No. 24-812

In the
Supreme Court of the United States

LA DELL GRIZZELL,
ON BEHALF OF HER MINOR CHILDREN,
Petitioner,

v.

SAN ELIJO ELEMENTARY SCHOOL, ET AL.,
Respondents.

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

BRIEF OF AMICI CURIAE ADVANCING AMERICAN FREEDOM; AMERICAN ASSOCIATION OF SENIOR CITIZENS; AMERICAN ENCORE; AMERICAN VALUES; ANGLICANS FOR LIFE; CENTER FOR A FREE ECONOMY; [ADDITIONAL AMICI LISTED ON INSIDE COVER]

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QUESTIONS PRESENTED

1. Whether children must hire an attorney to pursue their claims in federal court, or whether their parents may instead litigate pro se on their behalf.

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STATEMENT OF INTEREST OF AMICI CURIAE

Advancing American Freedom (AAF) is a nonprofit organization that promotes and defends policies that elevate traditional American values, including equal treatment before the law.[1] AAF "will continue to serve as a beacon for conservative ideas, a reminder to all branches of government of their responsibilities to the nation,"[2] and believes that a person's freedom of speech and the free exercise of a person's faith are among the most fundamental of individual rights and must be secured, and that parental rights have been established beyond debate as an enduring American tradition. AAF files this brief on behalf of its 10,181 members in California and its 21,532 members in the Ninth Circuit.

Amici American Association of Senior Citizens; American Encore; American Values; Anglicans for Life; Center for a Free Economy; Eagle Forum of Georgia; Frontiers of Freedom; Charlie Gerow; International Conference of Evangelical Chaplain

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[1] Consent of the parties to the filing of this amicus brief was requested on February 24, 2025. Counsel for Petitioner gave consent. Counsel for Respondent replied, "It is my understanding that consent to file an amicus brief is not required as of the January 1, 2023 amendments to the Supreme Court Rules as long as notice is timely." Counsel for Respondent received notice of intent to file this amicus brief 37 days before Respondent's brief is due and amici encourages Respondent to engage with the arguments presented herein. No person other than Amicus Curiae and its counsel made any monetary contribution intended to fund the preparation or submission of this brief.

[2] Edwin J. Feulner, Jr., *Conservatives Stalk the House: The Story of the Republican Study Committee*, 212 (Green Hill Publishers, Inc. 1983).

Endorsers; JCCWatch.org; Tim Jones, Former Speaker, Missouri House, Chairman, Missouri Center-Right Coalition; National Apostolic Christian Leadership Conference; National Association of Parents (d/b/a "ParentsUSA"); New Jersey Family Policy Center; Noah Webster Educational Foundation; North Carolina Values Coalition; Melissa Ortiz, Principal & Founder, Capability Consulting; Pro-Life Wisconsin; Setting Things Right; 60 Plus Association; Stand for Georgia Values Action; The Justice Foundation; Young America's Foundation; and Young Conservatives of Texas believe that parents have a fundamental right to raise their children according to their own values and that they accordingly have the right to represent their children's interest in court.

INTRODUCTION AND SUMMARY OF THE ARGUMENT

This case concerns whether a parent is required to pay potentially expensive attorney fees if he or she wants to bring suit in federal court to defend his child's rights. If the answer is yes, as the Ninth Circuit panel held under its binding precedent, the judicial review central to the vindication of the rights of parents and their children will be inaccessible to parents who cannot retain a lawyer. Such a rule is inconsistent with Americans' right to equality before the law. For that reason, the Ninth Circuit's precedent should be overturned and its ruling in this case reversed.

La Dell Grizzell sued San Elijo Elementary School and the San Marcos Unified School District but

was denied review of the merits of her claim because the district court found, and the Ninth Circuit panel affirmed, that under that circuit's precedent, parents cannot represent their children *pro se*. The Ninth Circuit made clear that while it was ruling against Ms. Grizzell in obedience to its precedent, Ms. "Grizzell unquestionably raises concerns with grave implications for children's access to justice." Pet. App. at 8.

