

The Alliance Defending Freedom Cited Misleading And Contested Research To Argue In Favor Of Conversion “Therapy” For Minors, In Its Latest Crusade Against LGBTQ+ Rights

SUMMARY:

In the upcoming case *Chiles v. Salazar*, the Supreme Court will hear a challenge to a Colorado law banning conversion practices, which is also known by the misnomer conversion “therapy.” The petitioner is represented by Alliance Defending Freedom (ADF), a conservative Christian legal organization that has been [designated](#) an anti-LGBTQ+ hate group by the Southern Poverty Law Center. The respondents [note](#) that the counselor has not claimed to practice conversion practices as defined by the state law—ADF has a pattern of pushing manufactured cases, like *303 Creative*, where a graphic designer challenged a law based on a fabricated website request from a man who [denied](#) ever making it.

In their briefs, ADF repeatedly refers to conversion practices as “consensual conversations” between a minor and a counselor. But when ADF has sued to prevent transgender minors from using preferred names and pronouns in school, or from receiving gender affirming medical care, the organization has repeatedly [argued](#) that minors were “legally and developmentally incapable of giving informed consent.”

ADF cites a variety of research papers, doctors, and personal anecdotes to support their claims that conversion practices for gender identity or sexual orientation are successful and beneficial. While conservatives have aimed to capitalize on growing anti-trans sentiment by launching a barrage of anti-transgender attacks under the guise of protecting children, the petitioners go even further, attempting to defend long-discredited conversion practices for sexual orientation, too. **These sources include misleading and contested information.**

- The petitioner’s briefs heavily cite the Cass Review, a controversial gender care [report](#) commissioned by the UK’s National Health Service. **The report has faced heavy criticism of [biased research](#), [methodological flaws](#), [“unsubstantiated claims,”](#) and was investigated by the British Medical Association.** Unlike the petitioner, the report does not recommend conversion practices, with the author calling conversion “therapy” an [“unacceptable practice.”](#)
- The petition cites research on gender fluidity from researcher Lisa Diamond, attempting to claim that human sexuality is subject to change, despite Diamond explicitly acknowledging the [potential political manipulation](#) of her research and writing that sexual orientation is not a changeable choice.
- The petition cites Dr. Riittakerttu Kaltiala, a gender dysphoria doctor in Finland, whose patients have [reported](#) concerning treatment, including being misgendered, having their transgender identities invalidated, and the clinic endorsing conversion practices. A brief cites Dr. Nicholas Cummings, a psychologist who purportedly carried out successful conversion practices, but who later [clarified his views](#) that conversion practices could not “cure homosexuality” and were a violation of human rights.

While there has been a growing industry of [paid “experts”](#) to defend anti-trans laws, the respondents [noted](#) that the petitioner “offered no expert declarations or affidavits”—perhaps reflecting an unwillingness for licensed medical providers to defend efforts to change sexual orientation. Instead, the petitioner cited personal anecdotes from a detransitioners forum on Reddit and a [conversion practices advocacy group](#) that promoted the idea that homosexuality stems from sexual trauma. The evidence is clear that conversion practices [do not work](#) and harm LGBTQ+ youth—ADF’s junk “science” cannot hide their anti-LGBTQ+ crusade.

In *Chiles v. Salazar*, The Supreme Court Will Hear A Challenge To Colorado's Law Banning Conversion Practices (A.K.A. Conversion "Therapy") For Minors

May 2025: The Supreme Court Announced It Would Hear A First Amendment Challenge To Colorado's Law Banning Conversion Practices

May 2025: The Supreme Court Said It Would Hear A First Amendment Challenge To A Colorado Law Banning Professional Counseling Services Engaged In Conversion Practices Intended To Change A Minor's Gender Identity Or Sexual Orientation. "The Supreme Court said on Monday that it will hear a First Amendment challenge to a Colorado law banning professional counseling services engaged in conversion therapy intended to change a minor's gender identity or sexual orientation." [New York Times, [3/10/25](#)]

Colorado's 2019 Law Prohibits Licensed Therapists From Performing Conversion Practices To Change An Individual's Sexual Orientation Or Gender Identity. "The challenged law prohibits licensed therapists in Colorado from performing conversion therapy, which it defines to include efforts 'to change an individual's sexual orientation or gender identity.' That includes trying 'to eliminate or reduce sexual or romantic attraction or feelings toward individuals of the same sex.' The law, adopted in 2019, allows treatments that provide 'acceptance, support and understanding.' It exempts therapists 'engaged in the practice of religious ministry.'" [New York Times, [3/10/25](#)]

Alliance Defending Freedom Filed A Petition For A Writ Of Certiorari Days After Trump Won The 2024 Election

Alliance Defending Freedom Filed A Petition For A Writ Of Certiorari Days After Trump Won The 2024 Election

Alliance Defending Freedom (ADF) Is A Conservative Christian Legal Organization And Designated An Anti-LGBTQ+ Hate Group By The Southern Poverty Law Center. "The Alliance Defending Freedom is a so-called 'legal alliance of Christian attorneys' with a history of funding and representing cases targeting LGBTQ people, youth and protections. It is listed as an anti-LGBTQ hate group by the Southern Poverty Law Center, which also notes ADF's efforts against abortion access and that its CEO, Michael Farris, fought equal rights for women. Farris also coordinated efforts to discredit the 2020 presidential election, in which LGBTQ voters were a deciding faction." [GLAAD, [12/4/24](#)]

November 8, 2024: Alliance Defending Freedom Filed A Petition For A Writ Of Certiorari Before The Supreme Court.

No. _____
IN THE
Supreme Court of the United States

KALEY CHILES,

Petitioner,

v.

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

Respondents.

