No. 23-477

IN THE

Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

JONATHAN SKRMETTI, ATTORNEY GENERAL AND REPORTER FOR TENNESSEE, *et al.*,

Respondents.

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

AMICUS BRIEF OF THE FAMILY ACTION COUNCIL OF TENNESSEE AND TEN OTHER STATE POLICY COUNCILS AS *AMICI CURIAE* IN SUPPORT OF RESPONDENTS

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2 William Blackstone, Commentaries on the Laws of England (1765) 11, 14

INTEREST OF AMICI CURIAE[1]

Amici State Policy Councils are eleven non-profit state policy organizations based in eleven states. Collectively, these State Policy Councils seek to educate citizens and State legislators on public policies that address most closely who we are as human beings. Grounding *Amici*'s policy advocacy is the objective givenness of human nature that has been long-recognized in our constitutional, common-law, and domestic relations traditions. These traditions defer to the society-founding and -preserving institution of the natural family based in the procreative relation and correspondence of persons male and female, a relation of momentous social-cultural consequence. *Amici* organizations are identified in the Appendix to this brief.

Amici support the Tennessee Attorney General and other State defendants in opposition to the Department of Justice's claim that the Equal Protection Clause of the Fourteenth Amendment denies State authority not just to recognize the objective identity of children and protect them from harms in their vulnerable minority, but to hold onto the orienting precepts central to our legal tradition itself.

SUMMARY OF THE ARGUMENT

The State of Tennessee enacted the challenged statute to protect the children within its borders who do

1. Pursuant to Rule 37.6, the undersigned certifies that no counsel for a party authored any part of this brief, and no person other than *amici*, their members, or their counsel made a monetary contribution intended to fund its preparation or submission.

not have the maturity to comprehend the life-altering gravity of being subjected to novel surgical and chemical interventions that irreversibly disrupt and alter their healthy bodies. Medical professionals impose these interventions upon a child for the specific purpose of overcoming the natural processes and characteristics unique to a child's physiology as male or female, and thereby exploit and perpetuate (rather than correct) the child's transient though profound confusion about who he or she is subjectively, as person, in relation his or her objective sexed identity.

The contest in this case thus raises questions as to whether there is a human nature, whether male and female are objective conditions of identity that State law may recognize, and whether the State may protect vulnerable children within its borders from the medical manipulation of persons' sexed bodies in furtherance of a denial of any given human nature.

In sum, the fundamental issue for this Court is not "whether the Constitution is neutral about legislative regulations of new and potentially irreversible medical treatments for minors," *L.W. v. Skrmetti*, 83 F.4th 460, 472 (6th Cir. 2023), but whether States may refuse the novel proposal by some in society that a child is a blank construct for self-definition and medical manipulation and may also refuse the consequences to law and society that will come once such a radical departure from an objective human nature and historic community precept and embedded in our nation's jurisprudence is made normative.

It is an historic juridical baseline that the law is to countenance and address aright the persons for whom it

is designed. Justinian's venerable *Corpus Juris Civilis* in the Digest offers that "since all law is made for the sake of human beings, we should speak first of the status of persons." DIG. 1.5.2. And from Justinian's Institutes: "Knowledge of law amounts to little if it overlooks the persons for whose sake law is made." J. INST. 1.2.12. Indeed, the concept of health itself vanishes from the law's apprehension of health if it can no longer recognize a pre-existing and given human nature by which conformity to or deviation from wholeness and integrity can be judged.

The aberrant contemporary suggestion that the Equal Protection Clause requires judges to abolish nature from jurisprudence so that the individual may self-construct, is an invitation to incoherence—conceptual, legal-political, and anthropological. Professor David Crawford observes:

> If juridical forms and civil institutions are not to be alienating and fragmenting, they need to *anticipate and support* the concrete person *as he really is*, rather than a hypothetical and denatured person. As such, the juridical forms and civil institutions embodying legal justice must presuppose in their structure, meaning, and ends, the familial person and the human justice he or she represents and aspires to. The family is the "foundation of justice" and is antecedently organic to society, in the sense that it informs the nature of the person who is or should be presupposed by those institutions.[2]

2. David Crawford, *Recognizing the Roots of Society in the Family, Foundation of Justice*, 34 COMMUNIO 379, 401 (Fall 2007) (emphasis added).

