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,

Respondents.

On a Writ of Certiorari to the United States Court of Appeals for the Tenth Circuit

BRIEF OF AMICI CURIAE COLOSON CENTER FOR CHRISTIAN WORLDVIEW, FAMILY POLICY ALLIANCE, AND SUMMIT MINISTRIES IN SUPPORT OF PETITIONER

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INTEREST OF AMICI CURIAE[1]

The interests of amici are as follows.

The Colson Center for Christian Worldview exists to build and resource a national and global movement of Christians committed to cultural restoration and to living and defending a Christian worldview. Through its daily and weekly *BreakPoint* commentaries and its Colson Educators program, The Colson Center provides Christians with clarity, confidence, and courage in this unique cultural moment. Its Colson Fellows Program educates and equips believers with a robust Christian worldview so they can thoughtfully engage with the culture, inspire reflection in others, and work effectively toward reshaping the world in light of God's kingdom.

Family Policy Alliance is a Christian ministry with over two decades of experience defending religious freedom and faith-based perspectives in policy and legal advocacy. Family Policy Alliance has been at the forefront of defending Christian counselors' First Amendment rights for over a decade. The organization has actively opposed so-called conversion therapy bans in numerous states and helped elevate the issue to the national stage. Through this sustained advocacy work, Family Policy Alliance has developed deep expertise in the constitutional and professional concerns that arise when government regulations restrict Christian counselors' religious practice.

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[1] No party's counsel authored this brief in whole or in part, and no person or entity other than amici curiae, their counsel, or their members made a monetary contribution intended to fund the brief's preparation or submission.

Summit Ministries is a nonprofit ministry that exists to equip and support rising generations to embrace God's truth and champion a biblical worldview. It hosts two-week summer conferences for over 1,500 high school and college students every year, bringing together prominent Christian speakers and intellectuals to help students navigate fundamental questions about life, Christian faith, and the common good. The publishing division of Summit Ministries offers curriculum and other educational resources to more than 60,000 students each year in Christian schools, homeschools, and churches.

INTRODUCTION

Colorado's counseling censorship law prevents licensed counselors from engaging in talk therapy based on Biblical truth about human sexuality. Unless counselors conform to the State's professed views of sexuality, Colorado bans them from speaking with patients about same-sex attraction or gender identity. Not just counselors are harmed. This heavy-handed government censorship prevents parents and their children from obtaining professional counseling services they desire and need.

This repressive law dramatically restricts the practice of counselors across the State. Religious counselors like Kaley Chiles often serve clients who do not adhere to the state-prescribed sex and gender orthodoxy or who simply have questions about it. In the face of the counseling censorship law, these counselors must refuse to engage with such questions because they cannot help clients pursue goals that run

contrary to Colorado's dictates. Censorship of counseling will prevent young people from receiving the care they critically want and need.

Despite all this, Colorado now questions Chiles's standing to challenge its law. Colorado thereby seeks to avoid the First Amendment by attacking the pre-enforcement nature of this case. Even though Chiles's practice is dramatically restricted and she is left unable to serve a portion of her clientele, the State argues that she has not been injured because she has not yet been prosecuted. Its arguments are meritless. Chiles alleges an intent to engage in speech that violates the counseling censorship law and she easily shows a credible fear of enforcement. That is all this Court requires for standing.

This is a textbook case of why a First Amendment pre-enforcement challenge works to prevent the State from chilling constitutionally protected activity. Though Chiles never enters her counseling relationships with personal goals for the outcome, she wishes to help her clients pursue their own goals, which often include reduction of same-sex attraction and increased comfort with their biological sex. The counseling censorship law prohibits her from helping clients pursue those goals. If she were to violate the law by helping her clients, she would reasonably fear prosecution by the State. Despite ample opportunity, Colorado has steadfastly refused to disavow enforcement against her and the State has a history of vigorous enforcement against religious people. Colorado's arguments to the contrary ignore the plain language of the law, manipulate Chiles's otherwise clear statements, and have failed to find purchase in any of the federal

courts to consider challenges to counseling censorship laws.

