

No. 24-539

IN THE SUPREME COURT OF THE UNITED STATES

KALEY CHILES, PETITIONER

v.

PATTY SALAZAR, IN HER OFFICIAL CAPACITY AS
EXECUTIVE DIRECTOR OF THE COLORADO DEPARTMENT
OF REGULATORY AGENCIES, ET AL.

CERTIFICATE OF SERVICE

It is hereby certified that all parties required to be served have been served with copies of the **BRIEF FOR THE UNITED STATES AS AMICUS CURIAE SUPPORTING PETITIONER**, via email and first-class mail, postage prepaid, this 12th day of June 2025.

[See Attached Service List]

As required by Supreme Court Rule 33.1(h), I certify that the document contains **9,000** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed on **June 12, 2025**.

D. John Sauer
Solicitor General
Counsel of Record
Department of Justice
Washington, D.C. 20530-0001
(202) 514-2217

June 12, 2025

Due to the continuing delay in receiving incoming mail at the Department of Justice, in addition to mailing your brief via first-class mail, we would appreciate a fax or email copy of your brief. If that is acceptable to you, please fax your brief to Charlene Goodwin, Supervisor, Case Management, Office of the Solicitor General, at (202) 514-8844, or email at **SupremeCtBriefs@USDOJ.gov**. Ms. Goodwin's phone number is (202) 514-2217 or 2218. Thank you for your consideration of this request.

24-0539

CHILES, KALEY

PATTY SALAZAR, EXECUTIVE DIRECTOR OF THE
CO. DEPT OF REGULATORY AGENCIES, ET AL.

JON BRADLEY BERGFORD
ILLUMINE LEGAL LLC
8550 E. TUFTS AVENUE
SUITE 1350
DENVER, CO 80237
303-228-2241
BRAD@LAWILLUMINE.COM

KRISTINE LEE BROWN
ATTORNEY AT LAW
8700 E JEFFERSON AVE. #370953
DENVER, CO 80237
720-285-9552
KRISTI@KRISTIBURTONBROWN.COM

JOHN J. BURSCH
ALLIANCE DEFENDING FREEDOM
440 FIRST STREET, NW
SUITE 600
WASHINGTON, DC 20001
616-450-4235
JBURSCH@ADFLEGAL.ORG

VIA EMAIL

JAMES A. CAMPBELL
ALLIANCE DEFENDING FREEDOM
44180 RIVERSIDE PKWY.
LANSDOWNE, VA 20176
571-707-4655
JCAMPBELL@ADFLEGAL.ORG

VIA EMAIL

FREDERICK W. CLAYBROOK, JR.
CLAYBROOK LLC
655 15TH ST., NW, STE. 425
WASHINGTON, DC 20005
301-622-0360
RICK@CLAYBROOKLAW.COM

CYNTHIA FLEMING CRAWFORD
AMERICANS FOR PROSPERITY FOUNDATION
4201 WILSON BLVD.
SUITE 1000
ARLINGTON, VA 22203
571-329-2227
CCRAWFORD@AFPHQ.ORG

DAVID ANTHONY DALIA
DAVID A. DALIA
700 CAMP STREET
NEW ORLEANS, LA 70130
504-524-5541
DAVIDADALIA@GMAIL.COM

DEBORAH J. DEWART
111 MAGNOLIA LANE
HUBERT, NC 28539
910-326-4554
LAWYERDEBORAH@OUTLOOK.COM

JOHN ALLEN EIDSMOE
FOUNDATION FOR MORAL LAW
P.O. BOX 148
GALLANT, AL 35972
334-262-1245
EIDSMOEJA@JUNO.COM

RANDOLPH SCOTT ELF
POST OFFICE BOX 525
LAKEWOOD, NY 14750
202-423-2122
FOREFILINGONLY@GMAIL.COM

MICHAEL P. FARRIS
NATIONAL RELIGIOUS BROADCASTERS
20 F STREET
SEVENTH FLOOR
WASHINGTON, DC, DC 20001
202-341-4783
MFARRIS@NRB.ORG

MICHAEL LEE FRANCISCO
FIRST & FOURTEENTH PLLC
800 CONNECTICUT AVENUE
SUITE 300
WASHINGTON , DC 20006
202-998-1978
MICHAEL@FIRST-FOURTEENTH.COM

