Cause No. 23-0697

In the Supreme Court of Texas

THE STATE OF TEXAS; OFFICE OF THE ATTORNEY GENERAL; KEN PAXTON, IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL OF TEXAS; THE TEXAS MEDICAL BOARD; AND THE TEXAS HEALTH AND HUMAN SERVICES COMMISSION,

Appellants,

v.

LAZARO LOE, ET AL.,

Appellees.

On Direct Appeal from the 201st Judicial District Court, Travis County

Brief for the Family Freedom Project as *Amicus Curiae*

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INTEREST OF AMICUS CURIAE

Amicus Curiae is Family Freedom Project (FFP), a registered assumed name of the Texas Home School Coalition, which is a nonprofit organization committed to preserving the fundamental rights of parents to raise their children without unwarranted and unnecessary interference by the government or other nonparents.

FFP does extensive work in the courts and the Texas legislature to protect the constitutional rights of Texas parents to raise their children. FFP has been instrumental in the passage of numerous bills in the Texas legislature to rein in the state's power to interfere in the parent-child relationship through Child Protective Services. Additionally, FFP routinely works on legislation that would affect the right and responsibility of parents to raise their children in the areas of family law, healthcare, education, and criminal law.

Similarly, FFP works to protect the rights of Texas parents from overreach in the courts. FFP regularly intervenes in cases dealing with complex questions of child welfare and parental rights. Many of these cases have been before this court. FFP works to clarify jurisprudence on questions of parental rights so that families across Texas have equal access to justice through Texas courts regardless of their background or socioeconomic status.

FFP will continue advocating as a friend of the court in significant cases where this Court is asked to explain, interpret, or protect the fundamental liberty interest of parents. This case, which presents an

important question regarding the circumstances under which parental rights may be infringed by the state, is one of those cases.

The Texas Home School Coalition d/b/a Family Freedom Project has retained Chris Branson, Attorney at Law, to file this Amicus Brief defending the constitutional interest of Texas parents and intends to exclusively pay any legal fees and costs associated with the provision of those services.

STATEMENT OF FACTS

FFP adopts Appellant's Statement of Facts for the purpose of this brief.

INTRODUCTION AND SUMMARY OF ARGUMENT

Appellees' fight is not truly with Senate Bill 14 (S.B. 14). Rather, their fight is with nature itself. You can change your mind. You cannot change your body. Yet this is exactly the argument foisted by Appellees—that a decision made with the mind (whether due to mental illness, trauma, or social contagion) is the "true" self and the bodies of children must be modified to match. It is madness. Amicus fully supports the briefs of Appellants, Family Research Council, and Do No Harm detailing the immense harm being inflicted on children of our state and our nation.

Appellees correctly state that parents have a fundamental, constitutional right to raise their children as they see fit. FFP has frequently argued this same point before this Court. However, as this Court has made clear and as FFP has consistently acknowledged in past briefs (from FFP and from its parent organization the Texas Home School Coalition), this right is not without limits. The State has a clear right and duty to protect children from decisions that will jeopardize their health or safety. Genital mutilation and chemical castration of minors are clearly acts that fall within the State's compelling interest to protect children and which the State has a right and even a moral duty to prohibit. If the State cannot interfere here, it cannot legitimately interfere anywhere.

FFP fully supports the State's position that S.B. 14 is constitutionally valid and enforceable. However, FFP holds the position that the legislation, since it infringes on a parent's fundamental, constitutional right to make

medical decisions for his or her child, must pass strict scrutiny. S.B. 14 easily passes this test.

ARGUMENT

I. Parents have a fundamental, constitutional right to make medical decisions for their children. S.B. 14 infringes on that right. Therefore, a review of S.B. 14 requires strict scrutiny.

A. Parental rights are fundamental in nature, protected under the Fourteenth Amendment of the U.S. Constitution, the Texas Constitution, and Texas Supreme Court precedent.

The right of parents to raise their children free from government interference is a fundamental right protected by the Due Process Clause of the Fourteenth Amendment. U.S. CONST. amend. XIV § 1. The right of a fit parent to determine the care, custody, and control of their child is subject to the protections of the Due Process Clause of the Fourteenth Amendment. *Troxel v. Granville*, 530 U.S. 57, 66 (2000). "The liberty interest at issue in this case—the interest of parents in the care, custody, and control of their children—is perhaps the oldest of the fundamental liberty interests recognized by this Court." *Id.* at 65; *see also Pierce v. Society of Sisters*, 268 U.S. 510, 534–35 (1925); *Wisconsin v. Yoder*, 406 U.S. 205, 214 (1972); *Santosky v. Kramer*, 455 U.S. 745, 753 (1982).