Governments exist to "secure" the "unalienable," God-given rights of the people, including their rights to "life, liberty, and the pursuit of happiness." Declaration of Independence para. 2 (U.S. 1776). Article III courts play a crucial "backstop role" in the Constitution's design for protecting rights from government abuse. *Cf., Bush v. Vera*, 517 U.S. 952, 985 (1996). Parents have a fundamental right to direct the upbringing of their children, as recognized by this Court for decades. *Pierce v. Society of Sisters*, 268 U.S. 510, 534-35 (1925) (finding that "parents and guardians" have a fundamental liberty "to direct the upbringing and education of children under their control."). That right, however, and the fundamental rights of children themselves, are insecure so long as parents and their children are barred from court unless they can afford to hire a lawyer.

Parental rights have come under attack around the country in recent years with government employees substituting their judgment for that of parents without anything close to sufficient justification for doing so. This assault has affected millions of families. Worse still, on grounds of standing, mootness, and others, courts have shut their doors in the face of parents seeking judicial redress of

their claims. What Dr. Thomas Sowell wrote in 1993 has been more true than ever over the last several years:

> Parents who send their children to school with instructions to respect and obey their teachers may be surprised to discover how often these children are sent back home conditioned to disrespect and disobey their parents. While psychological-conditioning programs may not succeed in producing the atomistic society, or the self-sufficient and morally isolated individual which seems to be their ideal, they may nevertheless confuse children who receive very different moral and social messages from school and home. In short, too many American schools are turning out students who are not only intellectually incompetent but also morally confused, emotionally alienated, and socially maladjusted.[3]

The Court should grant certiorari, overturn the Ninth Circuit's counsel mandate rule, and allow Ms. Grizzell's case to proceed to the merits.

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[3] Thomas Sowell, *Inside American Education: The Decline, the Deception, the Dogmas*, ix-x (The Free Press 1993).

ARGUMENT

I. Parents Have the Fundamental Right to Direct the Upbringing of Their Children.

Parental rights have been "established beyond debate as an enduring American tradition." *Wisconsin v. Yoder*, 406 U.S. 205, 232 (1972). As this Court explained in *Troxel v. Glanville*, "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." 530 U.S. 57, 65-66 (2000). These parental rights, including "[t]he liberty interest in family privacy," have their source "in intrinsic human rights as they have been understood in 'this Nation's history and tradition.'" *Smith v. Organization of Foster Families*, 431 U.S. 816, 845 (1977) (quoting *Moore v. East Cleveland*, 431 U.S. 494, 503 (1977)).

Further, "[t]he fundamental theory of liberty upon which all governments in this Union repose excludes any general power of the State to standardize its children by forcing them to accept instruction . . . The child is not the mere creature of the State." *Pierce*, 268 U.S. 510, 535 (1925).

In a speech at Hillsdale College, then-Secretary of Education Betsy DeVos said that "the family" is a "sovereign sphere" "that predates government altogether. It's been said, after all, that the family is not only an institution; it's also the foundation for all other institutions. The nuclear family cultivates art, athletics,

business, education, faith, music, film – in a word, culture."[4]

Undermining fundamental parental rights undermines our culture. Secretary DeVos was echoing this Court when it wrote, "that the custody, care and nurture of the child reside first in the parents, whose primary function and freedom include preparation for obligations the state can neither supply nor hinder" and that the Court's "decisions have respected the private realm of family life which the state cannot enter." *Prince v. Commonwealth of Massachusetts*, 321 U.S. 158, 166 (1944).

The Court has found that parental rights, rooted in fundamental rights that pre-exist government, are recognized in the Free Exercise Clause of the First Amendment and the Due Process Clause of the Fourteenth Amendment.[5] *Yoder*, 406 U.S. at 214 (citing *Pierce*, 286 U.S. at 535) ("[A] State's interest in education . . . is not totally free from a balancing process when it impinges on fundamental rights and interests, such as those specifically protect by the Free Exercise Clause of the First Amendment, and the traditional interests of parents with respect to the religious upbringing of their children."); *Meyer v.*

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[4] Reverend Ben Johnson, *Redemption, not retreat: Besty Devos' vision for redeeming U.S. education*, Akton Institute (Oct. 20, 2020) available at https://rlo.acton.org/archives/117383-redemption-not-retreat-betsy-devos-vision-for-redeeming-u-s-education.html.

[5] That the rights of parents "are, objectively, deeply rooted in this Nation's history and tradition," *Washington v. Glucksberg*, 521 U.S. 702 (1997) (quoting *Moore v. East Cleveland*, 431 U.S. 494, 530 (1977) (plurality opinion)), is an essential element of judicial analysis of parental rights to guard against the danger of judicial invention of novel constitutional rights.

