amendment. Yet, the truth is that self-identified gay people are a part of a denominational sect within the overall religion of Secular Humanism. While there is no such thing as ex-blacks, ex-whites, ex-asians, and ex-hispanics, there are thousands of ex-gays, whose testimony voids the Federal Courts of Subject Matter and Personal Jurisdiction under claims brought by self-identified homosexuals under the Fourteenth and Fifth Amendments. The government cannot respect or recognize the LGBTQ dogma through creating or enforcing policies because the ideology is based on a series of unproven faith-based assumptions and naked assertions that are implicitly religious in nature.

17. What Is Preemption Doctrine And Why Does It Matter?



Marriage And Constitution Restoration Act

What Is Preemption Doctrine And Why Does It Matter?

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If a state policy conflicts with Federal law, the Federal law must be obeyed. If a Federal law or state law conflicts with the United States Constitution's amendments, the United States Constitution wins out.

18. Why Can't The States Limit Marriage To Two Consenting People?



Marriage And Constitution Restoration Act

Why Can't The State Limit Marriage To Two Consenting People?

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The Establishment Clause of the First Amendment of the United States Constitution prohibits all of the States from limiting marriage to two consenting adults. It is an arbitrary law state consideration that is undone by the holding in Obergefell and the Fourteenth Amendment if Obergefell was not a sham. Since the Supreme Court pretended that marriage is an "existing right," "individual right," and "fundamental right" based on a "personal choice" for self-identified homosexuals under the Fourteenth Amendment, then it follows that marriage must be an "existing right," "individual right," and "fundamental right" based on a personal choice for self-identified polygamists, zoophiles, and objectophiles as well under the Fourteenth Amendment. Zablocki v. Redhail, 434 U.S. 374, 384 (1978) (fundamental right); Cleveland Bd. of Educ. v. LaFleur, 414 U.S. 632, 63940 (1974) (personal choice); Loving v. Virginia, 388 U.S. 1, 12 (1967) (existing right/individual right); Lawrence v. Texas, 539 U.S. 558 (2003) (intimate choice). Otherwise, gay marriage plight is just a sham that is really barred by the Establishment Clause. The bottom line is that the Secular Humanists on the court are guilty of monkeying with the Fourteenth Amendment in a manner that makes Secular Humanists judges an internalized threat to American Democracy.

The attempt by the blue states to limit marriage to two people is merely another arbitrary marriage ban that violates the Fourteenth Amendment if the Obergefell decision was valid. But it was not. The First Amendment has exclusive jurisdiction in informing the states how to respond to all marriage requests that do not involve one man and one woman and how to respond to self-asserted sex-based identity narratives that are questionably real, moral, and decent.

19. Does the Marriage And Constitution Restoration Act single out gay marriage?



Marriage And Constitution Restoration Act

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Does the Marriage And Constitution Restoration Act single out ga...

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There are some bills that single out the LGBTQ community or gay marriage. But this is not one of them. This act does not single out self-identified homosexuals or gay marriage. This act bars the State from endorsing, recognizing, respecting, or favoring any form of marriage that does not involve one man and one woman. This act acknowledges that all citizens can have wedding ceremonies of all kinds and live as married people do. It is simply the case that the government is prohibited from being in the parody marriage business.

THE GOVERNMENT WILL CONTINUE TO ENFORCE MAN-WOMAN MARRIAGE POLICIES

20. Are Man-Woman Marriage Policies Unconstitutional Under the Establishment Clause?



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No. Man-woman marriage and man-woman marriage policies are natural, neutral, and non-controversial. Man-woman marriage policies are considered secular and not a sham because they actually accomplish their intended purposes and do not put religion over non-religion. Traditional marriage arose out of the "the nature of things" and did not arise out of a desire to acquire political power and to use government as a tool to show the irresponsible gospel of moral relativism down the throats of our citizens.. See G. Quale, *A History of Marriage Systems* 2 (1988); cf. M. Cicero, *De Officiis* 57 (W. Miller transl. 1913). Obergefell at 5 (Roberts Dissent). Roberts in his dissent in Obergefell also stated: "In his first American dictionary, Noah Webster defined marriage as "the legal union of a man and woman for life," which served the purposes of "preventing the promiscuous intercourse of the sexes... promoting domestic felicity, and... securing the maintenance and education of children." 1 *An American Dictionary of the English Language* (1828).