Finally, Colorado's censorship not only chills licensed counselors, it also harms religious organizations and minor patients with deeply personal challenges seeking counseling assistance. As amici curiae explain, the Colorado censorship law chills the speech of many religious organizations and churches. Consider how churches and religious organizations are prevented from referring to a licensed counselor minors who need counseling for unwanted sexual or gender identity ideations. In addition, churches and religious institutions face the prospect that Colorado, if not corrected by this Court, will move toward direct regulation of religiously minded speech if the First Amendment does not prevent the State's continued regulation of subjects of deep religious conviction.

ARGUMENT

Chiles has standing to bring a pre-enforcement challenge to Colorado's censorship law. The First Amendment challenge to Colorado's law is critically important for protecting the rights of more than just licensed counselors.

Article III of the Constitution limits the jurisdiction of the federal courts to cases in which the plaintiff has suffered 1) an injury-in-fact; 2) traceable to the conduct complained of; 3) which will likely be redressed by a favorable decision. *See Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560 (1992). Colorado disputes only the first requirement: that Chiles has suffered an injury-in-fact. *See* Br. of Respondents in Opposition to Petition for Writ of Certiorari at 33–35.

When a plaintiff brings, as Chiles has, a pre-enforcement challenge to a statute, she satisfies the injury-in-fact requirement where she alleges "an intention to engage in a course of conduct arguably affected with a constitutional interest, but proscribed by a statute, and there exists a credible threat of prosecution thereunder." *Babbitt v. Farm Workers*, 442 U.S. 289, 298 (1979). Chiles has met both of these requirements and Colorado's arguments to the contrary are undermined by the record.

I. Chiles has pre-enforcement standing to challenge the counseling censorship law.

Chiles's complaint alleges that she intends to engage in a course of conduct proscribed by Colorado's counseling censorship law. It is plain from the face of Chiles's complaint that her practice with clients who seek to reduce same-sex attraction or increase their comfort with their biological sex would run directly afoul of Colorado's prohibitions.

A plaintiff need not violate a law and suffer the attendant sanctions in order to challenge that law in federal court. Indeed, a plaintiff need not violate a statute at all: "it is not necessary that [the plaintiff] first expose himself to actual arrest or prosecution to be entitled to challenge [the] statute that he claims deters the exercise of his constitutional rights." *Babbitt*, 442 U.S. at 298 (quoting *Steffel v. Thompson*, 415 U.S. 452, 459 (1974)). It is enough that the plaintiff allege an intention to engage in speech that is "arguably proscribed by the law." *Susan B. Anthony List v. Driehaus*, 573 U.S. 149, 162 (2014) (internal quotation omitted).

This does not require the plaintiff to allege concrete intent to break the law: "Nothing in this Court's decisions requires a plaintiff who wishes to challenge the constitutionality of a law to confess that he will in fact violate that law." *Susan B. Anthony List*, 573 U.S. at 163. To the contrary, in its two major pre-enforcement standing cases, this Court twice found standing where the plaintiff specifically disclaimed an intent to break the law.

In *Babbit*, the Court considered a law banning the promotion of agricultural boycotts "by the use of dishonest, untruthful and deceptive publicity." 442 U.S. at 301. The plaintiffs there confessed that they "[did] not plan to propagate untruths" but argued that "erroneous statement is inevitable in free debate" *Id.* Despite plaintiffs' insistence that they did not intend to break the law, the Court found standing because the plaintiffs were "not without some reason" in fearing prosecution for violation of the ban. *Id.* at 302. Likewise, in *Susan B. Anthony List*, a plaintiff challenging a ban on certain false statements was found to have standing despite its insistence that its statements were true. The Court found standing because the State previously brought enforcement proceedings based on true statements and could do so in the future. *Susan B. Anthony List*, 573 U.S. at 163.

Rather than confessing a concrete intention to break the law, a plaintiff need only allege an intention to speak in an "arguably" illegal way. *Susan B. Anthony List*, 573 U.S. at 162. The word "arguably" does real work in this standard; plaintiffs do not bear the burden of proving that their conduct would actually violate the statute. "[S]tanding in no way depends on the merits of the plaintiff's contention that particular

conduct is illegal." *Warth v. Seldin*, 422 U.S. 490, 500 (1975); *see also Meese v. Keene*, 481 U.S. 465, 473 (1987) ("[W]hether the statute in fact constitutes an abridgement of the plaintiff's freedom of speech is, of course, irrelevant to the standing analysis.") In both *Babbit* and *Susan B. Anthony List,* the Court eschewed a technical examination of each statute's precise scope, instead basing its standing analysis on whether the plaintiff's desired conduct fell within the ambit of the statute such that concerns of illegality were not "wholly speculative." *Babbitt*, 442 U.S. at 302.