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

PETITION FOR A WRIT OF CERTIORARI

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[Supreme Court, Chiles v. Salazar, Petition for A Writ Of Certiorari, filed [11/8/24](#)]

The Supreme Court Rejected An Appeal Challenging A Similar Law In 2023

In A 6-3 Vote With Kavanaugh, Alito, And Thomas Indicating They Would Have Taken The Case, The Supreme Court Let Stand A Washington State Law Prohibiting Licensed Health Care Professionals From Practicing Conversion Practices Targeting Minors. “The Supreme Court on Monday let stand a Washington state law prohibiting licensed health care professionals from practicing ‘conversion therapy’ – a scientifically discredited practice intended to change a person’s sexual orientation or gender identity – as it applies to minors. [...] The vote was 6-3, with Justices Brett Kavanaugh, Samuel Alito and Clarence Thomas publicly saying they would have taken up the case.” [CNN, [12/11/23](#)]

In Thomas’ Dissent, He Indicated That He Viewed The Law Prohibiting Conversion Practices To Be “Presumptively Unconstitutional” And “Viewpoint-Based And Content-Based Discrimination” Against Counselors. “Under SB 5722, licensed counselors can speak with minors about gender dysphoria, but only if they convey the state-approved message of encouraging minors to explore their gender identities. Expressing any other message is forbidden—even if the counselor’s clients ask for help to accept their biological sex. That is viewpoint-based and content-based discrimination in its purest form. As a result, SB 5722 is presumptively unconstitutional, and the state must show that it can survive strict scrutiny before enforcing it.” [Supreme Court, *Tingley v. Ferguson*, Thomas Dissent, decided [12/11/23](#)]

The Petitioner Did Not Allege She Intended To Practice Conversion “Therapy” As Defined By The State Law, Yet Still Filed A Pre-Enforcement Challenge

The Respondents Noted The Petitioner Had Not Alleged She Intended To Practice Conversion “Therapy” As Defined By The State Law, Yet Still Filed A Pre-Enforcement Challenge

The Petitioner Had Not Received A Complaint Or Faced Disciplinary Action, And Never Alleged She Intended To Practice Conversion “Therapy” As Defined By State Law, But Filed A Pre-Enforcement Challenge. “Petitioner is a licensed professional counselor and a licensed addiction counselor. Neither of the Respondent Boards has received a complaint about Petitioner, much less taken any disciplinary action against her. Petitioner has never alleged that she intends to practice conversion therapy as defined by the MCTL. She nonetheless filed a pre-enforcement challenge in 2022, more than three years after the MCTL took effect.” [Supreme Court, Chiles v. Salazar, Brief in Opposition, [1/6/25](#)]

The Respondents Noted That The Petitioner Failed To Offer Any Evidence That She Intended To Violate The Colorado Minor Conversion Therapy Law (MCTL). “And because Petitioner failed to offer any evidence that she intends to violate the MCTL, she also lacks standing.” [Supreme Court, Chiles v. Salazar, Brief in Opposition, [1/6/25](#)]

ADF Represented A Colorado Woman In An Anti-LGBTQ+ Case Based On An Allegedly Fictional Request For Graphic Design Services For A Same-Sex Wedding

ADF Represented Artist Lorie Smith In A Colorado Case About Creating Websites For Same-Sex Weddings Which Eventually Reached The Supreme Court. “Graphic artist Lorie Smith, who is also from Colorado and also represented by the Alliance Defending Freedom, challenged the same state law in the 303 Creative case that was decided by the U.S. Supreme Court in June. The court’s conservative majority said forcing her to create websites for same-sex weddings would violate her free speech rights.” [Associated Press, [10/3/23](#)]

The Man Who Supposedly Requested Services From Smith Said He Never Submitted A Request, And In Fact Had Been Happily Married To A Woman For The Last 15 Years. “A Colorado web designer who the U.S. Supreme Court ruled Friday could refuse to make wedding websites for gay couples cited a request from a man who says he never asked to work with her. [...] Smith named Stewart — and included a website service request from him, listing his phone number and email address in 2017 court documents. But Stewart told The Associated Press he never submitted the request and didn’t know his name was invoked in the lawsuit until he was contacted this week by a reporter from The New Republic, which first reported his denial. [...] ‘I was incredibly surprised given the fact that I’ve been happily married to a woman for the last 15 years,’ said Stewart, who declined to give his last name for fear of harassment and threats. His contact information, but not his last name, were listed in court documents.” [Associated Press, [7/1/23](#)]

In Its Cert Petition, Alliance Defending Freedom Repeatedly Claimed That Minors Could Consent To Conversion Practices, Creating A Double Standard After Arguing Against Minors’ Ability To Consent To Social Or Medical Transition In Other Cases

The Petitioner And Supporting Amicus Briefs Repeatedly Claimed That Conversion Practices With Minor Patients Was “Consensual”

In The Opening Remarks Of The Cert Petition, ADF Lawyers Claimed That Colorado Banned “Consensual Conversations.” “Kaley Chiles is a licensed counselor who helps people by talking with them. A practicing Christian, Chiles believes that people flourish when they live consistently with God’s design, including their biological sex. Many of her clients seek her counsel precisely because they believe that their faith and their relationship with God establishes the foundation upon which to understand their identity and desires. But Colorado bans these consensual conversations based on the viewpoints they express.” [Supreme Court, *Chiles v. Salazar*, Petition for a Writ of Certiorari, filed [11/8/24](#)]

ADF Lawyers Referred To Youth Conversion “Therapy” Participants As A “Consenting Minor Client.” “Yet it is this desperately needed counseling—encouraging words between a licensed counselor and a consenting minor client—that Colorado forbids with its viewpoint-based Counseling Restriction.” [Supreme Court, *Chiles v. Salazar*, Reply Brief for Petitioner, [1/15/25](#)]

ADF Lawyers Claimed Chiles’ Clients Voluntarily Seek Her Counseling, With Parental Consent, And Are Internally Motivated To Seek Counseling. “Chiles’s individual clients voluntarily seek her counseling and ‘determine the goals that they have for themselves.’ [...] When those clients are minors, she counsels them only if their parents consent and the clients ‘are internally motivated to seek counseling (as opposed to being required to come)’.” [Supreme Court, *Chiles v. Salazar*, Brief for Petitioner, [6/6/25](#)]