Nebraska, 262 U.S. 390, 399 (1923) ("While this court has not attempted to define with exactness the [due process] liberty . . . Without doubt, it denotes . . . the right of the individual to . . . marry, establish a home and bring up children."); *Troxel*, 530 U.S.at 65-66 ("The liberty interest at issue in this case- In light of this extensive precedent, it cannot now be doubted that the Due Process Clause of the Fourteenth Amendment protects the fundamental right of parents to make decisions concerning the care, custody, and control of their children.").

These fundamental rights, so long recognized by the Constitution, are under attack around the country.

II. The Assault on Parents' and Children's Rights Around the Country Demonstrates the Urgent Need for Clarification that Parents Are Fully Able to Represent the Interests of Their Children in Court.

The rights of parents and their children depend on courts playing their "backstop role." *Cf., Vera*, 517 U.S. at 985. This is especially true when, as is now the case, parental rights are under widespread assault. The courts are the last line of defense against factional control of government institutions and the rights-destroying effects that control can and does produce. The concerns of America's parents are justified as demonstrated by the cases that have been brought around the country seeking judicial relief. The availability of judicial review should not turn on whether parents can afford to hire a lawyer.

A. Schools around the country have adopted policies that intentionally infringe on the fundamental rights of parents.

Parents around the country have challenged efforts by school officials to undermine their authority and violate the rights of their children. Parents in several of these cases have faced the obstacle of narrowly read standing requirements in their efforts to vindicate their rights and the rights of their children.

In *Parents Protecting Our Children, UA v. Eau Claire Area Sch. Dist.*, the Seventh Circuit found that parents lacked standing to challenge the school's policy that it would not inform parents that it is engaging in so-called "social gender transitioning" with their children. No. 23-1280, slip op. at 1, 604 U.S. __ (Alito, J., dissenting from denial of certiorari). The school district in question trained teachers that "parents are not entitled to know their kids' identities. That knowledge must be earned."[6] *Id.* at 1-2. Despite this blatant anti-parent mentality, the Seventh Circuit held that the parents' harm was speculative and thus insufficient to confer standing. *Id.* at 2. Further, similar policies have been adopted across the country leaving millions of parents and children at risk. *See id.* at 1. According to Parents Defending Education, 20,951 schools educating approximately 12,222,924 students have adopted policies that would allow or require teachers and staff to withhold

[6] Brief of Amici Curiae Advancing American Freedom et al., *Parents Protecting Our Children, UA v. Eau Claire Area Sch. Dist.*, No. 23-1280 available at https://advancingamericanfreedom.com/parents-protecting-our-children-v-eau-claire-area-school-district/.

information from parents about their children's gender identity.[7] Thus, it is not surprising that cases challenging these policies have been brought around the country.

In the First Circuit, a mother found that her daughter had received a "chest binder," a device intended to hide her daughter's breasts to make her appear more masculine, from her school in Maine. Complaint at 1-2, *Lavigne v. Great Salt Bay Cmty. Sch.*, No. 2:23-cv-00158-JDL, 2024 U.S. LEXIS 80828 (D. Maine 2024). In another case in the First Circuit, this time out of Massachusetts, parents of two children who, at the time of the relevant events in the case were eleven and twelve years old, sued their children's school after school officials had secretive conversations with the children about their gender identity, began using alternative names and pronouns for the children, and concealed these actions from the parents.[8] *Foote v. Town of Ludlow*, No. CV 22-30041-MGM, 2022 WL 18356421, at *1 (D. Mass. Dec. 14, 2022).

In the Second Circuit, a school district concealed its facilitation of a twelve-year-old girl's social gender transition from her mother despite the mother's repeated requests for information that might

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[7] *List of School District Transgender-Gender Nonconforming Student Policies*, Parents Defending Education (Mar. 07, 2023) (updated Oct. 30, 2024) https://defendinged.org/investigations/list-of-school-district-transgender-gender-nonconforming-student-policies/.

[8] Brief of Amici Curiae of Advancing American Freedom et al., *Foote v. Ludlow*, No. 23-1069 (1st Cir.) https://advancingamericanfreedom.com/aaf-et-amici-foote-v-ludlow-parental-rights-1st-circuit/.

shed light on her daughter's anxiety which was causing her to want to avoid school. Complaint at 1-2, *Vitsaxaki v. Skaneateles Central School District*, case no. 5:24-CV-00155 (Jan. 31, 2024).