SEAN PAUL GATES
CHARIS LEX P.C.
155 N. LAKE AVE.,
STE. 800
PASADENA, CA 91101
626-508-1715
SGATES@CHARISLEX.COM

SCOTT WILLIAM GAYLORD
HIGH POINT UNIVERSITY SCHOOL OF LAW
ONE UNIVERSITY PARKWAY
HIGH PINT, NC 27268
336-841-2635
SGAYLORD@HIGHPOINT.EDU

SAMUEL BRACKEN GEDGE
INSTITUTE FOR JUSTICE
901 N. GLEBE ROAD,
SUITE 900
ARLINGTON, VA 22203
SGEDGE@IJ.ORG

RICHARD SHAWN GUNNARSON
KIRTON MCCONKIE
KEY BANK TOWER
36 SOUTH STATE STREET
SUITE 1900
SALT LAKE CITY, UT 84111
801-328-3600
SGUNNARSON@KMCLAW.COM

JACOB H. HUEBERT
LIBERTY JUSTICE CENTER
7500 RIALTO BLVD.
SUITE 1-250
AUSTIN, TX 78735
512-481-4400
JHUEBERT@LJC.ORG

CHRISTOPHER E. MILLS
SPERO LAW LLC
557 EAST BAY STREET
#22251
CHARLESTON, SC 29413
8436060640
CMILLS@SPERO.LAW

KERRY LEE MORGAN
PENTIUK, COUVREUE & KOBILJAK, P.C
2915 BIDDLE AVE.
STE. 200
WYANDOTTE, MI 48192
734-281-7100
KMORGAN@PCK-LAW.COM

MICHAEL STEVEN OVERING
LAW OFFICES OF MICHAEL W. OVERING,
APC
790 E. COLORADO BLVD.
STE. 320
PASADENA, CA 91101
626-564-8600
MOVERING@DIGITALMEDIALAW.COM

DAVID ALAN ROBINSON
DAVID A. ROBINSON, ATTORNEY AT LAW
P.O. BOX 780
NORTH HAVEN, CT 06473
203-214-4078
DAVIDR225@COMCAST.NET

SAMUEL JOSEPH SALARIO
LAWSON HUCK GONZALEZ, PLLC
1700 SOUTH MACDILL AVENUE
SUITE 240
TAMPA, FL 33629
813-765-5113
SAMUEL@LAWSONHUCKGONZALEZ.COM

MATHEW D. STAVES
109 SECOND ST., NE
WASHINGTON, DC 20002

VIA EMAIL

SHANNON WELLS STEVENSON
COLORADO DEPARTMENT OF LAW
1300 BROADWAY
10TH FLOOR
DENVER, CO 80203
720-508-6000
SHANNON.STEVENSON@COAG.GOV

PATRICK STRAWBRIDGE
CONSOVOY MCCARTHY PLLC
1600 WILSON BOULEVARD
SUITE 700
ARLINGTON, VA 22209
703-243-9423
PATRICK@CONSOVOYMCCARTHY.COM

JEFFREY MICHAEL TRISSELL
LIMANDRI & JONNA LLP
P.O. BOX 912
RANCO SANTA FE, CA 92067
858-759-9930
JTRISSELL@LIMANDRI.COM

EUGENE VOLOKH
HOOVER INSTITUTION STANFORD
UNIVERSITY
434 GALVEZ MALL
STANFORD, CA 94305
650-721-5092
VOLOKH@STANFORD.EDU

WILLIAM WAGNER
GREAT LAKES JUSTICE CENTER
5600 W. MOUNT HOPE HWY.
LANSING, MI 48917-7510
517-643-1765
PROF.WWJD@GMAIL.COM

ERIC HARRIS WESSAN
IOWA ATTORNEY GENERAL'S OFFICE
1305 E. WALNUT STREET
DES MOINES, IA 50319
515-823-9117
ERIC.WESSAN@AG.IOWA.GOV

FRANK J. WRIGHT
LAW OFFICES OF FRANK J. WRIGHT, PLLC
1800 VALLEY VIEW LANE
SUITE 250
FARMERS BRANCH, TX 47523
214-935-9100
FRANK@FJWRIGHT.LAW