

No. 24-539

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IN THE  
**Supreme Court of the United States**

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KALEY CHILES,

*Petitioner,*

v.

PATTY SALAZAR, in her official capacity as Executive  
Director of the Colorado Department of Regulatory  
Agencies, et al.,

*Respondents.*

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

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**BRIEF FOR AMICI CURIAE FORMER  
CONVERSION THERAPY LEADERS IN  
SUPPORT OF RESPONDENTS**

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Mallory , Christie, et al., The Williams Institute, <i>Conversion Therapy and LGBT Youth: Update (June 2019)</i> , available at <a href="https://williamsinstitute.law.ucla.edu/publications/conversion-therapy-and-lgbt-youth/">https://williamsinstitute.law.ucla.edu/pu blications/conversion-therapy-and-lgbt- youth/</a> .....	6
Marks, Jeremy, Courage UK Transformation Statement (2001), available at <a href="https://www.courage.org.uk/articles/change.shtml">https://www.courage.org.uk/articles/chan ge.shtml</a> .....	9

## TABLE OF AUTHORITIES—Continued

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Movement Advancement Project, Equality Maps: Conversion Therapy Laws (2025), available at <a href="https://www.lgbtmap.org/equality-&lt;br/&gt;maps/conversion_therapy">https://www.lgbtmap.org/equality- maps/conversion_therapy</a> .....	10
Smid, John, Grace Rivers Blog (Nov. 8, 2011), available at <a href="http://graceriversblog.blogspot.com">http://graceriversblog.blogspot.com</a> .....	6
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## INTEREST OF AMICI CURIAE<sup>1</sup>

Amici curiae Michael Bussee, Alan Chambers, John Paulk, Warren Throckmorton, Yvette Schneider, Bill Prickett, Tim Rymel, Randy Thomas, and David Matheson are former leaders, founders, and promoters of conversion therapy programs who now publicly repudiate these practices. Their perspective is rare and uniquely valuable: they are the insiders who built the field, witnessed its implementation across hundreds of individuals and dozens of states, and now stand united in opposition to its continued use.

Together, amici represent more than half a century of experience in conversion therapy programs. They were not merely participants—they were the architects, leaders, and most vocal advocates of what was once called “reparative therapy,” “ex-gay therapy,” or “sexual orientation change efforts” (SOCE). Few people are more knowledgeable about the ineffectiveness and documented harm of conversion therapy because they witnessed it firsthand and now bear the moral responsibility to prevent future damage.

They cannot take back the harm they caused, but they recognize their unique obligation and opportunity to prevent future damage by sharing

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<sup>1</sup> Pursuant to Rule 37.6, amici curiae certify that no counsel for a party authored this brief in whole or in part and that no person or entity, other than *amici* or their counsel, has made a monetary contribution to the preparation or submission of this brief. Sup. Ct. R. 37.6.

what they learned through decades of failed attempts to change sexual orientation and gender identity.

### **SUMMARY OF THE ARGUMENT**

Based on their collective experience as former conversion therapy leaders, amici submit that: (1) conversion therapy is fundamentally ineffective, with former movement leaders acknowledging that 99.9% of participants do not experience orientation change; (2) these practices cause documented psychological harm, including increased suicide risk, particularly among LGBTQ youth; (3) the systematic renunciation by conversion therapy's own founders and leaders provides compelling evidence of the practice's harmful nature; (4) conversion therapy undermines rather than strengthens families by creating conflict and damaging parent-child relationships; and (5) regulations protecting minors from these practices align with established professional medical and mental health standards while preserving legitimate therapeutic relationships.

### **ARGUMENT**

#### **I. AMICI'S UNIQUE PERSPECTIVE: FOUNDERS AND FORMER LEADERS OF THE CONVERSION THERAPY MOVEMENT**

Amici's credentials within the conversion therapy movement are unparalleled. They founded, led, and promoted the organizations and programs that

defined this field for decades. Their collective experience includes:

- **Michael Bussee:** Co-founder of Exodus International in 1976, the world's largest ex-gay ministry.
- **Alan Chambers:** Former president of Exodus International, who closed the organization in 2013 after issuing a public apology.
- **John Paulk:** Former Exodus chairman (1998-2003) and founder of Focus on the Family's Love Won Out conferences.
- **Warren Throckmorton:** Past president of the American Mental Health Counselors Association and producer of the film *I Do Exist*, which claimed gay and lesbian people could change.
- **Yvette Schneider:** Former Exodus International Director of Women's Ministry and former Family Research Council Policy Analyst/Spokesperson.
- **Bill Prickett:** A former Southern Baptist pastor who founded and directed Coming Back, an ex-gay support group based in Birmingham, Alabama and affiliated with Exodus International.
- **Tim Rymel:** Outreach Director (1991-1996), Love in Action



- **Randy Thomas:** Executive Vice President (2002-2013), Exodus International; Director (1997-2002), Living Hope Ministries.
- **David Matheson:** Former Director, Journey into Manhood

Together, they oversaw programs that impacted hundreds of individuals across multiple countries. They were teaching what they had been taught—that LGBTQ identities needed “mending.” They grew up hearing that being LGBTQ was disordered, sinful, or displeasing to God, and they perpetuated these harmful messages.