In the Third Circuit, when a mother, concerned about her child's school district's secret gender transition policy, gave written notice of her right and expectation to be notified and consulted about any gender-related interventions with her child, the school district responded that it would not do so. Complaint at 5-6, *Doe v. Pine-Richland School District*, No. 2:24-cv-51, 2024 U.S. Dist. LEXIS 83241 (W.D. Pa. 2024).

In the Fourth Circuit, a school district adopted a policy of not informing parents about their children's social transition and included in that policy direction to deceptively revert to using the child's actual name and accurate pronouns whenever speaking with the child's parents. Petition for Writ of Certiorari at 3-4, *John and Jane Parents 1 v. Montgomery Cnty. Bd. of Ed.*, No. 23-601, *petition for certiorari denied* May 20, 2024. Similarly, in October 2022, the Montgomery County, Maryland School Board announced the approval of more than 22 LGBTQ texts as instructional materials and denied parents the opportunity to opt out of those materials, as they could from other sexual education materials, by classifying them as part of the english language arts curriculum.[9] *Mahmoud v. McKnight*, No. DLB-23-1380 at 4 (D. Md.

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[9] *See also* Brief of Amici Curiae Advancing American Freedom et al., *Mahmoud v. Taylor*, No. 24-297 available at https://advancingamericanfreedom.com/mahmoud-v-taylor/; Brief of Amici Curiae Advancing American Freedom et al., *Mahmoud v. McKnight*, No. 23-1890 (4th Cir.) available at https://advancingamericanfreedom.com/mahmoud-v-mcknight/.

Aug. 24, 2023) *aff'd*. No. 23-1890 (4th Cir. May 15, 2024), cert. granted *Mahmoud v. Taylor*, No. 24-297 (Jan. 17, 2025).

In the Sixth Circuit, a school hid its facilitation of one couple's autistic daughter's social gender transition, only inadvertently revealing it to them when an official failed to remove the male pronouns and masculine name from one part of a document, the rest of which had been doctored to hide that material from the parents. Complaint at 1-2, *Mead v. Rockford Public School District*, 1:2023cv01313 (W.D. Mich. Dec. 18, 2023).

In the Eighth Circuit, Linn-Mar Community School District in Iowa had to eliminate its Policy 504.13-R, entitled "Administrative Regulations Regarding Transgender and Students Nonconforming to Gender Role Stereotypes." ("Policy") *Parents Defending Ed. v. Linn Mar Comm. Sch. Dist.*, 83 F. 4th 658, 663 (8th Cir. 2023). The Policy was designed to do three things: (1) effectuate students' "gender transition" requests; (2) keep the District's actions secret from the students' parents; and (3) punish other students who do not use a student's preferred pronouns when speaking or who voice certain opinions concerning transgender issues. *See id*. at 663-64, 666-67.

In a case out of the Ninth Circuit,[10] the state of California used its power to impose its view of gender on the schools of a local community that voted for school district officials who would represent their values and accordingly adopted a policy that protected

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[10] *See also Mirabelli v. Olson*, 3:23-cv-00768-BEN-WVG (S.D. Cal. Sep. 14, 2023).

parents' right to know information concerning their children.[11] The state demanded that the local community reverse the policy so that parents would remain in the dark.[12]

A case in the Tenth Circuit challenged a school's "gender support plan" policy and the school's hosting, without notifying parents, after-school meetings for the Genders and Sexualities Alliance. *Lee v. Poudre Sch. Dist. R-1*, Civil Action 23-cv-01117-NYW-STV at 3-4 (D. Colo. May. 16, 2024). Parents in this case alleged that after attending these meetings, one child became depressed and ultimately attempted suicide. *Id*. at 4.

Lastly, in the Eleventh Circuit, school officials at Deerlake Middle School in Leon County, Florida discussed gender identity with January and Jeffrey Littlejohn's then-13-year-old daughter and began referring to her by an alternative name and with new pronouns in an effort to facilitate her adoption of an entirely new identity, all of which the school concealed from her parents.[13]

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[11] Sophie Austin, *California School District Changes Gender-Identity Policy After Being Sued by State*, Associated Press (7:15 PM Mar. 8, 2024) https://apnews.com/article/california-chino-gender-pronouns-school-board-a8d3f17ec89b2ec8a2e946da37284e5c.

