No. 25-840

In the Supreme Court of the United States

INTERNATIONAL PARTNERS FOR ETHICAL CARE, INC., ET AL.,

Petitioners,

v.

BOB FERGUSON, GOVERNOR OF WASHINGTON, ET AL.,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

BRIEF OF ABIGAIL MARTINEZ AS *AMICUS CURIAE* SUPPORTING PETITIONERS

MORIAH O'HARE*
FIRST LIBERTY INSTITUTE
1331 Penn. Ave. NW
Suite 1410
Washington, DC 20004
**Supervised by D.C. bar member*

Counsel for Amicus Curiae

KELLY J. SHACKELFORD
Counsel of Record
JEFFREY C. MATEER
DAVID J. HACKER
JEREMIAH G. DYS
KAYLA A. TONEY
FIRST LIBERTY INSTITUTE
2001 W. Plano Pkwy
Suite 1600
Plano, TX 75075
(972) 941-4444
kshackelford@firstliberty.org

QUESTION PRESENTED

Whether parents have standing to challenge a law or policy that deliberately displaces their decision-making role as to "gender transitions" of their children, and in so doing creates present and likely future impediments to their ability to parent their children as they deem best for them.

TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES

CASES

OTHER AUTHORITIES

INTEREST OF *AMICUS CURIAE*[1]

Amicus Abigail Martinez is a bereaved mother who lost her daughter Yaeli Galdamez to suicide in September 2019. Ms. Martinez is a devout Christian who immigrated from El Salvador as a teen and raised four children in southern California. She shares her family's tragic story in hopes that other families will not experience similar heartache from policies that exclude parents and pressure vulnerable minors to pursue gender transitions, often at the expense of their mental and physical health.

Yaeli (right) and her mother Abigail Martinez. Photos courtesy of Abigail Martinez.

Ms. Martinez urges this Court to consider the consequences of this petition for the parents in this

[1] All parties were timely notified of the filing of this brief. No counsel for a party authored this brief in whole or in part, and no party or counsel for a party made a monetary contribution intended to fund the preparation or submission of this brief. No person or entity other than *amici curiae* or their counsel made a monetary contribution to this brief's preparation or submission.

case who are seeking to have the right to raise their children in accordance with their conscience and for families around the country facing similar situations.

In 2015, Abigail Martinez's teenage daughter Yaeli, a student in California's Arcadia Unified School District, began questioning her sexuality. She was bullied in middle school and struggled with depression, but this questioning was new. School staff told Yaeli to clandestinely join the LGBTQ club, where she was persuaded that the only way to be happy was to change her gender. An older transgender student, also a female transitioning to male, convinced Yaeli that her depression was because she was transgender. That same year, Arcadia Unified School District adopted a policy requiring staff to use preferred names and pronouns for transgender students without parental notification or permission, or any "medical or mental health diagnosis or treatment threshold." [2] The district directed staff to keep students' actual or perceived gender identity "private" from parents.

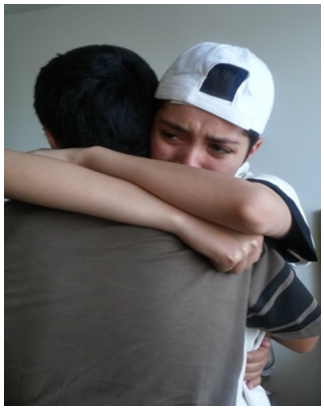
At age 16, the parent of Yaeli's transgender classmate took Yaeli from her mother's home and hid her for two days. The school psychologist pushing Yaeli's gender transition told her to accuse her mother of abuse at the police station, which would allow the state to pay for Yaeli's gender transition without parental consent. Based on this brainwashing, the California Department of Child and Family Services (DCFS) placed her in a group home. DCFS

---

[2] "Transgender Students – Ensuring Equity and Nondiscrimination," Arcadia Unified School District Policy Bulletin (Apr. 16, 2015), https://perma.cc/5JGK-5777.

simultaneously placed Ms. Martinez on a child abuse registry, even as she continued raising her other three children.

Siding with the school psychologist, a judge ruled that Yaeli could receive cross-sex hormones. Meanwhile, Ms. Martinez was shut out of Yaeli's life, only allowed one hourly visit per week, and her visits were heavily monitored by members of RISE, activists from the Los Angeles LGBT Center who told her to "have a funeral for your daughter and adopt your son." "I was told not to talk about God," Martinez recalls. "They told me if you do that, you'll never see your daughter."