ADF Lawyers Argued That “Consent Issues Cannot Explain The Discrepancy Between The State’s Treatment Of Minors And Adults” Because State Law Indicates That Minors Can Consent To Counseling Starting At Age 12. “Consent issues cannot explain the discrepancy between the State’s treatment of minors and adults. Colorado has decided that minors can consent to counseling starting at age 12. Colo. Rev. Stat. § 12-245-203.5; see also J.A.345 (APA claims that ‘adolescents are cognitively able to participate in some health care treatment decisions’). This means that 12-year-olds acting without parental approval may access counseling to affirm a transgender identity, but those same children cannot obtain counseling to realign their identity with their sex, even if their parents support it.” [Supreme Court, *Chiles v. Salazar*, Brief for Petitioner, [6/6/25](#)]

Yet Alliance Defending Freedom Has Repeatedly Argued Against The Power Of Minors To Consent To Social Or Medical Transition

ADF Highlighted A Doctor’s Remarks That Minors Were “Legally And Developmentally Incapable Of Giving Informed Consent” To Social Transition In A Wisconsin Lawsuit

February 2020: Alliance Defending Freedom Attorneys Asked A State Court To Halt A School District Policy That Instructed Staff To Respect Transgender Identities Of Students. “Alliance Defending Freedom attorneys, together with lead counsel from the Wisconsin Institute for Law & Liberty, asked a state court Wednesday to immediately halt a Madison Metropolitan School District policy that instructs school teachers and staff to assist and encourage children of any age in the adoption of transgender identities without parental consent or even notice. The policy even instructs district employees to deceive parents about the gender identity their son or daughter has adopted at school.” [Alliance Defending Freedom, [2/19/20](#)]

Alliance Defending Freedom Amplified Remarks From A Psychiatrist Who Claimed Minors Were “Legally And Developmentally Incapable Of Giving Informed Consent” To Social Transition. “According to an expert affidavit filed by the parents and submitted by Dr. Stephen B. Levine, a Distinguished Life Fellow of the American Psychiatric Association, social transition of children is an experimental therapy that exposes vulnerable children to dangerous, lifelong physical, social, and mental health risks. [...] ‘For a child to live radically different identities at home and at school, and to conceal what he or she perceives to be his or her true identity from parents, is psychologically unhealthy in itself, and could readily lead to additional psychological problems,’ Levine wrote in his affidavit. ‘Extended secrecy and a ‘double life’ concealed from the parents is rarely the path to psychological health. For this reason at least, schools should not support deceit of parents.... Most children are both legally and developmentally incapable of giving informed consent to such a

life-altering intervention. And parents, of course, cannot give informed consent if the fact of their child's wish to assume a transgender identity is concealed from them.” [Alliance Defending Freedom, [2/19/20](#)]

ADF Senior Counsel Stated That Adolescents Were Not Able To Give Consent To Gender Affirming Care While Defending An Alabama Ban

December 2022: ADF Joined The Alabama Attorney General's Office In Defending The State's Ban On Gender Affirming Care For Minors. “So Alliance Defending Freedom has come alongside the Alabama Attorney General's Office to defend the state's law. [...] In April 2022, Alabama passed Senate Bill 184 (SB 184), or the Alabama Vulnerable Child Compassion and Protection Act. SB 184 prohibited the administration of puberty blockers, cross-sex hormones, and surgeries on minors who experience discomfort with their biological sex. These experimental medical interventions can have harmful, lifelong, and irreversible consequences.” [Alliance Defending Freedom, [4/21/25](#)]

ADF Senior Counsel Roger Brooks Stated That Children And Adolescents Were “Not Able To Understand The Long-Term Implications For Their Lives, Or To Give Informed Consent” To Gender Affirming Care. “As ADF Senior Counsel Roger Brooks further comments, ‘Even the far-from impartial World Professional Association for Transgender Health has admitted that the overwhelming majority of children who experience gender dysphoria before puberty will naturally resolve their dysphoria as they mature. And there have been literally no studies of how the large numbers of girls who first report gender dysphoria as teens will develop or recover if they are supported rather than being subjected to likely sterilizing chemicals. Yet activist groups and professionals with large financial interests continue to push harmful puberty-blockers, sterilizing cross-sex hormones, and irreversible surgeries upon children and adolescents who are not able to understand the long-term implications for their lives, or to give informed consent.’” [Alliance Defending Freedom, [4/21/25](#)]

ADF Supported An Iowa Ban By Claiming Young People “Cannot Effectively Consent” To Care

March 2023: ADF Supported An Iowa Bill Banning Gender Affirming Care For Minors, With Senior Counsel Matt Sharp Stating Young People “Cannot Effectively Consent” To Care. “The following quote may be attributed to Alliance Defending Freedom Senior Counsel Matt Sharp, director of the ADF Center for Legislative Advocacy, regarding Iowa Gov. Kim Reynolds’ signing Wednesday of SF 538, a bill that protects children from dangerous, life-altering medical procedures: ‘Denying the truth that we are either male or female hurts real people, especially vulnerable children. By enacting this legislation, Iowa has taken critical steps to protect children from radical activists that peddle gender ideology and pressure children into life-altering, experimental procedures and drugs. Young people deserve to live in a society that doesn’t subject them to risky experiments to which they cannot effectively consent. That’s why other countries—like Sweden, England, and Finland—are adopting policies that better protect children from the bad science that has already devastated countless lives. We commend Gov. Reynolds and the Iowa Legislature for standing for truth by enacting these vital protections for our children.’” [Alliance Defending Freedom, [3/23/23](#)]

ADF Lawyers Repeatedly Cited Scientific Research To Support Their Claims About The Benefit Of Conversion Practices And Importance Of Avoiding Gender Affirming Care, But Much Of That Science Was Controversial, Misleading, Or Misused

The Petition Cited The Controversial Cass Review, A Report On Gender Identity Commissioned By NHS England That Faced Scrutiny For “Methodological Flaws And Unsubstantiated Claims,” In Order To Argue There Was “Unmet Need For Mental Health Services”—Ignoring That The Review Explicitly Denounced Conversion Practices