[12] *Id. See* Motion for Summary Judgement, *California v. Chino Valley Unified Sch. Dist.*, Case No. CIVSB2317301, https://libertyjusticecenter.org/wp-content/uploads/Chino-Valley-Motion-for-Summary-Judgment.pdf

[13] Brief of Amici Curiae Advancing American Freedom et al., *Littlejohn v. Sch. Bd.of Leon Cnty.,* No. 23-10385-HH (11th Cir.) available at https://advancingamericanfreedom.com/littlejohn-v-school-board-of-leon-county-florida/.

If parents are removed from the process of raising their children, they cannot protect their children and the rights of both the parents and the children are denied. By preventing a parent from representing their own child in a court of law, the court ensures that only families wealthy enough to afford representation can afford the right to protect their child from potential violation of their rights by school districts and other governmental entities.

B. Courts have also failed to ensure the fundamental rights of parents and children in child custody cases around the country.

Parents have even lost custody of their children under false pretenses in efforts to remove any obstacle to "gender affirmation."[14]

Children's gender identity claims are being used as a basis to undermine parental authority around the country. In an Indiana case, parents M.C. and J.C. were deprived of custody of their son, A.C. Indiana's Department of Child Services initially accused M.C. and J.C. of neglect, and on that basis, had their son, A.C. removed from the home. Petition for Certiorari at 2-3, *M.C. v. Indiana Dep't of Child Servs.*, No. 23-450 (cert. denied). It later agreed to withdraw and expunge its abuse and neglect claims and proceed under a different part of the child

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[14] Brief of Amici Curiae Advancing American Freedom et al., *M.C. v. Indiana Dep't of Child Servs.*, No. 23-450 https://advancingamericanfreedom.com/m-c-and-j-c-v-indiana-department-of-child-services/; Abigail Shrier, *Child Custody's Gender Gauntlet*, City Journal (Feb. 07, 2022) https://www.city-journal.org/article/childcustodys-gender-gauntlet.

protection law the adjudication of which "is made 'through no wrongdoing on the part of either parent.'" *In re A.C.*, No. 22A-JC-49, __ N.E.3d __, slip op. at 10 (Ind. Ct. App. Oct. 21, 2022) (quoting *In re N.E.*, 919 N.E.2d 102, 105 (Ind. 2010)). Nonetheless, its decision, which the appellate court upheld, was that A.C.'s best interest would be served by continued separation from his parents. This is at least the second case where this pattern seems to have occurred: an initial claim of abuse or neglect that is later dropped yet the court continues the child's separation from his or her parents on the grounds that doing so is in the child's best interest.

In Ohio in 2018, a juvenile court stripped parents of their legal right to make a life-altering medical decision for their daughter because they would not support her taking a course of hormones nor would they call her by an alternative name. *In re: JNS*, No. F17-334 X (Hamilton County, Ohio).[15] In that case, "the allegations of abuse and neglect were withdrawn," per an agreement between the parents and the state. *In re: JNS* at 1. Nonetheless, the court granted the daughter's grandparents, who supported her efforts at gender transition, "the right to determine what medical care shall be pursued at Children's Hospital and its Transgender Program." *In re: JNS* at 4.

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[15] A copy of the *In re: JNS* order has been republished at https://www.wcpo.com/news/local-news/hamilton-county/cincinnati/transgender-boy-from-hamilton-county-wins-right-to-transition-before-college (last accessed November 28, 2023).

Similarly, in divorce custody disputes, it has repeatedly been the case that the parent who opposed gender transition was disfavored while the parent seeking to encourage or advance the gender transition of the child in question was favored. For example, in 2019 in Illinois, Jeannette Cooper had custody of her twelve-year-old daughter six days and seven nights a week.[16] However, in July of 2019, Ms. Cooper's ex-husband would not return her daughter after a regular visit because her daughter identified as transgender and felt "unsafe" with her mother.[17] The court sided with Ms. Cooper's ex-husband and as a result, as of February 2024, Ms. Cooper said that she had not seen her daughter in two and a half years.[18]

The most dramatic of such cases occurred in California in 2022 in which Ted Hudacko lost custody of his son because he was deemed insufficiently supportive of his son's gender identity.[19] The details of Mr. Hudacko's ordeal are shocking. Before denying Mr. Hudacko custody of his son, the judge initially presiding over the case, Judge Joni Hiramoto, asked him a series of patronizing questions[20] including whether Mr. Hudacko believed being transgender is a

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[16] Laurel Duggan, *Mom Stripped of Custody After Questioning Whether 12-Year-Old Daughter Was Really Trans*, Daily Caller (July 27, 2022) https://dailycaller.com/2022/07/27/mother-daughter-transgender-custody-jeannette-cooper/.