Family visit at the group home for Yaeli's 17th birthday. Photos courtesy of Abigail Martinez.

By age 19, Yaeli was sent to an independent living situation but continued to struggle with deep depression and poverty. Desperate for food, she reached out to her mom who immediately brought her groceries. After a grueling legal battle, Ms. Martinez

was absolved of all claims of abuse and removed from the child abuse registry. But the damage was already done. Two months later, Yaeli committed suicide by lying down on the tracks in front of a train. Her death was so gruesome that the funeral home was not able to show her body to Ms. Martinez.

After Yaeli's tragic death, Ms. Martinez requested meetings with the school staff and state workers who advised Yaeli, but no one responded. She eventually filed a civil lawsuit against the school district and DCFS. In response, DCFS admitted that they "aggressively pursued the implementation of inclusive, gender-affirming laws, policies, and supportive services for LGBTQ+ youth." According to the school district, "a claim suggesting our school or a staff member did not properly treat a student's severe depression is both completely inaccurate and troubling as our schools and staff would not be authorized or medically qualified to treat clinical depression." Yet the district thought itself medically qualified to facilitate Yaeli's transition behind her mother's back and even advocate that she be removed from her home absent evidence of abuse.

The government's imposition into Yaeli's life against the wishes of her mother denied Ms. Martinez the opportunity to treat her daughter's mental health and save her life. "To them, my child was a number in the system. It's all political," said Ms. Martinez. "I want them to change this broken system, not to play with our children's lives, to give them what they really need. Not to go for what they believe. I don't want any parent to suffer and go through what I've been

through. This pain doesn't have a beginning or an end."[3]

SUMMARY OF ARGUMENT

State laws that intentionally exclude parents from their children's lives have devastating consequences and infringe upon fundamental First and Fourteenth Amendment rights.

For nearly 100 years, the Court has reaffirmed the "enduring American tradition" of "the rights of parents to direct 'the religious upbringing' of their children." *Espinoza v. Montana Dep't of Revenue*, 591 U.S. 464, 486 (2020) (quoting *Wisconsin v. Yoder*, 406 U.S. 205, 213-14 (1972)); *see also Mahmoud v. Taylor*, 606 U.S. 522 (2025) (affirming that parents' right to direct their children's religious upbringing includes the right to opt out from instruction that substantially interferes with their religious beliefs).

Despite this undeniable right, the Ninth Circuit and several lower courts have ruled that parents are prohibited from bringing pre-enforcement challenges to state laws that clearly infringe on parents' constitutional rights. *See, e.g.,* App.2a-27a (dismissing the case of parents who challenged a law permitting shelters to hide information about their children and facilitate gender transition without parental permission or knowledge); Parents *Protecting Our Children v. Eau Claire Area Sch. Dist.*, 95 F.4th 501 (7th Cir. 2024) (dismissing the case of parents who challenged a policy that provided resources to schools

---

[3] *See also* Kenneth Schrupp, *California mother says daughter killed herself after being transitioned by school*, The Center Square (Sept. 10, 2025), https://perma.cc/HEJ9-T9QY.

who had students struggling with gender identity and prevent parents from obtaining information about their child's plan for lack of standing); *John & Jane Parents 1 v. Montgomery Cnty. Bd. of Educ.*, 78 F.4th 622 (4th Cir. 2023) (dismissing the case of parents who challenged guidelines that allowed schools to provide a gender support plan without their parents' knowledge for students who wanted to transition for lack of standing); *but see Deanda v. Becerra*, 96 F.4th 750 (5th Cir. 2024) (holding that a parent had standing to bring a challenge to Title X, which funded programs that offered contraceptives to minors without parental consent—despite his children never receiving contraceptives from such a program). A circuit split has developed pertaining to pre-enforcement challenges and parents' constitutional rights to direct the upbringing of their children.

As it stands in the Ninth Circuit, parents are required to wait until their child runs away or transitions genders to have standing to challenge a state law that clearly infringes their constitutional rights—and then it may be too late, as Ms. Martinez experienced. When courts prevent parents from filing a case at all, especially when core constitutional rights are at stake, those rights dwindle to paper promises. The case here is a clean, straightforward vehicle for the Court to address the issue of pre-enforcement challenges for citizens whose parental rights are being violated. The Court should grant the petition for certiorari.