Accordingly, *Amici* herein offer the Court two points of consideration. First, the central claim of the Department of Justice is not one that can be properly comprehended by the Court if it is confined to the narrow boundaries of a dispute about a generic "right to medical treatment." To be sure, the claim presents in a medical context, but the claim to a "medical treatment" is, at best, a proxy argument for—and more importantly, offered as a distraction from—the far more encompassing dispute over the anthropological and legal disruption implicated in transgender theory and its policy proposals. The Department's claim implies and facilitates much more than the medical maltreatment of children; it forecloses the law's authority to acknowledge the objective physical identity of persons. Just as the Tennessee statute under consideration does something more than prohibit the disordering of children's' healthy bodies by medical professionals: it serves to instantiate, and thus reiterate and hold steady, the law's proper and vital recognition of an objective sexed human nature.

Second, the centuries-enduring and constitutionally foundational common-law legal precepts that authorize and inform State police-power authority stand firmly opposed to any claim that states, as common law jurisdictions, must permit a state-licensed health care provider to permanently injure a child. This novel constitutional principle would deprive all fifty States of their historic police power to protect the vulnerable from physical harm.

ARGUMENT

I. The sex-assailing medical manipulation and sterilizing of children presents a sui generis category for legal analysis, not a generic instance of "medical care."

The medical interventions being proffered to confused children and anxious parents that the Tennessee statute forbids are not properly evaluated as a mere question of "medical care" administered to a child. Instead, these life- and health-altering interventions affecting a child's procreative capacity stand as a sui generis category of endeavor for several reasons.

First, instead of restoring diseased bodies to health, the prohibited conduct attacks healthy bodies to halt or destroy natural physiological processes and to remove or destroy healthy tissues and organs. This sort of endeavor is "medicine" only in the sense that doctors, scalpels, and drugs are involved.

Second, the startling emergence from nowhere of children claiming a cross-sex identity is patently a cultural rather than medical development. "[T]he concept of gender dysphoria *as a medical condition*[3] is relatively new." *L.W.*, 83 F.4th at 472 (emphasis added). So also is the pharmaceutical industries' exploitation of it, which enrolls credulous children into the deceit of sex-change and the permanent harms attending that futility.

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3. It was "[i]n 1980, the American Psychiatric Association first classified gender dysphoria as a medical condition." *L.W.*, 83 F.4th at 466.

Third, the conduct the statute forbids is a renunciation of the reality and significance of the sex binary, thus casting doubt on all human social and legal order. This is not garden-variety "medical treatment."

While the appellate court below largely shaped its Equal Protection analysis in terms of the controversial and contested nature of the medical treatment issues,[4] "age," and "sex,"[5] the Court's Opinion also evinces at points an awareness that the experimental character of pediatric hormone manipulation does not exhaust the scope of relevant concern.

For instance, in considering the claim that the claimants constituted a suspect class for equal protection purposes, the appellate court said:

> Regulation of treatments for gender dysphoria poses fraught line-drawing dilemmas, not unlike the problem facing regulations premised on wealth, age, and disability, including laws designed to allocate benefits on these grounds. Plenty of challenges come to mind in the context of medical treatments for childhood gender dysphoria. Counseling versus drugs.

4. "Life-tenured federal judges should be wary of removing a vexing and novel topic of medical debate from the ebbs and flows of democracy by construing a largely unamendable Constitution to occupy the field." *L.W.*, 83 F.4th at 471.

5. The appellate court considered the law only "as premised on age, medical condition, or sex," *L.W.*, 83 F.4th at 479, without regard to any historical juridical baseline for an equal protection analysis. *Id.* at 471 (noting that the claimants "do not argue that the original fixed meaning of the due process or equal protection guarantees covers these claims").

> Puberty blockers versus hormone treatments. Hormone treatments versus surgeries. Adults versus minors. One age cutoff for minors (16) versus another (18). And that's just the line-drawing challenges that accompany treatments for gender dysphoria. What of other areas of regulation that affect transgender individuals? Bathrooms and locker rooms. Sports teams and sports competitions. Others are sure to follow."

L.W., 83 F.4th at 486.

When the "treatment" options for the diagnosed condition include "counseling," admission to cross-sex sports participation, or a person's access to bathrooms designated for the opposite sex, the true nature of the alleged "medical condition" comes into view. It is unique to gender-identity health proposals that medical treatment and social reorganization are conflated. Counseling and rearranging social institutions are not viable treatment options applied to, for example, cancer, heart disease, blood clots, and cataracts patients. Such remedies are uniquely applied only to transgender-identifying patients. And conversely, physically disruptive hormone and surgical interventions are not otherwise legal uses of medical powers when applied to persons with healthy bodies. Only for transgender-identifying patients.