It did the same just two years ago when it considered another case out of Colorado, *303 Creative LLC v. Elenis*, 600 U.S. 570 (2023), where Colorado argued that the matter was nonjusticiable because the underdeveloped record did not show violation of the statute or a danger of enforcement. *See* Br. on the Merits for Respondents 23–25, *303 Creative LLC v. Elenis*, 600 U.S. 570 (2023) (No. 21-476). The Court rejected the State's arguments without any analysis other than a description of the plaintiff's arguments before the district court. *See 303 Creative,* 600 U.S. at 580–83. It should do the same here.

A. Chiles has alleged an intent to violate the statute.

Chiles's allegations meet and surpass the bar set in *Babbit* and *Susan B. Anthony List*. Her complaint alleges that she has engaged in and intends to engage in two courses of conduct that would plainly violate the counseling censorship law. First, Chiles has alleged an intent to speak with clients and help them pursue their goals of reducing same-sex attraction and increasing comfort with their biological sex.

The counseling censorship law prohibits Chiles from engaging in any speech that "attempts or purports to change an individual's sexual orientation or gender identity, including efforts to change behaviors or gender expressions or to eliminate or reduce sexual or romantic attraction or feelings toward individuals of the same sex." Colo. Rev. Stat. § 12-245-202(3.5)(a).

In her complaint, Chiles alleges that she "seeks… to assist clients with their stated desires and objectives in counseling which sometime includes clients seeking to reduce or eliminate unwanted sexual attractions, change sexual behaviors, or grow in the experience of harmony with one's physical body." Pet.App. 207a. She further alleges that she has assisted clients with these goals in the past. *Id.*

The complaint goes on to allege that,

> same-sex attractions, behaviors, identity, or a sense that one must change one's physical body as a solution to gender dysphoria are (a) sometimes an experience over which the client has anxiety or distress, and (b) the client seeks to eliminate that anxiety or distress.

Pet.App. 207a–208a.

Outside of a "confess[ion] that [she] will in fact violate the law," *Susan B. Anthony List*, 573 U.S. at 163, it is difficult to imagine clearer allegations that Chiles intends to speak in a way arguably proscribed by the counseling censorship law. Colorado's law prohibits Chiles from engaging in speech that could be construed as an effort to "change behaviors or gender expressions or to eliminate or reduce sexual or romantic attraction or feelings toward individuals of the same

sex." Colo. Rev. Stat. § 12-245-202(3.5)(a). And Chiles has alleged an intention to help clients who are "seeking to reduce or eliminate unwanted sexual attractions, change sexual behaviors, or grow in the experience of harmony with one's physical body" or seeking to eliminate anxiety or distress from "same-sex attractions, behaviors, identity, or a sense that one must change one's physical body as a solution to gender dysphoria." Pet.App. 207a–208a. Of course, helping someone "reduce or eliminate unwanted sexual attraction" would run afoul of Colorado's prohibition on attempting to "eliminate or reduce sexual or romantic attraction." Colo. Rev. Stat. § 12-245-202(3.5)(a).

Chiles has therefore met the first requirement for standing to challenge the counseling censorship law. She intends to engage in speech to help clients reduce same-sex attraction and increase comfort with their biological sex and such speech is arguably proscribed by the counseling censorship law.

Chiles has further alleged that she intends to confront and challenge clients in a way that could be seen as violating the counseling censorship law. Because the law requires counselors to provide only positive feedback to clients regarding their same-sex attraction or gender identity, Chiles is unable to provide the kind of confrontation and challenge that is required for quality counseling.

The mandate of the counseling censorship law is so broad as to effectively ban any speech that could be seen as casting a negative light on a client's same-sex attraction or gender expression. Counselors are forbidden from "any… efforts to change behaviors or gender expressions," for example. *Id*.