21. Why Is It A Bad Idea For The States To Completely Get Out Of The Marriage Business?



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Why Is It A Bad Idea For The States To Completely Get Out Of The...

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In the wake of the Obergefell and Windsor “judicial push,” there has been a push by many well-intended Republican lawmakers to get out of the marriage business altogether. However, for the government to pull out of marriage altogether would be a terrible idea because it would have terrible secondary effects. The government has a compelling interest to make divorce difficult for the sake of children and the public’s health. A man and woman in a marriage are different biologically but inherently equal, possessing corresponding sexual parts that when coalesced have the prospective procreative potential to create life itself. The offspring of those unions are subject to having input from a male and female with whom they share the same genetic code. The offspring of those unions have a readily identifiable and unbroken ancestral chain, making that specific relationship factually and legally distinct from all other prospective parody forms of marriage and the only “secular” form of marriage for purposes of the Establishment Clause.

The Establishment Clause allows the government to continue to legally respect and enforce man-woman marriage policy because the policies are neutral, natural, non-controversial, and secular in nature. No reasonable person thinks that man-woman marriage is immoral but there are millions of people who believe that all forms of parody marriage are. County Clerks, like Kim Davis, is not going to jail in protest because the counties are issuing man-woman marriage licenses. But there are millions of taxpayers who object to the government using tax dollars to finance a constellation of benefits that flow out of the coffers of the government’s general fund to finance parody marriages. These Americans believe that to condone and act of immorality is itself an act of immorality, and they do not want their tax dollars used to endorse any form of parody marriage because they do not want to themselves be guilty of enabling immorality. When the government issues man-woman marriage licenses, it does not put “religion over non-religion.” But when the government issues parody marriage licenses and enforces sexual orientation discrimination statutes, it has the effect of putting religion over non-religion in a manner that is extremely coercive. Just as government officials may not favor or endorse one religion over others, so to officials “may not favor or endorse religion generally over non-religion.” *Lee v. Weissman*, 505 U.S. 577, 627, 112 S.Ct. 2649, 120 L.Ed.2d 467 (1992)(Souter, Justice, concurring)(citing *County of Allegheny v. ACLU*, 492 U.S. 573, 589-94, 109 S.Ct. 3086, 106 L.Ed.2d 472 (1989)). Man-woman marriage is special. It is standalone and set apart.

22. What Set Of Moral Doctrine Can The States Rely On In Making Laws?



Marriage And Constitution Restoration Act

What Set Of Moral Doctrine Can The States Rely On In Making La...

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At some point the Government is going to have to come to terms with the fact that “without faith,” there is no basis for “morality,” and “without morality” there is no basis for “law” and there is no way around that axiom. Basically, what happened in *Obergefell v. Hodges*, 135 S. Ct. 2584 (2015) was that the self-identified homosexual litigants imperialistically proclaimed that “nobody’s version of morality as a basis for law matters except the one we believe in.” For moral relativists to suggest that “no one set of moral doctrine as a basis for law matters” is itself a “moral doctrine as a basis for law” that suggests “that it matters above all.” Such an assertion is simply an imperialistic power play and a way of coming out on top in a policy debate. In his letters from a Birmingham jail, Dr. King wrote that the reason he knew that a law was unjust was that it violated a “higher law” or a “divine law.” Objective morality obviously exists or there is no basis for justice. If a junior officer in the Military is required to disobey orders that are objectively immoral from commanders all the way up to the President under the Uniform Code of Military Justice (UCMJ), then very obviously “morality” as a basis of law matters in the “civil sector” as well when it comes to policymaking. See (UCMJ) 809.ART.90 (20); *Armbruster v. Cavanaugh*, 140 Fed. Appx. 564 (3rd Cir. 2011). In fact, the Constitution’s version of (UCMJ) 809.ART.90 (20) is Article VI. The question presented is which set of moral doctrine can be relied on by Military officers and lawmakers that accords with Constitutional and transcultural justice? The answer is this: “the set of moral doctrine that parallels self-evident truth can only be used as the exclusive foundational basis for law in the United States in the promulgation of policy to survive any level of Constitutional Scrutiny.” “America is [not officially] a Christian Nation” as the Supreme Court conclusively found in *Church of the Holy Trinity v. the United States*, 143 U.S. 457 (1892). America is not officially a Christian Nation because it would produce the very legalism that Christ, himself, was so opposed to. However, “America is [certainly not] a [Savage Nation]” as Justice Ginsburg believes. Justice Kennedy, a devout Secular Humanist, attempted to enshrine when he asserted in *Planned Parenthood of Southeastern Pa. v. Casey*, 505 U.S.