In this context, the appellate court understandably alluded to "innovative, and potentially irreversible, medical treatments for children," *L.W.*, 83 F.4th at 471, "confronting evolving social norms" *Id.* at 487—a coupling inapplicable to actual medical care like suturing or dialysis. The Tennessee statute is not interfering with garden-variety medicine, and thus should not be

considered in those terms as urged by the Department of Justice.

It is a mistake to assign decisive *legal* authority to a cadre of *medical* witnesses, or to defer to medical organizations with vested interests whose expertise resides only in the realm of technique—not in insight on decisive jurisprudential and juridical considerations such as human nature, Anglo-American juridical polestars, and civilizational predicates—all of which are implicated in the Department's arguments.

This Court's decision in *Dobbs v. Jackson Women's Health Org.*, 597 U.S. 215 (2022), is instructive. In *Dobbs*, prominent medical associations lined up as *amici curiae* to urge upon the Supreme Court the proposition that "laws regulating abortion should be . . . supported by a valid medical or scientific justification" and that "there is no medical or scientific justification for" the Mississippi abortion law.[6] The Court clearly rejected the proposal

6. Brief of Amici Curiae American College of Obstetricians and Gynecologists, American Medical Association, American Academy of Family Physicians, American Academy of Nursing, American Academy of Pediatrics, American Association of Public Health Physicians, American College of Medical Genetics and Genomics, American College of Nurse-Midwives, American College of Osteopathic Obstetricians and Gynecologists, American College of Physicians, American Gynecological and Obstetrical Society, American Medical Women's Association, American Psychiatric Association, American Society for Reproductive Medicine, Association of Women's Health, Obstetric and Neonatal Nurses, Council of University Chairs of Obstetrics and Gynecology, GLMA: Health Professionals Advancing LGBTQ Equality, North American Society for Pediatric and Adolescent Gynecology, National Medical Association, National Association of Nurse Practitioners in Women's Health, Society for Academic Specialists

in medical organizations' brief that the *legal* evaluation of Mississippi's law should be delimited by "medical or scientific justification[s]" which would remove from consideration the fact that the "medical procedure" at issue, which terminates a human life, had been a crime in Anglo-American law for uninterrupted centuries until the divergence of *Roe v. Wade*.

Similarly, in Tennessee's case and as the appellate court recognized, the constitutional point is not resolved by the opinions of some number of medical organizations. These organizations have no legitimate claim to unique insight on the implications of a constitutional mandate nullifying State authority to protect children from avant-garde medical impositions that pertain to the historic common law duty of states to protect the "absolute right" at common law of all persons to the "legal and uninterrupted enjoyment of his life, his limbs, his body, his health, and his reputation." 1 William Blackstone, Commentaries on the Laws of England *129 (1765).

Moreover, medical experts offer no insight into protecting the law itself from losing domestic relations categories that have marked human social organization through all time. This is no small matter. The fateful constitutionalizing of transgender theory as urged by the Department of Justice implies, in principle, the

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in General Obstetrics and Gynecology, Society of Family Planning, Society of General Internal Medicine, Society of Gynecological Oncology, and Society of OB/GYN Hospitalists, *Dobbs v. Jackson Women's Health Organization*, No. 19-1392, Supreme Court of the United States, https://www.supremecourt.gov/DocketPDF/19/19-1392/193074/20210920174518042_19-1392%20bsacACOGetal.pdf

*de*constitutionalizing of the natural family itself with its pre-political grounding and authority.

> Once male or female embodiment no longer legally anchors human identity, the venerable practices and policies dependent on the identity-profundity of male and female bodies only survive as fugitives, or in a tentative position of contingent government permission, ever-vulnerable to the in-fact erasure already accomplished in principle. So, for instance, draining legal meaning from body and its natural functions correspondingly drains legal weight from the body-concepts of motherhood, fatherhood, kinship and ancestry—from family itself.[7]

> Parental authority, for example, grounded in the common law understanding of the person, does not survive transgenderism, as the predicates of each are antithetical. Once existing legal-anthropological categories of human meaning are overthrown, the category of parent (and the martial relationship) itself falls victim to the achievement.[8] These kinds

7. Jeff Shafer, *Supreme Incoherence: Transgender Ideology and the End of Law* (March 28, 2017), www.firstthings.com/web-exclusives/2017/03/supreme-incoherence-transgender-ideology-and-the-end-of-law

8. The disregard in law of objective anthropological verities pertaining to the sex-categories of persons that lies at the heart of transgender ideology was *de facto* repudiated in *Obergefell v. Hodges*, 576 U.S. 644 (2015). The decision of the Court in this case must not provide a principle by which the anthropological legal error made in that case can be extended beyond marital relations established by positive law civil licensing schemes.