The Cass Review Is A Report Examining Gender Identity Services For Minors In England Which Found Gender Medicine To Be Operating On “Shaky Foundations”

The Cass Report Looked At Gender Identity Services For Minors In England And Found That Gender Medicine Operated On “Shaky Foundations” When It Came To Medical Intervention. “The Cass report, published on 10 April, looked at gender identity services for under-18s in NHS England. It found gender medicine to be operating on ‘shaky foundations’ when it came to the evidence for medical treatment like prescribing hormones to pause puberty or to transition to the opposite sex. It said: ‘The reality is that we have no good evidence on the long-term outcomes of interventions to manage gender-related distress.’” [BBC, [4/20/24](#)]

Cass Wrote That Medical Professionals Were Afraid Of Being Accused Of Conducting Conversion Practices If They Took A Cautious Or Exploratory Approach To Gender Identity Treatment. “In her review, Cass said professionals supporting young people with gender incongruence or distress were ‘overshadowed by an unhelpfully polarised debate around conversion practices’. She noted that some medics were afraid of being accused of conducting ‘conversion therapy if, again, they take a cautious or exploratory approach’ and some clinicians expressed ‘fearfulness about what colleagues might say if they speak up and express an opinion that is not consistent with theirs’.” [Guardian, [4/11/24](#)]

The Cert Petition Repeatedly Cited The Cass Review To Argue Against Affirming Approaches And For Other Types Of Mental Health Services For “Gender-Questioning Young People”

The Cert Petition Cited The Cass Review’s Finding That There Was Unmet Need For Mental Health Services To Support “Gender-Questioning Young People.” “In jurisdictions with counseling restrictions, many young people cannot receive the care they seek—and critically need. An independent policy review commissioned by the English National Health Service noted the urgent and unmet need for mental health services to support ‘gender-questioning young people.’ The Cass Review, Independent Review of Gender Identity Services for Children and Young People at 202 (Apr. 2024). And it linked this shortage to restrictions like Colorado’s. Such restrictions have ‘left some clinical staff fearful’ of ‘providing professional support’ to young people at all. Id. at 202.” [Supreme Court, Chiles v. Salazar, Petition for a Writ of Certiorari, filed [11/8/24](#)]

The Cert Petition Again Cited The Cass Review To Argue That Gender Affirming Approaches Were Weaponized Into A Medical Pathway, Despite Lack Of Evidence Of Medical Intervention Helping. “Meanwhile, ‘affirmative’ and ‘exploratory’ approaches—the very ones Colorado blesses—have been ‘weaponised [such] that...young person[s]’ feel forced into ‘a medical pathway’—despite the lack of evidence that experimental medical intervention will help. Cass Review at 150.” [Supreme Court, Chiles v. Salazar, Petition for a Writ of Certiorari, filed [11/8/24](#)]

The Cert Petition Cited The Cass Report To Claim That Psychotherapy For Minors Was Overshadowed By An “Unhelpfully Polarised Debate Around Conversion Practices.” “A seminal report commissioned by the English National Health Service concluded that the research on youth transgenderism is ‘an area of remarkably weak evidence.’ Cass Review at 13. It concluded that psychotherapy for minors with gender dysphoria ‘has been overshadowed by an unhelpfully polarised debate around conversion practices.’ Id. at 150. The report recognized that methods like talk therapy can ‘help alleviate [minors]’ distress,’ and that ‘[i]t is harmful to equate this approach to conversion therapy as it may prevent young people from getting the

emotional support they deserve.’ Ibid.” [Supreme Court, Chiles v. Salazar, Petition for a Writ of Certiorari, filed [11/8/24](#)]

The Cert Petition Cited The Cass Review Again, Claiming That People Who Desired “Harmony With Their Bodies” And Sought Counseling Showed Improved Mental Health. “Although more research is needed, recent studies show that those who desire harmony with their bodies and seek counseling find ‘significant improvement’ with depression, anxiety, and suicidality and experience no ‘adverse or negative effects.’ Cass Review at 153.” [Supreme Court, Chiles v. Salazar, Petition for a Writ of Certiorari, filed [11/8/24](#)]

The Cert Petition Cited The Cass Review Again To Argue There Was “Remarkably Weak” Evidence For Pediatric Gender Medicine And To Call For Counseling Options. “There’s an urgent need for counseling for those suffering from issues relating to gender and sexuality. Many have suggested that the answer lies with experimental drugs and surgeries. Yet the most comprehensive assessment of the risks and benefits of pediatric gender medicine to date found ‘remarkably weak’ evidence for the safety and efficacy of this path. Cass Review at 13. That Review instead calls for a cautious, individualized approach to these issues that prioritizes counseling. But counseling cannot happen in the shadow of restrictions like Colorado’s. As the Review noted, such restrictions have ‘left some clinical staff fearful’ of ‘providing professional support’ to young people at all. Id. at 202.” [Supreme Court, Chiles v. Salazar, Petition for a Writ of Certiorari, filed [11/8/24](#)]

Despite The Cass Report’s Claims That Therapists Are Afraid To Discuss Gender Identity With Clients, Colorado’s Law Very Clearly Allows Therapists To Ethically Help Young People Explore Their Identities Without A Pressured “Conversion” Outcome

The Trevor Project Noted That Colorado’s Law “Very Clearly” Included A Clause That Allows Therapists To Help Young People Explore Their Identity Ethically, They Just Cannot Pressure Children Toward A Specific “Conversion” Outcome “Importantly, this law does not apply to non-licensed religious counselors. It also very clearly includes a clause that allows therapists to help young people explore their sexual orientation or gender identity ethically. This is an important distinction: by law, state-licensed therapists are already allowed to help youth explore their identity. They cannot, however, pressure children toward a specific outcome (E.g. promising a gay person that, after counseling, they will ‘no longer be gay’).” [Trevor Project, [8/25/25](#)]

Colorado’s Law Explicitly States That “Conversion Therapy” Does Not Include Treatments That Provide Understanding For An Individual’s Identity Exploration. “(b) ‘Conversion Therapy’ does not include practices or treatments that provide: (i) acceptance, support, and understanding for the facilitation of an individual’s coping, social support, and identity exploration and development, including sexual orientation-neutral interventions to prevent or address unlawful conduct or unsafe sexual practices, as long as the counseling does not seek to change sexual orientation or gender identity” [Colorado House Bill 19-1129, [5/31/19](#)]