ARGUMENT

I. Pre-enforcement challenges are at the core of Americans' ability to defend their constitutional rights against unjust laws.

The current framework of standing doctrine, if allowed to stand in the Ninth Circuit and other circuits, requires parents to wait until their child runs away, undergoes irreversible gender-transition treatments, or potentially even commits suicide, as in Ms. Martinez's case, before obtaining standing. This is an unconscionable barrier to constitutional vindication. Unlike some constitutional violations that can be remedied after the fact, the harms at issue here are often irreversible. Pre-enforcement challenges represent a cornerstone of constitutional protection, particularly where fundamental rights like parental authority and free exercise of religion are at stake. Requiring parents to wait until their children suffer irreversible consequences before obtaining standing violates both the letter and spirit of constitutional standing doctrine.

Parents facing laws that restrict their fundamental right to direct their child's upbringing—including the parent plaintiffs here—have demonstrated the concrete, particularized, and imminent injury necessary for standing along with the credible threat of future harm that justifies pre-enforcement review. The alternative framework which several circuits have adopted effectively nullifies constitutional protection by conditioning access to federal courts on irreversible harm to the

parent-child relationship and potentially even to children themselves, as in Ms. Martinez's case.

The Fifth Circuit correctly recognized in *Deanda* that a parent's challenge to policies affecting parental rights constituted a concrete interest even when the harm may be intangible. 96 F.4th at 758. The Court itself has "confirmed in many [] previous cases that intangible injuries can nevertheless be concrete." *Spokeo, Inc. v. Robins*, 578 U.S. 330, 340 (2016). The Fifth Circuit acknowledged that the parent's injuries were concrete and the "allege[d] injuries to his religious exercise and parental rights [] [had] perennially been honored by American courts." *Deanda*, 96 F.4th at 758.

In stark contrast to the Fifth Circuit, the Ninth Circuit requires that parents wait until their children run away or undergo gender transition before obtaining standing. As Judge VanDyke recognized in his dissent from denial of rehearing en banc, "the real harm to parents from Washington's legal regime happens long before a child runs away." App.44a. "Such an intentional interference with the parent-child relationship, be it direct or indirect, creates an injury to the fundamental right to parent." App.44a-45a. Not only that, but once a child has run away or undergone medical transition procedures, the parental relationship and the child's physical condition are damaged beyond repair. The Ninth Circuit's decision represents a dangerous departure from established precedent that threatens to eviscerate parental rights by creating an impossible catch-22: parents cannot bring facial challenges to laws that interfere with their fundamental rights

until those rights have already been violated, irreversibly in many cases.

The tragic case of Abigail Martinez illustrates the devastating consequences of this restrictive approach. Her daughter was removed from her home based on false abuse allegations which government officials helped to fabricate, placed in state custody, and ultimately died by suicide after the state facilitated her gender transition against her mother's religious convictions. By the time Ms. Martinez could challenge the system, it was too late to save her daughter.

The Ninth Circuit's approach contradicts established precedent that "[a]n allegation of future injury may suffice if the threatened injury is 'certainly impending,' or there is a 'substantial risk that the harm will occur.'" *Susan B. Anthony List v. Driehaus*, 573 U.S. 149, 158 (2014) (quoting *Clapper v. Amnesty Int'l USA*, 568 U.S. 398, 409, 414, n.5 (2013)). The Court has held that "where threatened action by *government* is concerned, we do not require a plaintiff to expose himself to liability before bringing suit to challenge the basis for the threat—for example, the constitutionality of a law threatened to be enforced." *MedImmune, Inc. v. Genentech, Inc.*, 549 U.S. 118, 128-29 (2007). Under this precedent, the parents in this case should have the right to challenge the constitutionality of Washington's statutes before their children are harmed by its enforcement.

The Ninth Circuit's decision represents a fundamental misunderstanding of both standing doctrine and the nature of constitutional rights. Pre-enforcement challenges serve as essential safeguards that allow citizens to vindicate their constitutional

rights before suffering irreparable harm. When fundamental rights are at stake—particularly the sacred relationship between parents and their children—courts must not erect insurmountable barriers that effectively nullify constitutional protections by requiring citizens to suffer irreversible harm before seeking relief.