> of legal considerations are quite outside the reach of expert opinion on (for instance) a child's endocrine system.

This Court should refuse the incredible suggestion that the life or biological sciences[9] answers the legal question before it, and thus removes from consideration those matters of human nature that have ever and always informed, and inescapably been implicated in, legal and constitutional determinations. *See, e.g.*, *Scott v. Sanford*, 60 U.S. 393, 404-05 (1857) (the question of constitutional "citizens" turning on the fact that slaves and descendants of slaves "were at that time"—the adoption of the U.S. Constitution –were "considered as a subordinate and inferior class of beings, who had been subjugated by the dominant race").

II. The claim that the Equal Protection Clause requires states to permit injuries to the bodies of minor children violates the Equal Protection Clause.

A. Introduction

In terms of our history and legal tradition, it cannot seriously be maintained that a physician can intentionally jeopardize or injure a child's procreative physiology or commission removal of healthy anatomy. This Court has spoken unequivocally regarding the protection of the laws

9. *Cf.* 2 *Blackstone's Commentaries* at *2 ("[W]hen law is to be considered not only as a matter of practice, but also as a rational science, it cannot be improper of useless to examine more deeply the rudiments and grounds of these positive constitutions of society."). The Court should reject the invitation by the Department of Justice to confuse the nature and grounds of the two different sciences.

against injuries to a person: "The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws, whenever he received an injury. One of the first duties of government is to afford that protection." *Marbury v. Madison*, 5 U.S. 137, 163 (1803). For the reasons set forth below, nothing in the Fourteenth Amendment prohibits a state from protecting all persons from injuries to their bodies and natural health and from enforcing the duty of persons not to commit such injures.

B. The Fourteenth Amendment did not abrogate the common law understanding of the fundamental rights and duties of persons relative to personal injuries and the state's duty to protect the former and enforce the latter.

The interpretation of the Fourteenth Amendment as a constitutive part of the U.S. Constitution must be "centered on constitutional text and history." *N.Y. State Rifle & Pistol Assn. v. Bruen*, 597 U.S. 1, 22 (2022) (construing the Second Amendment). There is nothing new in that observation. *See Smith v. Alabama*, 124 U.S. 465, 478 (1888) ("The interpretation of the Constitution of the United States is necessarily influenced by the fact that its provisions are framed in the language of the English common law, and are to be read in the light of its history."); *South Carolina v. United States*, 199 U.S. 437, 449 (1905) ("in interpreting the Constitution we must have recourse to the common law"). Indeed, U.S. Supreme Court Justice Joseph Story wrote that "[t]he whole Structure of our present jurisprudence stands upon the *original foundations* of the common law," Commentaries on the

Constitution of the United States § 157 (1833) (emphasis added), and it is the legal "nomenclature of which the framers of the Constitution were familiar." *Minor v. Happersett*, 88 U.S. 162, 167 (1874).

At common law, persons were "divided by the law into either natural persons, or artificial. Natural persons are such as the God of nature formed us; artificial are such as are created and devised by human laws for the purposes of society and government, which are called corporations or bodies politic." 1 Blackstone's *Commentaries* at *123. Nothing in the text or history of the Fourteenth Amendment remotely implies that this understanding of persons and their rights and the duties was abrogated, particularly as such relates to the protection of a person's limbs and body from physical injury.

The Tennessee legislature determined in the declaratory and directory part of the statute at issue "the boundaries of right and wrong," *Id.* at *53, in a way that conforms to and is in accord with the fundamental rights enjoyed by all persons prior to the U.S. Constitution's ratification, and retained by the people expressly through the Fifth, Ninth, and Fourteenth Amendments, namely, the absolute rights of "personal security, liberty, and property." *Id.* at *129.