## II. CONVERSION THERAPY IS INEFFECTIVE AND CAUSES DOCUMENTED HARM

Amici’s firsthand experience confirms what scientific research has established: conversion therapy does not work and causes significant harm.

### A. Documented Ineffectiveness

The most damning admission came from Alan Chambers, president of Exodus International, who acknowledged in January 2012 that “the majority of people that I have met, and I would say the majority meaning 99.9% of them have not experienced a change in their orientation.”<sup>2</sup> This statistic, coming from the movement’s most prominent leader, effectively

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<sup>2</sup> Lisa Ling, *This is Life with Lisa Ling: Pray the Gay Away?*, CNN (Jan. 26, 2014) (documenting Alan Chambers’ admission regarding 99.9% ineffectiveness rate).

admitted that the central promise of conversion therapy was false.

Michael Bussee, after 40 years of observation, stated unequivocally: “I have never met a gay person who became heterosexual through conversion therapy or ex-gay programs.”<sup>3</sup>

### **B. Psychological and Emotional Harm**

Conversion therapy reinforces internalized homophobia, anxiety, guilt, and depression. It leads to self-loathing and emotional and psychological harm when the promised change doesn’t happen. The repetitive message amici promoted was clear: LGBTQ people were never enough—not straight enough, not Christian enough, not faithful enough. This message is poison to the soul, especially a child’s soul.

Research confirms their observations: 27% of LGBTQ youth who experienced conversion therapy attempted suicide in the previous 12 months, compared to 9% who had not experienced it.<sup>4</sup> The Williams Institute estimates that 700,000 Americans have been subjected to these practices, with an

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<sup>3</sup> Michael Bussee, *Ex-Gay Survivor Speaks Out, Beyond Ex-Gay* (2007), available at <http://www.beyondexgay.com/article/bussee>.

<sup>4</sup> Ryan C. Watson et al., *Sexual and Gender Minority Conversion Therapy and Victimization Among LGBTQ Youth*, *Am. J. Public Health* 110(1), 42-47 (2020).

economic cost of \$9.23 billion annually in harm and healthcare costs.<sup>5</sup>

As McKrae Game acknowledged after founding one of America's largest programs: "People said they attempted suicide over me and the things I said to them. People, I know, are in therapy because of me."<sup>6</sup> John Smid reflected on the devastating toll: "Many succumbed to suicide due to their own despair caused by the conditional messages that if they didn't become 'straight' it was their fault."<sup>7</sup>

### **III. THE MASS RENUNCIATION BY MOVEMENT LEADERS CONFIRMS THE PRACTICE'S FUNDAMENTAL FLAWS**

The systematic collapse of conversion therapy leadership represents unprecedented evidence of the practice's harmful nature. This was not a single defection but a pattern of renunciations spanning decades:

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<sup>5</sup> Christy Mallory et al., The Williams Institute, *Conversion Therapy and LGBT Youth: Update (June 2019)*, available at <https://williamsinstitute.law.ucla.edu/publications/conversion-therapy-and-lgbt-youth/>.

<sup>6</sup> McKrae Game, Post and Courier Interview (June 20, 2019), available at <https://www.postandcourier.com/news/former-conversion-therapy-leader-comes-out-gay>.

<sup>7</sup> John Smid, Grace Rivers Blog (Nov. 8, 2011), available at <http://graceriversblog.blogspot.com>.

- **1979:** Michael Bussee left Exodus International after falling in love with fellow leader Gary Cooper.
- **2007:** Multiple leaders issued joint apologies acknowledging harm caused.
- **2012-2013:** The movement's institutional collapse accelerated with Chambers' admissions and Exodus's closure.
- **2014:** Nine former ex-gay leaders signed an open letter calling for nationwide bans on conversion therapy.
- **2019:** McKrae Game posted on Facebook: "20yrs in exgay ministry I WAS WRONG! Please forgive me!"<sup>8</sup>

Alan Chambers's June 19, 2013 apology captured the moral reckoning: "I am sorry for the pain and hurt many of you have experienced. I am sorry that some of you spent years working through the shame and guilt you felt when your attractions didn't change."<sup>9</sup> He acknowledged the most devastating impact: "I am profoundly sorry that many have walked away from

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<sup>8</sup> McKrae Game, Facebook Post (June 2019), screenshot available at Truth Wins Out archives, <https://archive.truthwinsout.org>.