[17] *Id*.

[18] Hailey Gomez, *'Absolutely Not': Illinois Mother Slams Bill to Consider Denial of 'Gender-Affirming Care' Child Abuse*, Daily Caller (Feb. 22, 2024)

[19] Abigail Shrier, *Child Custody's Gender Gauntlet*, City Journal (Feb. 07, 2022) https://www.city-journal.org/article/child-custodys-gender-gauntlet.

[20] *Id*.

sin and whether he preferred to think that his son was just going through a phase.[21] After this line of questioning, Judge Hiramoto granted Mr. Hudacko's ex-wife full legal custody of his son.[22] However, she granted Mr. Hudacko and Ms. Hudacko joint custody of their other son,[23] suggesting that the only reason Mr. Hudacko was not awarded partial custody the son at issue in the case was his lack of total support for that son's transgender self-identification. Judge Hiramoto was eventually replaced on the case because of her failure to disclose to the parties that she was a parent to, and vocal supporter of, a son who identifies as a woman.[24] As of July of 2023, Mr. Hudacko said he had not seen his son in three years.[25]

These stories represent just a few of the families broken by family courts around the country which have taken it upon themselves to deprive parents of their rights. Whether by denying standing or accepting State government maneuvers that remove the child from the home on the basis of abuse or neglect claims that are later dropped, many courts have avoided stepping in on the side of parents and their children. The harm of this judicial hesitance is magnified by the passage of time since, when the child reaches the age of 18, parents' claims are at risk of being found moot. Government actors thus often need

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[21] *Id.*
[22] *Id.*
[23] *Id.*
[24] *Id.*
[25] Brandon Showalter, *Inside a Father's Fight to Save His Son in 'Trans Sanctuary State' of California*, Christian Post (July 17, 2023) https://www.christianpost.com/news/fathers-fight-to-save-son-in-trans-sanctuary-state-of-california.html.

only run out the clock to have succeeded in depriving parents of their rights. The rule at issue in this case baring parents from representing their children *pro se* is yet another instance of court precedent that harms the rights of parents and children.

III. Parents Have the Fundamental Right to Represent and Defend Their Children's Interests Which Includes the Authority to Represent Their Children *Pro Se*.

The rights of parents to represent the interests of their children is an essential element of the parental right to direct the upbringing of their children. Without judicial intervention when the government violates the rights of parents and their children, the guarantees of the First and Fourteenth Amendments are no more than "parchment barriers."[26]

Judge Andrew Oldham of the Fifth Circuit has written that the counsel mandate interpretation of § 1654 and Federal Rule of Civil Procedure 17(c) "offers minors a Hobson's choice: litigate with counsel, or don't litigate at all." *Raskin on behalf of JD v. Dallas Indep. Sch. Dist.*, 69 F.4th 280, 294 (5th Cir. 2023) (Oldham, J., dissenting in part and concurring in judgment). That interpretation, according to Judge Oldham, "plainly defies the text of the statute and centuries of Anglo-American law dating as far back as the Magna Carta," and "would have baffled the Founders." *Id*. He goes on to explain, "'the basic right to self-representation was never questioned' at the

[26] The Federalist No. 48 at 256 (James Madison) (George W. Carey and James McClellan, eds., The Liberty Fund 2001).

Founding, and 'the notion of compulsory counsel was utterly foreign to the Founders.'" *Id*. (quoting *Faretta v. California,* 422 U.S. 806, 827-28 (1975)).

Because the fundamental rights of parents and children are not secure without meaningful judicial review, that review must not be locked behind expensive attorney fees. This Court should thus grant certiorari and strike down the counsel mandate.

CONCLUSION

The Court should grant certiorari and rule for Petitioner.

Respectfully submitted,

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