But as Chiles's Complaint explains, asking difficult, even challenging, questions about a client's behavior is an important part of good counseling:

> it is commonly understood that quality counseling that is conducted with unconditional positive regard WILL include clinician stances such as challenge and confrontation in order to assist the client in building their own sense of self that is not dependent upon the counselor's (or anyone else's) approval or affirmation.

Pet.App. 208a. According to Chiles, in order to counsel clients regarding issues of sex and gender, she needs to challenge and confront them. That is to say, when a client is struggling with an issue like anxiety from same-sex attraction, not every statement out of Chiles's mouth will be purely encouraging. Helping clients develop a robust sense of self requires asking challenging questions—questions that the State may interpret as attempting to reduce a client's feelings toward members of the same sex. Whether Colorado would ultimately sanction Chiles for such questions is irrelevant—her speech is "arguably" proscribed. *Susan B. Anthony List*, 573 U.S. at 162 (quoting *Babbit*, 442 U.S. at 303).

Chiles has thus alleged an intent to violate the law twice over. First, by alleging that she intends to help clients who want to "reduce or eliminate unwanted sexual attractions, change sexual behaviors" or eliminate anxiety and distress from "same-sex attractions, behaviors, identity, or a sense that one must change one's physical body as a solution to gender dysphoria." Pet.App. 207a–208a. Second, by alleging an intent to "challenge and confron[t]" clients who are

interested in topics of sexuality and gender. Pet.App. 208a. These allegations more than suffice to show that Chiles intends to engage in speech that arguably violates the counseling censorship law.

Throughout the litigation, Colorado has resisted this conclusion by insisting that Chiles's complaint describes conduct permitted by the counseling censorship law. *See, e.g.,* Response to Petition for Certiorari at 33–35. Bizarrely, Colorado's response to Chiles's Petition for Certiorari claims that the law permits Chiles to help clients "seeking to reduce or eliminate unwanted sexual attractions [and] change sexual behaviors[.]" *Id.* at 35 (alterations in original). But Colorado's law expressly prohibits "efforts to change behaviors or gender expressions or to eliminate or reduce sexual or romantic attraction or feelings." Colo. Rev. Stat. § 12-245-202. Colorado's briefing does not explain how it believes Chiles can help a client "reduce or eliminate unwanted sexual attractions" without "efforts to… eliminate or reduce sexual or romantic attraction."

In the same way, Colorado makes much of Chiles's assertion that she "does not seek to 'cure' clients of same-sex attractions or to 'change' clients' sexual orientation." Pet.App. 207a. But the State refuses to read the rest of that very sentence, which says, "…she seeks only to assist clients with their stated desires and objectives in counseling, which sometimes includes clients seeking to reduce or eliminate unwanted sexual attractions, change sexual behaviors, or grow in the experience of harmony with one's physical body." *Id.*

B. Chiles faces a credible threat of prosecution.

Chiles faces a credible threat of prosecution in light of Colorado's refusal to disavow enforcing the counseling censorship law against her and its history of vigorously enforcing similar laws. Once Chiles has alleged an intent to engage in arguably illegal conduct, her burden to show a threat of prosecution is light. In *Babbit*, the State had taken no steps toward prosecution, but the Court found a credible threat because the State "had not disavowed" prosecuting the law and plaintiffs had "some reason" to fear prosecution. *Babbitt*, 442 U.S. at 302. In *Virginia v. American Booksellers Association*, the Court found a credible threat for the simple reason that "[t]he State has not suggested that the newly enacted law will not be enforced, and we see no reason to assume otherwise." *Virginia v. Am. Booksellers Ass'n, Inc.*, 484 U.S. 383, 393 (1988).

Just like Arizona in *Babbit* and Virginia in *American Booksellers*, Colorado has refused to disavow enforcement of the counseling censorship law against Chiles. Colorado has challenged Chiles's standing at every step of the litigation, but it has never disavowed enforcement against her. To the contrary, it has expressly declined to disavow enforcement. *See* Appellees' Principal and Response Brief at 24, *Chiles v. Salazar*, 116 F.4th 1178 (10th Cir. 2024) (Nos. 22-1445 & 23-1002). Colorado protests that the law has not been enforced since its passage, but the same was true in *Babbit*, 442 U.S. at 302. The Court has never been "troubled by the pre-enforcement nature" of lawsuits. *Am. Booksellers Ass'n, Inc.*, 484 U.S. at 393. The State's lack of enforcement action in the short time

since the law was enacted should thus be accorded little weight.