Key to the *Troxel* court's holding were findings that (1) the statute afforded no deference to the parent's decision of a child's visitation times with third parties, (2) the parent was not found to be unfit in any way, and (3) the statute provided broad standing for any person to seek visitation with the child for any reason. *Troxel*, 530 U.S. at 67–68. The Court admonished

that "the Due Process Clause does not permit a State to infringe on the fundamental right of parents to make child rearing decisions simply because a state judge believes a 'better' decision could be made." *Id.* at 72–73.

"It is cardinal . . . that the custody, care, and nurture of the child reside first in the parents . . . ." *Prince v. Massachusetts*, 321 U.S. 158, 166 (1994); *see also Quilloin v. Walcott*, 434 U.S. 246, 255 (1978) (citing *id.*). The fundamental right of parents in the companionship, care, custody, and management of his or her children "undeniably warrants deference and, absent a powerful countervailing interest, protection." *Stanley v. Illinois*, 405 U.S. 645, 651 (1972).

Although modern society has to some degree forgotten our Creator and the protections found under natural law, the constitutional provision which reserves to the people the rights not delegated to the government has not. U.S. CONST. amend. X.

The Texas Constitution also provides parents due process rights as to the care, custody, and control of their children:

> The United States Constitution and Texas Constitution provide parents due process rights as to the care, custody, and control of their children. The United States Constitution mandates that no state shall "deprive any person of life, liberty, or property, without due process of law." In Texas, "[n]o citizen of this State shall be deprived of life, liberty, property, privileges or immunities, or in any manner disfranchised, except by the due course of the law of the land." This Court has stated that there is no "meaningful distinction" between due process of the law under the United States Constitution and due course of law under the Texas Constitution. Texas courts have, therefore, traditionally followed federal due process precedent.
> . . . One of the most fundamental liberty interests recognized is the interest of parents in the care, custody, and control of their children.

In re N.G., 577 S.W.3d 230, 234–35 (Tex. 2019) (citations omitted).

Like the U.S. Supreme Court, the Texas Supreme Court has consistently upheld the fundamental, constitutional right of parents to raise their children. As early as 1976, the Texas Supreme Court stated that "[t]he natural right which exists between parents and their children is one of constitutional dimensions." *Wiley v. Spratlan*, 543 S.W.2d 349, 352 (Tex. 1976). "As the *Troxel* plurality stated, '[I]t is cardinal . . . that the custody, care and nurture of the child reside first in the parents.'" *In re Derzapf*, 219 S.W.3d 327, 334 (Tex. 2007). "Parents enjoy a fundamental right to make decisions concerning 'the care, custody, and control of their children.'" *In re Chambless*, 257 S.W.3d 698, 700 (Tex. 2008).

The Texas Supreme Court has upheld the fundamental right of parents many times. *E.g. In re M.S.*, 115 S.W.3d 534, 548 (Tex. 2003) (discussing "the parent's fundamental liberty interest in maintaining custody and control of his or her child"); *In re Mays-Hooper*, 189 S.W.3d 777, 778 (Tex. 2006) (quoting *Troxel*, 530 U.S. at 68 ("[S]o long as a parent adequately cares for his or her children (i.e., is fit), there will normally be no reason for the State to inject itself into the private realm of the family . . . .")); *In re Scheller*, 325 S.W.3d 640, 644 ("Parental control and autonomy is a 'fundamental liberty interest.'" (quoting *Derzapf*, 219 S.W.3d at 335)); *In re H.S.*, 550 S.W.3d 151, 161 (Tex. 2018) (commenting on "the fundamental right of parents to make child rearing decisions" (quoting *Troxel*, 530 U.S. at 72–73)). The rights of a parent go deeper even than government:

> God, in his wisdom, has placed upon the father and mother the obligation to nurture, educate, protect, and guide their offspring, and has qualified them to discharge those important duties by writing in their hearts sentiments of affection and establishing between them and their children ties which can not exist between the children and any other persons.

State v. Deaton, 93 Tex. 243, 247 (Tex. 1900).

B. The fundamental right of parents to direct the care, control, custody, and nurture of their children includes the right to make medical decisions.

The United States Supreme Court has made clear that the list of parental rights includes the right to make medical decisions for their children:

> Our cases have consistently followed this course; our constitutional system long ago rejected any notion that a child is "the mere creature of the State" and, on the contrary, asserted that parents generally "have the right, coupled with the high duty, to recognize and prepare [their children] for additional obligations." Surely, this includes a "high duty" to recognize symptoms of illness and to seek and follow medical advice.

Parham v. J. R., 442 U.S. 584, 602 (1979) (citations omitted).