The Cass Report Faced Criticism For Methodological Flaws That Warranted Scrutiny On Its Claims, Including From The British Medical Association, Which Launched A Task Group To Investigate The Review

July 2024: The British Medical Association (BMA) Called For A Pause On The Implementation Of The Cass Review’s Recommendations While A Task Group Investigated. “The BMA is to undertake an evaluation of the Cass Review – the independent report on gender identity services for children and young people in the UK, published earlier this year. [...] The BMA is calling for a pause to the implementation of the Cass Review’s recommendations whilst the task and finish group carries out its work. It is expected to be completed towards the end of this year. In the meantime, the BMA believes transgender and gender-diverse patients should continue to receive specialist healthcare, regardless of their age.” [BMA Press Release, [7/21/24](#)]

- **September 2024: The BMA Voted To Retain A Position Of Neutrality Regarding The Cass Review.** “The BMA’s Council of members has voted to confirm the Association will retain a neutral position on the recommendations of the Cass Review of gender identity services for children and young people whilst a BMA task and finish group undertakes its own evaluation.” [BMA Press Release, [9/26/24](#)]

A May 2025 Review Of The Cass Review Found “Methodological Flaws And Unsubstantiated Claims” That “Warrant Critical Scrutiny To Ensure Ethical And Effective Support For Gender-Diverse Youth.”

“Using the ROBIS tool, we identified a high risk of bias in each of the systematic reviews driven by unexplained protocol deviations, ambiguous eligibility criteria, inadequate study identification, and the failure to integrate consideration of these limitations into the conclusions derived from the evidence syntheses. We also identified methodological flaws and unsubstantiated claims in the primary research that suggest a double standard in the quality of evidence produced for the Cass report compared to quality appraisal in the systematic reviews. We discuss these issues in relation to how evidence regarding gender affirming care is framed, the wider political context, and the future for gender affirming care. The Cass report’s recommendations, given its methodological flaws and misrepresentation of evidence, warrant critical scrutiny to ensure ethical and effective support for gender-diverse youth.” [BMC Medical Research Methodology, 25, 128 (2025), [5/10/25](#)]

A Yale Law White Paper Found That The Cass Report Stated Opposition To Conversion Practices But Concerningly Cited Literature Proposing Methods That Claim To Suppress Gender Identity In Minors.

“Studies that claim high rates of ‘desistance’ in children rely on data collected before there was a formal definition for gender dysphoria. Children’s behaviors were classified as ‘gender nonconforming’ if they did not adhere to gender stereotypes. The Review cites such studies uncritically, even though their findings have no relationship to a contemporary understanding of gender. Concerningly, despite stating opposition to so-called conversion therapy, the Review favorably cites literature proposing methods that claim to suppress transgender identity in children and uses the ‘desistance’ data from this literature unquestioningly.” [Yale Law School, An Evidence-Based Critique of the Cass Review, [7/1/24](#)]

As Identified By The Respondents, The Cass Review Explicitly Denounced Conversion Practices

Respondents In *Chiles v. Salazar* Noted That Nothing In The Cass Review Challenged The Evidence On Conversion Practices’ Harmful Effects And Directly Quoted The Review, Stating That “No LGBTQ+ Group Should Be Subjected To Conversion Practice.” “Nothing in the Cass Review—cited for the first time in the Petition, see Pet. 3-4, 8-9, 282—challenges the evidence on conversion therapy’s harmful effects. Indeed, that Review states that ‘no LGBTQ+ group should be subjected to conversion practice,’ Cass Review at 150 § 11.5, and observes that ‘[n]o formal science-based training in psychotherapy, psychology or psychiatry teaches or advocates conversion therapy.’ Id. at 151 § 11.7.” [Supreme Court, *Chiles v. Salazar*, Brief in Opposition, [1/6/25](#)]

The Respondents Argued The Cass Review Advocated For The Approach Taken By Colorado’s Ban When The Review Stated That Carrying Out Conversion Practices Would Be “Acting Outside Of Professional Guidance.” “It advocates the approach taken by the MCTL: ‘If an individual were to carry out such practices they would be acting outside of professional guidance, and this would be a matter for the relevant regulator.’ Cass Review at 151 § 11.7.” [Supreme Court, *Chiles v. Salazar*, Brief in Opposition, [1/6/25](#)]

Dr. Cass Herself Stated That “Everyone Should Be Protected From Conversion Therapy.” “Everyone should be protected from conversion therapy,” Dr Cass said. ‘It’s a completely unacceptable practice.’ [BBC, [5/7/24](#)]

The Petition Cited Research On Sexual Fluidity From Researcher Lisa Diamond, Despite Her Explicitly Writing That Sexual Orientation Is Not Changeable Or A Choice

The Brief Appeared To Defend Conversion Practices By Stating That Human Sexuality Was Subject To Change

The Petitioner Argued That “Desires Related To Human Sexuality Are Also Subject To Change” And Cited Dr. Lisa Diamond’s Research. “Actions and desires related to human sexuality are also subject to change. Respected researchers who support LGBT advocacy have concluded that ‘arguments based on the immutability of sexual orientation are unscientific, given that scientific research does not indicate that sexual orientation is uniformly biologically determined at birth or that patterns of same-sex and other-sex attractions remain fixed over the life course.’ Lisa M. Diamond & Clifford J. Rosky, Scrutinizing Immutability: Research on Sexual Orientation & U.S. Legal Advocacy for Sexual Minorities, 53 J. of Sex Research 1–2 (2016).” [Supreme Court, Chiles v. Salazar, Petition for a Writ of Certiorari, filed [11/8/24](#)]