This is especially true in light of Colorado's storied history of aggressively deploying its laws against religious people. The cases that have recently made their way to this Court, *303 Creative LLC v. Elenis*, 600 U.S. 570 (2023), and *Masterpiece Cakeshop v. Colorado Civil Rights Commission*, 584 U.S. 617 (2018), are only the tip of the iceberg. In just the past two years, the State has banned religious preschools from its universal preschool program, *see* Complaint, *Darren Patterson Christian Academy v. Loy*, No. 1:23-cv-01557 (D. Colo. June 6, 2023), banned religious medical centers from engaging in abortion-reversal protocols, *see* Complaint, *Bella Health v. Weiser*, No. 1:23-cv-00939 (D. Colo. April 14, 2023), required all places of public accommodation to use customers' preferred pronouns, *see* Complaint, *Defending Education v. Sullivan*, No. 1:25-cv-01572 (D. Colo. May 19, 2025), and required a Christian children's camp to allow campers to use showers and sleeping facilities designated for the opposite sex, *see* Complaint, *Camp Id-Ra-Ha-Je Association v. Roy,* No. 1:25-cv-01484 (D. Colo. May 12, 2025).

These cases and the plain text of the statute give Chiles a credible fear of enforcement. She has alleged an intent to violate the statute, Colorado insists it will prosecute her if she does, and the State has wielded its laws against similarly situated parties in the past. This more than satisfies the test applied by this Court in other pre-enforcement cases.

C. More than a dozen federal court opinions support Chiles's claim to standing.

Fourteen federal courts have considered pre-enforcement challenges to counseling censorship laws just like Colorado's and all of them either found standing or assumed it was present. The majority of these cases look just like Chiles's: the wording of the statute is the same, the counselors' allegations are the same, and the standing issues are the same.

Invariably, the six federal courts to directly address the issue have found that counselors have standing to bring a pre-enforcement challenge based on the kind of allegations presented in Chiles's complaint. *See Tingley v. Ferguson*, 47 F.4th 1055, 1066-69 (9th Cir. 2022); *Cath. Charities of Jackson v. Whitmer*, 764 F. Supp. 3d 623, 651 (W.D. Mich. 2025); *Tingley v. Ferguson*, 557 F. Supp. 3d 1131, 1137–38 (W.D. Wash. 2021); *Otto v. City of Boca Raton*, 353 F. Supp. 3d 1237, 1245–46 (S.D. Fla. 2019); *Vazzo v. City of Tampa*, 2019 WL 1048294, at *4–5 (M.D. Fla. Jan. 30, 2019), *R. & R. adopted*, 2019 WL 1040855 (M.D. Fla. Mar. 5, 2019); *Doyle v. Hogan*, 2019 WL 3500924, at *8–9 (D. Md. Aug. 1, 2019).

Four of these opinions consider challenges functionally identical to Chiles's. In *Catholic Charities*, *Tingley*, and *Doyle*, courts confronted pre-enforcement challenges to statutes with the same wording as Colorado's and addressed the same standing arguments that are presented here. *See* 764 F. Supp. 3d 623; 557 F. Supp. 3d 1131; 47 F.4th 1055; 2019 WL 3500924.

Though many federal courts have found standing in cases like this one, it has been even more common for courts to simply assume that counselors have

standing to bring such a challenge. Eight courts have addressed pre-enforcement actions of the kind brought by Chiles and not even addressed standing. *Doyle v. Hogan*, 1 F.4th 249 (4th Cir. 2021); *Otto v. City of Boca Raton*, 981 F.3d 854 (11th Cir. 2020); *Welch v. Brown*, 834 F.3d 1041 (9th Cir. 2016); *King v. Governor of N.J.*, 767 F.3d 216 (3d Cir. 2014); *Pickup v. Brown*, 728 F.3d 1042 (9th Cir. 2013); *King v. Christie*, 981 F. Supp. 2d 296 (D.N.J. 2013); *Pickup v. Brown*, 42 F. Supp. 3d 1347 (E.D. Cal. 2012); *Welch v. Brown*, 907 F. Supp. 2d 1102 (E.D. Cal. 2012).