The Texas Supreme Court has recognized the authority of parents to make treatment decisions for their children:

> The Texas Legislature has likewise recognized that parents are presumed to be appropriate decision-makers, giving parents the right to consent to their infant's medical care and surgical treatment. A logical corollary of that right, as the court of appeals here recognized, is that parents have the right not to consent to certain medical care for their infant, *i.e.*, parents have the right to refuse certain medical care.

Miller ex rel. Miller v. HCA, Inc., 118 S.W.3d 758, 766 (Tex. 2003) (footnote omitted) (referring to TEX. FAM. CODE ANN. § 151.001(a)(6) ("A parent of a child has . . . the right to consent to the child's marriage, enlistment in the

armed forces of the United States, medical and dental care, and psychiatric, psychological, and surgical treatment; . . . .").

Appellants argue that there is no right recognized by the federal courts to the specific medical treatments banned by S.B. 14. *See* Appellants' Br. 25. However, the right of parents to make medical decisions for their children is not just the right regarding this procedure or that prescription. It is much more encompassing than that. It is the right to decide whether to obtain or refuse *any* medical treatment for their children.

C. State interference with the fundamental rights of parents is subject to strict scrutiny.

Courts generally apply strict scrutiny if a state statute infringes upon a fundamental liberty interest protected under the Due Process Clause of the Fourteenth Amendment. *See Reno v. Flores*, 507 U.S. 292, 302 (1993). Parents are entrusted by God and the state with broad authority over their children. But parents are not gods. With that authority comes responsibility. Parents' authority over their children is not plenary—it is subject to critical limitations when it inflicts significant harm on a child. It is at this stage that the state must intervene for the sake of the child. To decipher the proper balance between a parent's authority and the state's duty to protect children from harm, longstanding jurisprudence from the U.S. Supreme Court holds that the proper standard of review is strict scrutiny. *See id.*; *see also Troxel*, 530 U.S. at 80 (Thomas, J., concurring) (noting that strict scrutiny is the

appropriate standard for reviewing the infringement of fundamental rights such as the parental right to direct a child's upbringing).

Application of this standard prevents any infringement of fundamental rights "unless the infringement is narrowly tailored to serve a compelling state interest." *Reno*, 507 U.S. at 301–02 (1993); *see also Washington v. Glucksberg*, 521 U.S. 702, 721 (1997) (noting that the Fourteenth Amendment of the U.S. Constitution forbids the government from infringing on fundamental liberty interests *at all*, no matter what process is provided, unless the infringement is narrowly tailored to serve a compelling state interest).

As with court decisions, any legislation that infringes on parents' right to consent to or refuse medical care is subject to strict scrutiny. Most statutes are subject only to rational-basis review. However, certain subject matters—including parental rights—elevate that scrutiny:

> The general rule is that legislation is presumed to be valid and will be sustained if the classification drawn by the statute is rationally related to a legitimate state interest. . . .
> The general rule gives way, however, when a statute classifies by race, alienage, or national origin. These factors are so seldom relevant to the achievement of any legitimate state interest that laws grounded in such considerations are deemed to reflect prejudice and antipathy—a view that those in the burdened class are not as worthy or deserving as others. For these reasons and because such discrimination is unlikely to be soon rectified by legislative means, these laws are subjected to strict scrutiny and will be sustained only if they are suitably tailored to serve a compelling state interest. *Similar oversight by the courts is due when state laws impinge on personal rights protected by the Constitution.*

Cleburne v. Cleburne Living Ctr., Inc., 473 U.S. 432, 440 (1985) (emphasis added) (citations omitted).

Parental rights are, without question, one of the personal rights protected by the Constitution. "This natural parental right has been characterized as "essential," "a basic civil right of man," and "far more precious than property rights." *Holick v. Smith*, 685 S.W.2d 18, 20 (Tex. 1985) (quoting *Stanley v. Illinois*, 405 U.S. 645, 651 (1972)). "It is axiomatic that parental rights are personal rights and are not fungible." *In re S.F.*, 2022 IL App (2d) 210577, ¶ 34.

Any intervention by the State into the parent-child relationship is fraught with peril, for it is presumed that the interests of the child and the parent will normally align. *Santosky v. Kramer*, 455 U.S. 745, 753 (1982) ("At the factfinding, the State cannot presume that a child and his parents are adversaries."). Yet, it is sometimes necessary to protect children from significant harm. A strict scrutiny analysis provides a method by which courts can effectively analyze the validity of any such intervention.