Lisa Diamond Is A Renowned Professor Of Women’s Sexuality At The University Of Utah, And The Author Of “Sexual Fluidity: Understanding Women’s Love and Desire.” “Lisa Diamond, PhD is a renowned professor, researcher, and published author working jointly in the Department of Psychology and the Division of Gender Studies at the University of Utah. Her main research interests are women’s sexuality, sexual fluidity over the lifespan, and relationship science. Diamond wrote Sexual Fluidity: Understanding Women’s Love and Desire (2009), published by Harvard University Press. In this oral history interview, Diamond shares the experiences and motivations she had as she became a prominent lesbian woman research psychologist. Diamond also emphasizes the importance of both the mentorship she received growing up, and the mentorship she imparts to her students.” [University of Utah, accessed [9/19/25](#)]

The Author Cited Explicitly Wrote That Sexual Orientation Could Not Be Chosen Or Changed To Avoid Potential Political Manipulation Of Her Research

Dr. Lisa Diamond Acknowledged The Potential For Political Manipulation Of Her Findings And Was Clear That Sexual Orientation Cannot Be Changed. “Aware of the controversy and political manipulation that her findings could incite, Diamond opted to begin the book by addressing some of the most common misconceptions regarding what she terms ‘sexual fluidity.’ An excerpt: [...] Does sexual fluidity mean that sexual orientation can be changed? No. It simply means that a woman’s sexual orientation is not the only factor determining her attractions. A predominantly heterosexual woman might, at some point in time, become attracted to a woman, just as a predominantly lesbian woman might at some point become attracted to a man. Despite these experiences, the women’s overall orientation remains the same.” [Harvard University Press Blog, [2/2/12](#)]

Dr. Diamond Also Wrote That Fluidity Did Not Mean That Sexual Orientation Was A Matter Of Choice. “Does fluidity mean that sexual orientation is a matter of choice? No. Even when women undergo significant shifts in their patterns of erotic response, they typically report that such changes are unexpected and beyond their control. In some cases they actively resist these changes, to no avail. This finding is consistent with the extensive evidence showing that efforts to change sexual orientation through ‘reparative therapy’ simply do not work.” [Harvard University Press Blog, [2/2/12](#)]

The Petitioner Cited Dr. Riittakerttu Kaltiala, A Finnish Professor Who Opposes Gender Affirming Care, To Argue Children Grow Out Of Gender Confusion; Her Clinic Has Faced Controversy For Treatment Of Transgender Patients

The Cert Petition Cited A Daily Wire Article Where Dr. Riittakerttu Kaltiala Said 4 Out Of 5 Children Grow Out Of Gender Confusion

The Cert Petition Cited A Daily Wire Article Claiming Finland's Leading Gender Dysphoria Expert Said 4 Out Of 5 Children Grow Out Of Gender Confusion. "A growing body of research reveals how critical Chiles's counseling is, especially for young people. Most minors who experience gender dysphoria become comfortable with their biological sex if they are not affirmed in a transgender identity. Wylie C. Hembree et al., Endocrine Treatment of Gender-Dysphoric/Gender-Incongruent Persons: An Endocrine Society Clinical Practice Guideline, 102 J. of Clinical Endocrinology & Metabolism 3869, 3879 (2017); Christina Buttons, Finland's Leading Gender Dysphoria Expert Says 4 Out of 5 Children Grow Out of Gender Confusion, Daily Wire (Feb. 6, 2023)." [Supreme Court, Chiles v. Salazar, Petition for a Writ of Certiorari, filed [11/8/24](#)]

The Article Cited Dr. Riittakerttu Kaltiala. "Finland's leading expert on pediatric gender medicine says 'four out of five' children will grow out of their gender confusion. Dr. Riittakerttu Kaltiala, the chief psychiatrist at Tampere University, Finland's largest pediatric gender clinic, recently had an interview with the country's top newspaper about her reluctance to recommend surgical and chemical sex change services for minors who identify as transgender." [Daily Wire, [2/6/23](#)]

Dr. Kaltiala's Clinic Patients Have Reported Concerning Treatment, Including Being Addressed By Their Old Names After Legal Name Changes And Controversial "Gender Exploratory Therapy"

Patients Of Dr. Kaltiala's Clinic Have Reported Mistreatment From Clinicians, Including Being Asked How They Masturbate In An Allusion To The Discredited Fetish Theory, Being Told Bottom Surgery Was Ineffective, And Having Treatment Put On Hold For Having "Too Girlish" Hobbies. "Simultaneously, alarming testimonials from Dr. Kaltiala's patients regarding their clinic encounters started circulating. The Finnish LGBTQ+ platform, Kehräjä, solicited information from many of the clinics patients. What it found was shocking. The publication detailed an alleged incident where a clinician asked a young girl to 'describe to me how you masturbate,' an allusion to the discredited theory of transgender identity being a fetish, once used as a way to invalidate many transgender people. Additionally, a transgender boy was allegedly cautioned that bottom surgery 'seldom functions correctly,' and was remarked upon his stature, being told he would 'be quite short for a man.' His treatment was subsequently put on hold after being told that his hobbies were 'too girlish.'" [Erin in the Morning, [10/21/23](#)]

Numerous Patients Reported Being Addressed By Their Old Names Even After Legal Name Changes, Which The Clinic Denied. "Numerous patients have reported being addressed by their old names in the clinic, a practice that apparently persisted irrespective of legal name changes. While the clinic denies these claims, Dr. Kaltiala's statements reflect a similar stance." [Erin in the Morning, [10/21/23](#)]

Dr. Kaltiala Has Made Anti-Transgender Statements, Like Saying "Acceptance" Of Gender Dysphoria Means Denying The Validity Of Transgender Identities. "While the clinic denies these claims, Dr. Kaltiala's statements reflect a similar stance. She is on record opposing the validity of transgender people's gender identities, once stating, 'Acceptance means saying, 'So you're a boy who feels like you're a girl,' to a transgender girl.'" [Erin in the Morning, [10/21/23](#)]