<sup>9</sup> Alan Chambers, *I Am Sorry*, Exodus International (June 19, 2013), archived at <https://web.archive.org/web/20130622031108/http://exodusinternational.org/2013/06/i-am-sorry>.

their faith and that some have chosen to end their lives.”<sup>10</sup>

#### **IV. CONVERSION THERAPY UNDERMINES FAMILIES AND PARENTAL AUTHORITY**

Contrary to claims that conversion therapy strengthens families, amici’s experience demonstrates that these practices systematically damage family relationships and undermine parental authority.

Conversion therapy often pressures children to reject or hide their identities, creating conflict between youth and their parents and inflicting lifelong damage on family relationships. These programs frequently:

- Separate children from their parents for months or years at a time.
- Blame parents for their child’s LGBTQ identity.
- Mislead or coerce parents into participating.
- Require parents to sign away rights to know what happens in therapy sessions.
- Keep parents in the dark about session content.

Such practices erode trust, create long-term relational harm, and disrupt the ability to raise children in a safe and loving environment. Jeremy Marks observed a crucial pattern: “I realised that the people who were doing well were the ones who had accepted their sexuality and found partners. They

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<sup>10</sup> *Ibid.*

thrived with love in their lives.”<sup>11</sup> Protecting minors from conversion therapy preserves family cohesion and parental authority while safeguarding children’s well-being, allowing families to navigate these issues with proper professional support rather than harmful interventions.

## **V. PROFESSIONAL AND LEGISLATIVE RECOGNITION OF CONVERSION THERAPY’S HARMFUL NATURE**

Amici’s renunciations align with the unanimous position of major professional medical and mental health organizations, which have consistently denounced attempts to change sexual orientation or gender identity.<sup>12</sup> This professional consensus, combined with the admissions of former conversion therapy leaders, has driven legislative action across the United States.

As of 2025, 23 states plus D.C. and Puerto Rico have enacted laws protecting youth from conversion therapy, with former leaders’ testimonies frequently

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<sup>11</sup> Jeremy Marks, Courage UK Transformation Statement (2001), available at <https://www.courage.org.uk/articles/change.shtml>.

<sup>12</sup> See Am. Psychological Ass’n, Resolution on Appropriate Affirmative Responses to Sexual Orientation Distress and Change Efforts (Aug. 2009); Am. Medical Ass’n, Policy H-160.991, Health Care Needs of the Homosexual Population (2019); Am. Academy of Pediatrics, Office-Based Care for Lesbian, Gay, Bisexual, Transgender, and Questioning Youth, *Pediatrics* 132(1), 198-203 (2013).

cited in legislative hearings.<sup>13</sup> California became the first state to ban conversion therapy for minors in 2012, with the law signed shortly after the Exodus conference where Chambers apologized.<sup>14</sup>

Regulations that prohibit licensed mental health providers from engaging in conversion therapy strike the right balance of protecting LGBTQ youth while preserving professional standards and legitimate therapeutic relationships. These laws do not restrict religious counseling or pastoral care but ensure that licensed professionals cannot engage in practices that every major medical and mental health organization has condemned as harmful.

## CONCLUSION

As former leaders who built and promoted the conversion therapy movement, amici stand uniquely positioned to attest to its fundamental flaws and harmful nature. Their collective admission that orientation change through religious intervention or therapy simply does not occur—validated by Alan Chambers' acknowledgment that 99.9% of participants experience no change—removes any

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<sup>13</sup> Movement Advancement Project, Equality Maps: Conversion Therapy Laws (2025), available at [https://www.lgbtmap.org/equality-maps/conversion\\_therapy](https://www.lgbtmap.org/equality-maps/conversion_therapy).

<sup>14</sup> Cal. Bus. & Prof. Code § 865 et seq. (enacted Sept. 30, 2012).

remaining veneer of credibility these practices once claimed.

Amici join together in calling for protections against conversion therapy because they have witnessed firsthand the devastating harm it causes, particularly to LGBTQ youth. Regulations prohibiting licensed mental health providers from engaging in these practices protect vulnerable young people while preserving legitimate therapeutic relationships and professional standards.

The pattern is unmistakable: leader after leader discovered the same truth they now collectively acknowledge—genuine orientation change through conversion therapy does not occur. Their courage in admitting this publicly, often at great personal and professional cost, reflects their moral obligation to prevent future harm to LGBTQ individuals and their families.

Respectfully submitted,

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