Appellants correctly assert that parents' rights to the custody and care of their children do not include the right to act in a manner injurious to their children. *See* Appellants' Br. 25. This fact leads Appellants to conclude that S.B. 14's prohibition lies beyond the scope of parental authority and thus does not impact that right. *See id.* at 20 ("Parental rights do not create an exemption from otherwise-applicable regulation of the medical profession . . . ."). FFP respectfully disagrees with this analysis. Rather than lie beyond parental rights, S.B. 14 necessarily and correctly *limits* parental authority. But being a limit on parental authority, S.B. 14 must undergo strict scrutiny—which it easily survives.

II. S.B. 14 survives strict scrutiny because the state has a clear right to protect children from decisions that will jeopardize the health or safety of the child.

The right of parents to raise their children without state interference, like any legal right, is not absolute in every circumstance. "To be sure, the power of the parent, even when linked to a free exercise claim, may be subject to limitation under *Prince* if it appears that parental decisions will jeopardize the health or safety of the child, or have a potential for significant social burdens." *Wisconsin v. Yoder*, 406 U.S. 205, 233–34 (1972). "[W]e have recognized that a state is not without constitutional control over parental discretion in dealing with children when their physical or mental health is jeopardized." *Parham v. J. R.*, 442 U.S. 584, 603 (1979).

It is imperative to note that this limitation on parental discretion focuses on the *outcome* of the parent's decision—not on the parents' *intent*. No one here believes that any loving parents intend harm when consenting to puberty blockers that wreak havoc on their child's developing body or when they consent to the physical mutilation of that child. Rather, parents are deceived into believing that consent is necessary for the children to be their "true selves." *See* Pls.' Verified Original Pet. Declaratory J. and Appl. Temporary and Permanent Injunctive Relief 2. Worse, they are often given the cruelly false choice of a "happy daughter or a dead son."[1]

[1] Hope Reese, *Embracing a Child When They Come Out as Transgender Can Be a Matter of Life and Death*, VOX, https://www.vox.com/conversations/2018/3/8/17096462/sarah-mcbride-trans-youth-activist-military-ban (Mar. 9, 2018, 9:22 AM).

A law that is subject to strict scrutiny must be "narrowly tailored to serve a compelling state interest." *Reno v. Flores*, 507 U.S. 292, 302 (1993). The State of Texas has passed the strict scrutiny test with S.B. 14.

A. S.B. 14 serves a compelling state interest.

Protecting children from serious harm is an interest compelling enough to survive strict scrutiny. *See Packingham v. North Carolina*, 582 U.S. 98, 111 (2017) (quoting *Globe Newspaper Co. v. Superior Ct.*, 457 U.S. 596, 607 (1982) (explaining that the state has a compelling interest in "safeguarding the physical and psychological well-being of a minor")). "The State has a right and a duty to protect and nurture its minor children." *State v. Corpus Christi People's Baptist Church, Inc.*, 683 S.W.2d 692, 696 (Tex. 1985) (citing *Prince v. Massachusetts*, 321 U.S. 158 (1944); *Jones v. Alexander*, 59 S.W.2d 1080 (1933)). The decisional responsibility of parents is subject to review in exceptional circumstances. *See Bowen v. Am. Hosp. Ass'n*, 476 U.S. 610, 627 (1986). The State "may . . . supervene parental decisions before they become operative to ensure that the choices made are not so detrimental to a child's interests *as to amount to* neglect and abuse." *Id.* at 628 n.13 (1986) (emphasis added) (quoting PRESIDENT'S COMM'N FOR THE STUDY OF ETHICAL PROBS. IN MED. AND BIOMEDICAL AND BEHAV. RSCH., DECIDING TO FOREGO LIFE-SUSTAINING TREATMENT: A REPORT ON THE ETHICAL, MEDICAL, AND LEGAL ISSUES IN TREATMENT DECISIONS 212–13 (1983)). As stated above, no one is alleging that parents are intentionally setting out to harm their children. Rather, these parents have fallen victim to charlatan professionals who advocate for actions that *amount to* neglect and abuse.