The Clinic Endorsed "Gender Exploratory Therapy," A New Form Of Conversion Practices Endorsed By Southern Poverty Law Center-Designated Hate Group American College Of Pediatricians. "Perhaps the

most disconcerting aspect is the clinic's endorsement of what appears to be 'gender exploratory therapy,' a new form of conversion therapy. This method, increasingly favored by right-wing opponents of trans healthcare, aims to postpone transition indefinitely while attributing a trans identity to factors other than a person's authentic experience of gender. As a result, necessary care is perpetually deferred until trans youth feel that transitioning is no longer viable or they age into adulthood. This form of conversion therapy, endorsed by many in the Christian right in the United States, has also been advocated by the American College of Pediatricians — an organization with a deceptive name that has been identified as a hate group by the Southern Poverty Law Center (SPLC).” [Erin in the Morning, [10/21/23](#)]

- **“Gender Exploratory Therapy” Is An Alternate Phrase For “Conversion Therapy” Which Falsely Claims To Change An LGBTQ+ Person’s Gender Identity Or Expression.** “‘Gender Exploratory Therapy’ or ‘Gender Exploration Therapy’ are some of the many alternate phrases utilized to promote the harmful and discredited practice of so-called ‘conversion therapy,’ which falsely claims to change an LGBTQ person’s sexual orientation, gender identity, or gender expression. ‘Conversion therapy’ has been condemned by all major medical, psychiatric, and psychological organizations, including the American Medical Association and American Psychological Association. And there is a growing movement to ban ‘conversion therapy’ around the world.” [GLAAD, accessed [9/19/25](#)]

The Petitioner Cited Dr. Cummings As Evidence Of The Success Of Conversion Practices, Despite The Doctor Clarifying His Work And Calling Interventions To “Cure Homosexuality” A Violation Of Human Rights

The Brief Cited The Work Of Dr. Nicholas Cummings, Who Claimed To Successfully Counsel Clients To Change Their Unwanted Sexual Orientations And Gender Identities

The Petition Cited Dr. Nicholas Cummings Who Claimed To Have Counseled Hundreds Of Clients To Successfully Change Their Sexual Orientations And Gender Identities. “The former president of the American Psychological Association, Dr. Nicholas Cummings, agrees that sexual orientation and gender identity are not immutable. After counseling hundreds of clients who successfully changed their unwanted sexual orientations and gender identities, Dr. Cummings concluded that it is ‘a distortion of reality’ to suggest that change is impossible. App.203a.” [Supreme Court, *Chiles v. Salazar*, Petition for a Writ of Certiorari, filed [11/8/24](#)]

Dr. Nicholas Cummings Was A Psychologist Who Claimed In 2010 That His Staff Had Engaged In “Sexual Reorientation Change” In Hundreds Of Cases Between 1958 And 1980. “Dr. Nicholas Cummings (1924-2020) spoke and wrote in support of sexual orientation change in therapeutic settings when requested by the client. He referred to this as ‘reorientation therapy’ or ‘sexual orientation change.’ In 2010, he stated that he and his staff had engaged in ‘sexual reorientation change’ in hundreds of cases between 1958 and 1980. At this time, the American Psychological Association had not taken a stance on the ethicality of such practices.” [University of Akron, Cummings Center, [2/2/25](#)]

Dr. Cummings And His Foundation Have Sought To Clarify His Views Before And After His Death, Noting That His Statements Were Used To Promote Harmful “Therapy”

In 2015, Dr. Cummings Stated That His Views On Sexual Orientation Change Efforts Had Been Distorted And The Use Of “Therapy” To “Cure Homosexuality” Was Unethical And A Basic Violation Of Human Rights. “In 2015, at the age of 91, Dr. Cummings stated that his views on sexual orientation change efforts had been distorted and that he believed that the use of such ‘therapy’ to ‘cure homosexuality’ was unethical and a basic violation of human rights. He stated that he believed patients should have the right to choose their own treatment goals.” [University of Akron, Cummings Center, [2/2/25](#)]

May 2023: The Cummings Foundation Posted An Open Letter Apologizing For How Dr. Cummings Statements Were Used To “Promote The Now Discredited And Dangerous Practices” Including Conversion Practices. “The Cummings family offers an open apology for statements made by Dr. Cummings that may have been used to promote the now discredited and dangerous practices used with the LGBTQIA+ community before the publishing of the Diagnostic and Statistical Manual (DSM), third edition. This includes ‘sexual reorientation therapy’ and ‘reparative therapy’ — all of which we refer to as ‘conversion therapy.’ We extend our most heartfelt apology to individuals of the LGBTQIA+ community, including their families, loved ones, practitioners, and professional organizations in the psychology field.” [Cummings Foundation, Open Letter, [5/10/23](#)]

The Brief Cited Personal Anecdotes From Reddit And A Conversion Practices Group, But Offered No Expert Declarations Or Affidavits To Support Her Claims

Unlike Other Anti-LGBTQ+ Lawsuits Which Have Used Anti-Trans Doctors As Expert Witnesses, The Petitioner Did Not Offer Expert Declarations Or Affidavits

The Respondents Noted That The Petitioner Offered No Expert Declarations Or Affidavits And Offered “Unvetted And Irrelevant Non-Record Material” To Support Her Claims. “Petitioner offered no expert declarations or affidavits and now invokes unvetted and irrelevant non-record material to suggest that young people’s health is at risk if health care professionals are unable to engage in conversion therapy—when the evidence indicates nothing of the sort. Her failure to develop a record also makes this an especially poor vehicle for considering her pre-enforcement, facial challenge.” [Supreme Court, Chiles v. Salazar, Brief in Opposition, [1/6/25](#)]

The Notable *US v. Skremetti* Supreme Court Case Involved Testimony From Discredited Anti-Trans Doctors. “The doctors have been dismissed by judges across the US as ‘conspiratorial’, ‘deeply biased’, ‘far off’ and deserving ‘very little weight’. But their testimonies were nonetheless submitted by the state of Tennessee in defense of an anti-trans law the US supreme court will consider in December, in one of the most important cases of the court’s session and among the most consequential LGBTQ+ rights cases in its history. In *US v Skremetti*, the court will weigh whether transgender youth have a constitutional right to access healthcare treatments endorsed by every major medical association in the country, who say the care improves patients’ mental health and reduces the suicide risks of vulnerable teens.” [Guardian, [11/21/24](#)]

