

Nos. 14-556, 14-562, 14-571, 14-574

**IN THE SUPREME COURT OF THE  
UNITED STATES**

---

**JAMES OBERGEFELL, et al.,  
Petitioners**

v.

**RICHARD HODGES, et al.,  
Respondents.**

**[Additional Captions on Back Cover]**

---

**On Writs of Certiorari to the  
U.S. Court Of Appeals for the Sixth Circuit**

---

**BRIEF OF AMICI CURIAE DR. JUDITH  
REISMAN AND LIBERTY CENTER FOR  
CHILD PROTECTION IN SUPPORT OF  
RESPONDENTS**

---

Mathew D. Staver  
(Counsel of Record)  
Anita L. Staver  
Horatio G. Mihet  
LIBERTY COUNSEL  
PO Box 540774  
Orlando, FL 327854  
(800) 671-1776  
court@lc.org

Mary E. McAlister  
LIBERTY COUNSEL  
PO Box 11108  
Lynchburg, VA 24506  
(800) 671-1776  
court@lc.org

**VALERIA TANCO, et al.,  
Petitioners,**

**v.**

**WILLIAM EDWARD “BILL” HASLAM,  
et al., Respondents.**

**APRIL DEBOER, et al.,  
Petitioners,**

**v.**

**RICHARD SNYDER, et al.,  
Respondents.**

**GREGORY BOURKE, et al.,  
Petitioners,**

**v.**

**STEVE BESHEAR, et al., Respondents.**

## TABLE OF CONTENTS

TABLE OF AUTHORITIES.....	iii
INTEREST OF AMICI.....	1
INTRODUCTION .....	2
LEGAL ARGUMENT .....	6
I. MARRIAGE WAS NOT CREATED BY AND CANNOT BE REDEFINED BY LAW.....	6
II. COURTS HAVE USED <i>LAWRENCE</i> TO JUSTIFY CREATING AN ARTIFICIAL CONSTRUCT OF SAME-SEX “MARRIAGE.” .....	12
III. ALFRED KINSEY’S REPORTS WERE IDEOLOGICALLY DRIVEN PROPAGANDA NOT SUPPORTED BY SCIENCE. ....	17
A. Kinsey Used Child Molesters To Convince The World That All Sexual Activity Is Normal And Acceptable....	20
B. Kinsey’s Reports Are Neither Scientific Nor Objective. ....	34

**IV. CULTURAL CHANGE AGENTS  
IGNORED ERRORS AND EVIDENCE OF  
CHILD MOLESTATION AND CALLED  
FOR FUNDAMENTAL  
TRANSFORMATION BASED UPON  
KINSEY’S “WORK.”..... 38**

**A. Behavioral Science Uses Kinsey  
To Steer Away From Morality..... 39**

**B. Legal Experts Push For Overhaul  
Of Criminal Law Based On Kinsey. ... 42**

**V. DISMANTLING MARRIAGE WILL  
EXACERBATE THE CULTURAL  
DAMAGE CAUSED BY KINSEYAN  
PHILOSOPHY. .... 50**

**CONCLUSION ..... 53**

## TABLE OF AUTHORITIES

### CASES

<i>Baskin v. Bogan</i> , 766 F.3d 648 (7th Cir. 2014) 13, 14, 15, 19, 30	
<i>Bostic v. Schaefer</i> , 760 F.3d 352 (4th Cir. 2014) .....	13
<i>Buck v. Bell</i> , 274 U.S. 200 (1927).....	54
<i>Dred Scott v. Sandford</i> , 60 U.S. 393 (1856).....	54
<i>Ex parte State of Alabama ex rel. Alabama Policy Institute</i> , 2015 WL 892752 (Supreme Court of Alabama March 3, 2015)....	2, 6, 7, 16
<i>Gay Rights Coalition of Georgetown University Law Center v. Georgetown University</i> , 536 A.2d 1 (D.C. Ct. App. 1987) .....	8
<i>Goodridge v. Dep't. of Public Health</i> , 440 Mass. 309 (2003) .....	12
<i>Hernandez-Montiel v. INS</i> , 225 F.3d 1084 (9th Cir. 2000) .....	8
<i>Johnson v. Dep't. of Justice</i> , 60 Cal.4th 871 (2015).....	15, 32

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.