II. The Free Exercise Clause protects parents' rights to direct the "religious upbringing" of their children.

These parents' pre-enforcement challenge cannot be separated from the constitutional issues at stake. They alleged a concrete injury. As Judge VanDyke recognized in his dissent, "The very existence of a state regulatory regime that encourages and facilitates the transition of children without the consent of their parents presently interferes with the protected parent-child relationship by subverting a parent's authority to direct the upbringing of her child." App.44a. These statutes directly undermine "the fundamental right of parents to make decisions concerning the care, custody, and control of their children." *Troxel v. Granville*, 530 U.S. 57, 66 (2000).

Parental rights are closely linked with free exercise rights and are especially strong for religious families seeking to teach their faith to the next generation. As far back as William Blackstone in the 1700s, scholars have recognized that parents have the right to raise their children, which includes delegating authority to others. As this Court echoed in *Pierce v. Society of Sisters of the Holy Names of Jesus and Mary*, "The child is not the mere creature of the State; those who nurture him and direct his destiny have the

right, coupled with the high duty, to recognize and prepare him for additional obligations." 268 U.S. 510, 535 (1925). Parents have both the right and the duty to raise their children in accordance with their beliefs and conscience. However, Washington is directly infringing upon parental rights by permitting state-run shelters to secretly house and facilitate the transition of minors to a different gender without the knowledge or consent of their parents.

This Court has held that the Free Exercise Clause "does perhaps its most important work by protecting 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). The parents in this case are seeking to raise their children in accordance with their conscience. Two sets of parents in this case, like Ms. Martinez, are Christians.[4] App.74a, 76a. The Ninth Circuit denied these parents who have children struggling with gender dysphoria the right to bring their case because they allegedly had not shown enough injury for standing. The Ninth Circuit refused to even examine the merits of the case. However, Judge VanDyke's

[4] Although the issue on appeal is one of standing, the parents originally brought a free exercise claim. This Court made clear in *Yoder* and *Mahmoud* that parental rights are inextricably linked with the Free Exercise Clause and thus, strict scrutiny should apply whenever schools impose a burden of the "special character" as in *Yoder*. *Mahmoud*, 606 U.S. at 565. Constitutional rights are often intertwined. *See, e.g., Sause v. Bauer*, 585 U.S. 957, 959 (2018) (finding that "First and Fourth Amendment issues may be inextricable" where officer ordered woman to stop praying); *Kennedy*, 597 U.S. at 523 (finding that Free Exercise Clause and Free Speech Clause provide "overlapping protection for expressive religious activities.").

dissent pierced the heart of the case: "Is our court's position really that, in such a hypothetical, a parent must first have a dead child before it could sue? . . . And what a perverse incentive we have now created in parental rights cases: only those parents willing to first subject their child to irreparable injury can ever have their day in court." App.48a. Ms. Martinez's case is a tragic example of Judge VanDyke's point—after her daughter died, it was too late for Ms. Martinez to seek any meaningful remedy.

Courts have consistently recognized the link between parental rights and free exercise rights in the context of public-school policies, especially regarding religious families. The Free Exercise Clause undeniably protects families seeking to raise their children in accordance with their religious beliefs. *See Yoder*, 406 U.S. at 214 (parental rights regarding religious upbringing are "specifically protected by the Free Exercise Clause" . . . "[l]ong before . . . universal formal education"). *Yoder* described the Court's holding in *Pierce* "as a charter of the rights of parents to direct the religious upbringing of their children." 406 U.S. at 233. The Court directly connected parental rights and religious beliefs: "the duty to prepare the child for additional obligations . . . must . . . include the inculcation of moral standards, [and] religious beliefs." *Id.* (cleaned up).

Not only does the First Amendment protect parents' freedom to teach their faith to their children, but for many, including Ms. Martinez and the parents in this case, this obligation is at the core of the parents' own religious exercise. The case of these

parents implicates the religious rights of millions of Americans from different faith backgrounds.