The State of Texas has a compelling interest in protecting children within its border from experimental, irreversible chemical castration and the mutilation/removal of healthy body parts. S.B. 14 bans a ghastly, barbaric *physical* "solution" to a serious and legitimate *mental* disorder (gender dysphoria). Whatever a parent's intentions may be—and no matter how they may have been coerced or lied to by activists—the fact remains that after all of the chemicals and surgeries, the children are the ones who suffer the irreversible damage. This damage is something that the state clearly has a compelling interest in preventing. Texas joins eleven other states, Norway, Sweden, and the U.K. which have either banned or severely limited these practices.[2]

Appellants make an exemplary argument for the compelling interest that S.B. 14 addresses, including how "[t]he prohibited medical procedures subject children to potentially life-altering side effects, including infertility, sexual dysfunction, erythrocytosis, diminishing bone density, and damage to psychosocial development." *See* Appellants' Br. 32.[3] The devastating harm visited upon children through these procedures is hardly surprising, given the unspeakably shoddy and ideologically motivated medical "protocols"

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[2] Joshua Cohen, *Increasing Number of European Nations Adopt a More Cautious Approach to Gender-Affirming Care Among Minors*, FORBES (June 6, 2023, 7:28 PM), https://www.forbes.com/sites/joshuacohen/2023/06/06/increasing-number-of-european-nations-adopt-a-more-cautious-approach-to-gender-affirming-care-among-minors/?sh=53f51c7d7efb.

[3] Appellants argue for a rational basis test—which FFP opposes in favor of strict scrutiny—but also recognizes that S.B. 14 meets a compelling interest of the State. *Id*. at 31.

involved, which were outlined extensively in the amicus curiae briefs submitted to this court by the Family Research Council and Do No Harm.

In short, it is beyond reasonable debate that the State has a compelling interest—indeed, a compelling *duty*—to protect children from the gruesome and life-altering consequences of these experimental drugs and surgeries. For this reason, S.B. 14 survives this prong of the strict scrutiny test.

B. S.B. 14 is narrowly tailored to serve the state's compelling interest.

When a fundamental right is implicated, like the right of parents to raise their children, a statute will be upheld only if it is narrowly tailored to serve a compelling state interest. *In re Pensom*, 126 S.W.3d 251, 254 (Tex. App.—San Antonio 2003, no pet.). "A statute is narrowly tailored if it targets and eliminates no more than the exact source of the 'evil' it seeks to remedy." *Frisby v. Schultz*, 487 U.S. 474, 485 (1988) (citation omitted). Even a complete ban can be narrowly tailored if each activity within the proscription's scope is an appropriately targeted evil. *Id.*

S.B. 14 is nowhere near a complete ban. The statute's authors were meticulous in proscribing only those activities which amount to neglect and abuse. *Compare Bowen*, 476 U.S. at 628 n.13 (quoting PRESIDENT'S COMM'N FOR THE STUDY OF ETHICAL PROBS. IN MED. & BIOMEDICAL & BEHAV. RSCH., *supra*, at 212–13) (explaining that the state has an interest in protecting children from activities that amount to abuse or neglect), *with* TEX. HEALTH & SAFETY CODE ANN. §§ 161.702–.703 (listing specific, enumerated prohibited activities). Appellants, in their brief, offered overwhelming

evidence, including expert testimony, that S.B. 14 serves a compelling state interest "by preventing vulnerable young people from being pressured into agreeing to unproven, irreversible medical interventions which might actually exacerbate their feelings of emotional distress and prolong their gender dysphoria." *See* Appellants' Br. 32. S.B. 14 protects only minor children and even provides a period of time during which children who were already taking the now-prohibited harmful treatments may transition off them in a safe manner. S.B. 14 has no effect on adult citizens of Texas.

Appellees' assertion that S.B. 14 was passed "because of, not in spite of, its impact on trangender adolescents," is dishonest and offensive. *See* Pls.' Pet. 4. Rather, S.B. 14 is designed to protect only vulnerable children who are too young to legally consent or fully understand the devastating consequences of the treatment being foisted upon them.

As such, S.B. 14 is clearly a narrowly tailored solution to a devastating harm which the state has a compelling interest in preventing. Therefore, S.B. 14 passes the strict scrutiny test.

CONCLUSION AND PRAYER FOR RELIEF

Since S.B. 14 infringes on the fundamental right—found in both the U.S. and Texas Constitutions—of parents to raise their children without state interference, it must pass strict scrutiny. This legislation does, in fact, serve a compelling state interest and is narrowly tailored to serve that interest. It survives strict scrutiny with ease.

The Family Freedom Project respectfully prays that this Court, using an explicit strict scrutiny analysis, vacate the temporary injunction, reverse the judgment of the district court denying Appellees' plea to the jurisdiction, and render judgment dismissing all claims.

Respectfully submitted,

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I certify that this document complies with TEX. R. APP. P. 9. It contains 3,616 words, as determined by the computer software's word count function, excluding the sections of the brief exempted by TEX. R. APP. P. 9.4(i)(1) and is proportionally spaced using Georgia Pro, 14 point font.

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The undersigned hereby certifies that a true and correct copy of the foregoing document was delivered to each party and/or their respective attorney of record on or before January 12, 2024, via electronic service in accordance with TEX. R. APP. P. 9.5.

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