"The right of personal security consists in a person's legal and uninterrupted enjoyment of his life, his limbs, his body, his health, and his reputation." *Id.* This right extends not just to "those limbs and members that may be necessary to a man in order to defend himself or annoy his enemy," but "the rest of his person or body is also entitled, by the same natural right, to security from the corporal

insults of menaces, assaults, beating, and wounding; though such insults amount not to destruction of life or member." *Id.* at *134 (emphasis added). It includes "[t]he preservation of a man's health from such practices as may prejudice or annoy it." *Id.* Thus, "[t]he least touching of another's person wilfully [sic], or in anger, is a battery; for the law cannot draw the line between different degrees of violence, and therefore totally prohibits the first and lowest stage of it; every man's person being sacred, and no other having a right to meddle with it in any the slightest manner." 2 Blackstone's *Commentaries* at *120.

In this juridical context, this Court has said that it "cannot be doubted" that the States' historic police power encompasses and authority to punish self-maiming and suicide. *New York Central R.R. Co. v. White*, 243 U.S. 188, 207 (1917). Justice Field, dissenting in *Munn v. Illinois*, 94 U.S. 113 (1877), expounded on the word "life" in the Fourteenth Amendment by acknowledging

> something more is meant than mere animal existence. The inhibition against its deprivation extends to all those limbs and faculties by which life is enjoyed. The provision equally prohibits the mutilation of the body by the amputation of an arm or leg, or the putting out of an eye, or the destruction of any other organ of the body through which the soul communicates with the outer world. The deprivation not only of life, but of whatever God has given to everyone with life, for its growth and enjoyment, is prohibited by the provision in question, if its efficacy be not frittered away by judicial decision.

Id. at 142. *See, e.g.*, *People v. Clough*, 17 Wend. 351, 352 (N.Y. Sup. Ct. 1837) (citing common law sources as to the crime of maiming and mayhem, as implicated in amputating appendages).

In the same vein is the Supreme Court's observation in *Skinner v. Oklahoma*, 316 U.S. 535, 536 (1942), of "a right which is basic to the perpetuation of a race — the right to have offspring." The Court then expounded on this right in relation both to the individual and society:

> We are dealing here with legislation which involves one of the basic civil rights of man. Marriage and procreation are fundamental to the very existence and survival of the race. The power to sterilize, if exercised, may have subtle, far-reaching and devastating effects. In evil or reckless hands it can cause races or types which are inimical to the dominant group to wither and disappear. There is no redemption for the individual whom the law touches. Any experiment which the State conducts is to his irreparable injury. He is forever deprived of a basic liberty.

Id. at 541. Here the Court demonstrates how awareness or discernment of truths about human nature indelibly attends and directs legal analysis. Again, the law must deal with persons as they are. Protecting healthy children from possible sterilization by medical personnel is not prohibited by but is consistent with the protection of all that constitutes human life in the Equal Protection Clause and as reflected in the absolute right at common law right of "personal security."

As persons have a right not to be bodily injured by third persons, physicians like all other third persons have a *corresponding* duty in their practice not to injure the bodies of the persons who are their patients. The jurisdiction of States to regulate the practice of medicine to protect the health of its citizens has been recognized since adoption of the Fourteenth Amendment. *See, e.g.*, *Jacobson v. Massachusetts*, 197 U.S. 11, 25 (1905) (acknowledging the state's authority over public health, quoting *Ogden v. Utah*, 22 U.S. 1, 203 (1824), that "health laws of every description" were left to the powers of the state and "[n]o direct general power over these objects is granted to Congress; and, consequently, they remain subject to state legislation.").

Therefore, the Court must reject the ahistorical innovation in law offered by the Department of Justice that the Fourteenth Amendment's Equal Protection Clause abrogated the right of all persons to the uninterrupted enjoyment of their bodies and health according to our nature as human beings and the power (and duty) of states to protect the rights of all persons from injury thereto by medical providers.

CONCLUSION

For the foregoing reasons, *Amici* respectfully requests this Court affirm the judgment of the court of appeals.

Dated: October 15, 2024.

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The Family Action Council of Tennessee

Delaware Family Policy Council

Eagle Forum of Alabama

Eagle Forum of California

Idaho Family Policy Center

New Jersey Family Policy Center

Palmetto Family Council (SC)

Tennessee Eagle Forum

Texas Values

The Family Foundation (KY)

The Family Foundation (VA)