Religions from diverse cultures and geographic regions assert—as they have for millennia—that sex is an objective, binary category that cannot be changed by self-perception or medical intervention.[5] Millions of Christians worldwide hold to this belief. Catholic teaching makes clear that "[e]veryone, man and woman, should acknowledge and accept his sexual identity" and that "[p]hysical, moral, and spiritual difference and complementarity are oriented toward the goods of marriage and the flourishing of family life."[6] The Orthodox Church of America teaches that "[o]ur sexuality begins with our creation," and "[t]he Bible says 'Male and female He created them' (Gen. 1:27)."[7] Within the Protestant tradition, most denominations believe the Bible's teaching that God created humans male and female in His image, and that this reality cannot be changed based on perceived gender identity. These denominations include but not limited to the Anglican Church, Assemblies of God, the Church of God in Christ, the Lutheran Church, the Presbyterian Church in America, and Southern

---

[5] *See, e.g.*, Christopher Yuan, *Gender Identity and Sexual Orientation,* The Gospel Coalition, https://perma.cc/S6U5-VWNT.

[6] Catholic Catechism, No. 2333, https://perma.cc/V4WE-24UW.

[7] *"In the Beginning…": Healing our Misconceptions*, Orthodox Church of America, https://perma.cc/3Z43-TUB8 (quoting *Genesis* 1:27).

Baptists.[8] For millions of Christians, "[p]arents are to teach their children spiritual and moral values and to lead them, through consistent lifestyle example and loving discipline, to make choices based on biblical truth."[9]

But these religious beliefs are not just the province of Catholics and Protestants. Sacred texts that define beliefs on marriage, sexuality, chastity, and sex as binary (male and female) also include the Quran,[10] Hadith,[11] the Torah,[12] and the Book of Mormon.[13] The First Amendment provides robust protection for religious believers who adhere to these faiths, as well as for individuals who do not participate in a specific religious tradition but who hold sincere religious

---

[8] For a complete list of sources, *see* First Liberty Institute, *Public Comment on Section 1557 NPRM* (Oct. 3, 2022), at 4-9, https://perma.cc/97NU-VCMZ (detailing religious beliefs of 20 faith groups on sex and gender).

[9] Baptist Faith and Message (2000), https://perma.cc/FRX2-QQG5.

[10] *Marriage in Islam*, Why Islam? Facts About Islam (March 5, 2015), https://perma.cc/UX7Y-87UN; *Women are the Twin Halves of Men*, Observer News Service (March 9, 2017), https://perma.cc/P7JC-R7BH.

[11] Dr. Sikiru Gbena Eniola, *An Islamic Perspective of Sex and Sexuality: A Lesson for Contemporary Muslims*, 12 IOSR JOURNAL OF HUMANITIES AND SOCIAL SCIENCE 2 (2013), at 2028, https://perma.cc/5LWK-BZRA.

[12] *Issues in Jewish Ethics: Homosexuality*, JEWISH VIRTUAL LIBRARY, https://perma.cc/D7EU-DZAN.

[13] *The Family: A Proclamation to the World,* The First Presidency and Council of the Twelve Apostles of The Church of Jesus Christ of Latter-day Saints, https://perma.cc/A2Z3-GUSH.

beliefs about the body, sexuality, marriage, and gender. *See Thomas v. Rev. Bd. of Ind. Emp. Sec. Div.*, 450 U.S. 707, 714 (1981).

The confluence of gender transition and parental rights is a contentious issue in today's society. Parents all over the country are challenging gender transition policies. *Littlejohn v. Sch. Bd. of Leon Cnty.,* No. 23-10385 (11th. Cir. 2025), *petition for cert. filed,* No. 25-259 (parents challenged school's facilitation of child's social gender transition); *Foote v. Ludlow Sch. Comm.*, 128 F.4th 336 (1st Cir. 2025), *petition for cert. filed*, No. 25-77 (parents challenged school committee policy that required staff to use student's requested gender pronouns without notifying parents); *see also Parents Protecting Our Children, UA v. Eau Claire Area Sch. Dist.*, 95 F.4th 501 (7th Cir. 2024), *cert. denied*, 145 S. Ct. 14 (parents challenged school district's policy of concealing students' gender identity transitions from parents); *John and Jane Parents 1 v. Montgomery Cnty. Bd. of Educ.*, 78 F.4th 622 (4th Cir. 2023), *cert. denied*, No. 23-601 (parents challenged a county board of education's guidelines for "gender identity support" plans for students); *Lee v. Poudre Sch. Dist. R-1*, 135 F.4th 924 (10th Cir. 2025), *cert. denied*, No. 25-89 (parents sued after teacher secretly invited their daughter to Gender and Sexualities Alliance meeting); *Lavigne v. Great Salt Bay Comm. Sch. Bd.*, 146 F.4th 115 (1st Cir. 2025) (mother sued when school board gave chest binder to her daughter and referred to her at school by different name and pronouns without informing her mother). Courts have struggled with which standard to apply, often deciding these cases on procedural grounds instead of reaching the merits. Yet these cases are only the tip

of the iceberg, and they will surely keep coming unless this Court provides clarity.