Each of these opinions faithfully applies this Court's precedent on pre-enforcement challenges to conclude that a counselor has standing to challenge a law just like Colorado's. The Court should continue this trend by applying its own precedent in the same way.

II. Censoring counselors' speech on sensitive issues of religious importance hurts churches, ministries, and children.

While the counseling censorship law is an affront to Chiles's First Amendment rights, the Court should not lose sight of the heavy burden it imposes on churches, ministries, and children. Holding that Chiles lacks standing will restrict the ability of churches and ministries to refer clients to counselors and work real harm to the legal rights and emotional lives of religious children.

Amici represent Christian ministries dedicated to speaking Biblical truth and encouraging all persons, including minors, to live a life consistent with Biblical teachings. The mission of the amici includes ministry about the issues targeted by the counseling censorship

law. Churches and religious ministries often serve minors and families who find themselves in need of professional counseling services regarding issues of same-sex attraction and gender identity. To serve those people, it is necessary for the churches and ministries to refer them for counseling services, including for the counseling Colorado has banned. The record reflects that Chiles herself frequently receives patient referrals from churches. *See* Pet.App. 214a. If Colorado's counseling censorship law is allowed to stand, then churches and ministries alike will find themselves unable to make religiously motivated counseling referrals.

This is no small burden—issues of same-sex attraction and gender identity strike at the heart of Christian doctrine concerning human identity. Churches and ministries routinely encounter minors struggling with gender identity or sexuality. Some desire to become comfortable with their biological sex. Some want counseling help to direct their focus to opposite-sex relationships. Regardless of the precise issue, fulfillment of a Christian ministry's mission requires helping these children come to a better understanding of who they are and how they can live a good Christian life.

"The [Free Exercise] Clause protects not only the right to harbor religious beliefs inwardly and secretly," but also "the ability of those who hold religious beliefs of all kinds to live out their faiths in daily life…" *Kennedy v. Bremerton Sch. Dist.*, 597 U.S. 507, 524 (2022). If the counseling censorship law stands, ministries and churches will be totally unable to offer referrals to licensed counselors who can help these children live out their faith.

This is also a weighty burden on the children who will be underserved. As an initial matter, the law infringes on their First Amendment right to receive information. In addition to the right to control one's own speech, the First Amendment includes a "right to receive information and ideas." *Virginia Pharmacy Bd. v. Virginia Consumer Council*, 425 U.S. 748, 756–57 (1976) (internal quotation marks and citation omitted); *see also Martin v. City of Struthers, Ohio*, 319 U.S. 141, 143 (1943) (First Amendment "necessarily protects the right to receive" information). By censoring counselors, Colorado is also preventing children from receiving the counseling they request.

But this harm is more than purely legal; many of these children are truly struggling with issues that require the help of a professional counselor. Chiles allows her clients to set the goals of their counseling—every client Chiles would serve but for the counseling censorship law has specifically requested her help. Under Colorado law, those children now have nowhere to turn. Rather than allow them to receive professional counseling to reconcile their feelings and religious convictions, Colorado has chosen to leave them adrift. And make no mistake, it has chosen this path because it disagrees with their religious convictions. Children are being denied counseling by licensed professionals because their religion contradicts the State's determination of "what shall be orthodox in politics, nationalism, religion, or other matters of opinion," *W. Virginia State Bd. of Educ. v. Barnette*, 319 U.S. 624, 642 (1943).

As Judge Bumatay recognized in the challenge to California's similar counseling ban, these counseling conversations are "often grounded in religious faith."

Tingley, 57 F.4th at 1083 (Bumatay, J., dissenting from the denial of rehearing en banc). California's law—virtually identical to Colorado's—primarily prohibits counseling from a "religious" viewpoint, sought almost "exclusively" by "individuals who have strong religious beliefs." *Id.* Thus, the counseling censorship's "real operation" is to ban a religiously motivated viewpoint. The same is true here. While touting the virtues of empathy and tolerance, Colorado has functionally banned Christian counseling on issues of sexuality and gender.

CONCLUSION

Because Chiles has alleged an intent to engage in speech arguably proscribed by Colorado law and faces a credible threat of prosecution, the Court should hold that she has standing. It should further reverse the Tenth Circuit and vindicate Chiles's First Amendment rights.

Respectfully submitted,

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