833, 847 48 (1992) that "at the heart of liberty is the right to define one's own concept of existence, of meaning, of the universe." Justice Kennedy's worldview amounts to the German Proverb, "Jedem das Seine," which means "to each his own," which was of course what the sign over Buchenwald concentration camp read. It can be said, however, that "America is [unofficially] a Christian Nation" insofar as laws that based on a self-evident truth that happens to parallel the New Testament Gospel does not make those laws automatically invalid in view of the Establishment Clause. The Master Narrative of the Constitution and the bill of Rights is unequivocally the personalized and radically transformative truth of the New Testament gospel narrative. Just because the Constitution reflects the truth claims of Christianity does mean that the Constitution is unconstitutional. The moral basis for the Fourteenth Amendment that was the source of the civil rights movement led by Dr. Martin Luther King Jr comes straight out of Genesis that all men are created equal and entitled to equal protection under the law. While the government cannot mandate a national religion, the government can only base laws that reflect self-evident morality from the objectively reasonable observer standpoint.

LEGISLATIVE HISTORY DOCS

[CLICK HERE TO DOWNLOAD ALL OF THE DOCUMENTS TO BE FILED WITH THE BILL TO BE PART OF THE LEGISLATIVE HISTORY](#)

AMICUS BRIEFS

[Amicus Brief by the National Alliance of Black Pastors \(pdf\)](#)



[Amicus Brief by the Coalition of Doctors Defending Reparative Therapy \(pdf\)](#)



[Amicus Brief by the Center for Garden State Families \(pdf\)](#)



[Website](#)

[Amicus brief by American Family Association of PA \(pdf\)](#)



[Website](#)

MEDICAL PROFESSIONALS TESTIFYING THERE IS NO GAY GENE

(Testifying based on their expertise that sexual orientation has nothing to do with immutability or genetics and is a religious mythology and dogma).

[Affidavit of ex-gay Dr. Tara King LPC, EdM, MA, LCADC, the Director of King of Hearts \(pdf\)](#)

[Affidavit of Dr. Michelle Cretella MD, FCP President of the College of the College of Pediatricians \(pdf\)](#)

Dr. Tara King, Ex-Lesbian and Executive Director King of H...



Dr. Michelle Cretella Exposes How Transgenderism Harm...



[Website](#)

EX-GAY ACTIVISTS TESTIFYING THE LGBTQ COMMUNITY IS A DENOMINATION WITH THE CHURCH OF SECULAR HUMANISM

(Testifying there is no gay gene and homosexuality is a religion that is inseparably linked to the religion of Secular Humanism)

[Affidavit of Reverend Cothran \(pdf\)](#)

[Affidavit of Reverend Joan Grace Harley ex-transgender \(pdf\)](#)

Charlene Cothran - Gay Activist Finds Christ

Grace Harley's Story



Website



Affidavit of Robin Goodspeed (pdf)

Affidavit of Greg Quinlan (pdf)



Website



Article Voice of the Voiceless

PERSECUTED CHRISTIANS – TESTIFYING THE GOVERNMENT’S ENDORSEMENT OF LGBTQ IDEOLOGY HAS CREATED SUFFERING AND INTOLERANCE AND IS A SHAM

Affidavit of Lisa Boucher Co-owner of WW Bridal (pdf)

Affidavit of Pastor Rich Penkoski (pdf)



Christian Post Article



Christian Post Article

Affidavit of Joshua Busby – founder of Christian Resistance

LICENSED MINISTERS – TESTIFYING THAT SEXUAL ORIENTATION IS A RELIGIOUS DOGMA THAT IS INSEPARABLY LINKED TO THE RELIGION OF SECULAR HUMANISM

Affidavit of Pastor Dominick Cuzzo

Affidavit of Pastor Lane Farr – Senior Pastor of AGM Church “A Generation Movement”



Affidavit of Pastor Jack Cairns BA. MA. M.DIV Senior Pastor of Capital Assembly Of God



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MARRIAGE AND CONSTITUTION RESTORATION ACT

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