Children's most sensitive questions regarding identity and personhood, which are heavily implicated by religion, clearly fall outside the scope of government authority. Shelters should be prohibited from hiding information about minor children from their parents. For more than a century, this Court has prohibited governmental interference with the rights of parents to direct their children's upbringing. *See Pierce*, 268 U.S. at 534-35; *Meyer v. Nebraska*, 262 U.S. 390 (1923); *Yoder*, 406 U.S. at 218. Petitioners here have a fundamental right to guide their children through their most difficult struggles in a way that aligns with the parents' faith and conscience, and the state must be held accountable for actively hiding information about children from their parents.

III. *Mahmoud* requires reversal here.

The Court recently held that a school board was required to provide parents with advance notice when it read "LGBTQ+ inclusive" books to children because parents had a free exercise right to opt their children out of receiving such instruction. *Mahmoud*, 606 U.S. at 546. If schools are required to provide parents notice when teachers are reading a book about LGBTQ+ individuals, how much more vital it is that parents receive notice when their own children are considering gender transition or have run away from home.

When a student attempts to transition to a different gender, this decision has life-long consequences. It personally affects the student with irreversible consequences to the student's physical

body, mental state, future life and health, and ability to bear children. Social transition (which includes changing names and pronouns), is a significant medical intervention that makes minors more likely to persist in gender dysphoria, especially when that step is affirmed by adults in authority roles.[14] Beyond that, such decisions also affect the entire family. Ms. Martinez and her family endure a constant state of grief after Yaeli's suicide. For the parents in this case, their family relationships will never be the same because of Washington's statutes that further minors' gender transitions without parental knowledge or consent.

What parents and children believe about gender and sexuality is at the heart of many religious denominations' teachings. Millions of parents, like the parents in *Mahmoud*, "believe they have a 'sacred obligation' or 'God-given responsibility' to raise their children in a way that is consistent with their religious beliefs and practices." 606 U.S. at 547. Parents do not just have the "right to teach religion in the confines of one's owne home[,]" but such a right "extends to the choices that parents wish to make for their children outside the home." *Id.* This includes the right for parents to teach their children values in alignment with their religious beliefs, without government officials actively facilitating gender transitions without parental consent.

---

[14] The Cass Review, *Independent Review of Gender Identity Services for Children and Young People* 158 (Apr. 2024); *see also* Dr. Andre Van Mol, *Social Transitioning is Neither Neutral nor Benign*, Christian Medical & Dental Association (Jan. 9, 2025), https://perma.cc/B57E-RXXR.

Here, Washington's statute and practice of excluding parents from sensitive decisions about their children's physical and mental health interferes with religious exercise in multiple ways: (1) shelters are now permitted to hide minor students as young as 13 without their parents' knowledge, and (2) shelters are not required to seek parents' consent or inform parents before encouraging or aiding children in medically transitioning. This statute violates both free exercise rights and parental rights by interfering with religious parents' historically rooted and constitutionally protected ability to raise their children in accordance with their sincere beliefs.

Religion is not relegated only to the home. The First Amendment protects parents' rights to raise their children in accordance with their religious beliefs. Given that parents deserve advance notice and opt-outs when their children receive *teaching* that interferes with their faith, then parents certainly deserve to know when their children are *taking* drastic, life-changing steps with devastating consequences.

CONCLUSION

This Court should grant the petition for certiorari.

Respectfully submitted,

MORIAH O'HARE*
FIRST LIBERTY INSTITUTE
1331 Pennsylvania Ave. NW
Suite 1410
Washington, DC 20004
**Supervised by D.C. bar member*

Counsel for Amicus Curiae

KELLY J. SHACKELFORD
Counsel of Record
JEFFREY C. MATEER
DAVID J. HACKER
JEREMIAH G. DYS
KAYLA A. TONEY
FIRST LIBERTY INSTITUTE
2001 W. Plano Pkwy
Suite 1600
Plano, TX 75075
(972) 941-4444
kshackelford@firstliberty.org

February 17, 2026