- **Anti-Trans Expert Witnesses Has Been A Growing, Profitable Industry.** “HuffPost scoured thousands of pages of court filings and dozens of state vendor databases and filed more than 40 public records requests to get a full picture of their growing cottage industry. The search revealed that these expert witnesses routinely pull down five figures in return for just a few weeks of work. Since 2016, state and local governments have spent more than \$1.1 million on expert testimony, much of it going to just six go-to witnesses.” [Huffpost, [5/13/24](#)]

The Petition For A Writ Of Certiorari Cited Just 13 “Other Authorities,” Including Four Personal Anecdotes. [Supreme Court, Chiles v. Salazar, Petition for a Writ of Certiorari, ix, filed [11/8/24](#)]

The Petitioner Cited Personal Anecdotes, Including From A Conversion Practices Group That Promotes The Idea That Homosexuality Stems From Sexual Trauma

The Petitioner’s Brief Cited A Reddit Thread In A Detransitioner Forum. “As a result, many struggling with gender dysphoria do not ‘trust ... anyone involved in gender or transgender health’ because they perceive the field as ‘bullying ... in the guise of being healers.’ r/detrans, finding a normal therapist in 2024, Reddit (Sept. 1, 2024), <http://bit.ly/4fWs81B>.” [Supreme Court, Chiles v. Salazar, Petition for a Writ of Certiorari, filed [11/8/24](#)]

The Petitioner’s Brief Cited A Personal Anecdote Of A Teen Who Struggled With Gender Dysphoria But Was Glad She Did Not Medically Transition. “Consider Brie Jentry’s teenage daughter, Maxine, who struggled with gender dysphoria in her early teens. Rather than subject her daughter to ‘significant bodily harm,’ Brie ‘supported her in her discomfort.’ Heyer, *supra* at 88. Through therapy, Maxine ‘came to some self-understanding’ and realized ‘[d]iscomfort about your body and sometimes dysphoria are a normal part of being a teenager and having your body change.’ *Id.* at 88–89. Now her ‘life is full and rich, and [she’s] very glad [she] did not medically transition.’ Yet Colorado and states like it give struggling teens like Maxine little other choice.” [Supreme Court, *Chiles v. Salazar*, Petition for a Writ of Certiorari, filed [11/8/24](#)]

- **At The Cited Permalink, Maxine Requested For Her Interview To Be Removed Because She Did Not Want To Share Her Personal Story With The Internet, Yet The Petitioner Still Cited Her Comments.** “At her request, we have removed our interview with Maxine. She told us: ‘I’m still happily desisted from my former trans identification. In fact, I have moved on to the point that I am no longer interested in talking or even thinking about ‘gender.’ My life is full and rich, and I’m very glad I did not medically transition. But I am a private person, and at this time, am no longer willing to share my very personal story with the world via the Internet.” [4thWaveNow, captured [11/8/24](#)]

The “Changed Movement” Is A Leading Group Promoting Conversion Practices In Response To State Bans. “The closing of Exodus International signaled the end of a decades-long push for ex-gay therapy, or so it would seem. But in recent years, as legislation has passed across the country to ban conversion therapy for youth, a new push for so-called ‘change therapy’ has re-emerged with the same flawed premise and tactics of the ex-gays of old. A group called Changed Movement, formed in response to legislation banning conversion therapy in California, is one such group using new language to promote the same-old conversion therapy.” [Teen Vogue, [4/19/24](#)]

Changed Movement Shares Stories Of Individuals Blaming Trauma, Violence, And Other Experiences As The Root Of “Deviant” Sexual Orientation Or Gender Identity. “Conversion or reparative therapy, loosely defined, is any attempt to influence and change someone’s sexual orientation or gender identity. Often, these counselors blame trauma or violence, family dynamics, or your upbringing as the root of the deviant sexuality or gender identity. Changed Movement shares stories of individuals blaming these roots as the cause of their sexuality or gender.” [Teen Vogue, [4/19/24](#)]

- **The Brief Shared A Story From The Changed Movement Of A Woman Who Turned To A Sexual Relationship With A Woman Friend To “Feel Safe Again” After A Sexual Assault By A Man, But Sought Christian “Talk Therapy” In A “Journey Of Healing.”** “Or take Bree Stevens. She ‘was attacked and sexually assaulted by a young man’ at age 15. Changed Movement, <https://perma.cc/9KNL-WBCT>. ‘That experience left’ her ‘with bruises, confusion, suicidal thoughts, self-harming behavior, self-hatred, and deep inner turmoil, including the belief that men were not safe.’ *Ibid.* She turned initially to a sexual relationship with a female friend to ‘feel safe again.’ *Ibid.* Yet as she ‘began to understand [her] deeper needs,’ she realized that a same-sex relationship wasn’t what she wanted. *Ibid.* She ‘sought healing through Christian counselors’—which included ‘talk therapy’—and that ‘enabled [her] to resolve the hurts of [her] past while confronting what [she] had wrongly believed about womanhood and men.’ *Ibid.* In many places, this ‘journey of healing’ that has allowed Bree to live ‘a life of joy, health, and wholeness’ is illegal.” [Supreme Court, *Chiles v. Salazar*, Petition for a Writ of Certiorari, filed [11/8/24](#)]
- **The Brief Cited Another Example Of A Changed Movement Story Claiming Success From Conversion Therapy.** “Or consider Ken Williams. He started “experiencing same-sex attraction[s]” in middle school, but ‘didn’t want to have those desires.’ Changed Movement, <https://perma.cc/BKC8-UAES>. By age 17, this inner turmoil made him feel ‘so hopeless that [he] started planning [his] suicide.’ *Ibid.* Fortunately, he asked to see a ‘Christian counselor’ instead, and those ‘five years of counseling saved [his] life.’ *Ibid.* Yet Ken could not have gotten this life-saving help in more than half the country.” [Supreme Court, *Chiles v. Salazar*, Petition for a Writ of Certiorari, filed [11/8/24](#)]

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