SUPREME COURT

of the

STATE OF CONNECTICUT

S.C. 17716

ELIZABETH KERRIGAN, ET AL.

v.

COMMISSIONER OF PUBLIC HEALTH, ET AL.

JOINT BRIEF OF AMICI CURIAE (i) HUMAN RIGHTS CAMPAIGN; (ii) HUMAN RIGHTS CAMPAIGN FOUNDATION; (iii) EQUAL JUSTICE SOCIETY; (iv) NATIONAL CENTER FOR LESBIAN RIGHTS; (v) NATIONAL GAY AND LESBIAN TASK FORCE; AND (vi) PARENTS, FAMILIES AND FRIENDS OF LESBIANS AND GAYS, INC. IN SUPPORT OF PLAINTIFFS-APPELLANTS

Stuart D. Rosen
William C. Heuer
Meghan Freed Pelletier
BINGHAM McCUTCHEN LLP
One State Street
Hartford, CT 06103-3178
Tel. (860) 240-2700
Fax (860) 240-2818
Juris No. 27045

Stuart F. Delery
Nora Freeman Engstrom
Benjamin C. Mizer
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Avenue NW
Washington, D.C. 20006
Of Counsel

TABLE OF CONTENTS

TABLE OF AUTHORITIES

CASES

STATUTES

OTHER AUTHORITIES

INTEREST OF AMICI CURIAE

Human Rights Campaign ("HRC"), the largest national lesbian, gay, bisexual, and transgender political organization, envisions an America where gay, lesbian, bisexual, and transgender people (hereafter, "gay people") are ensured of their basic equal rights and can be open, honest, and safe at home, at work, and in the community. Among those basic rights is equal access for same-sex couples to marriage and the related protections, rights, benefits, and responsibilities. HRC has over 600,000 members, including nearly 7,000 in Connecticut, committed to making this vision of equality a reality.

Human Rights Campaign Foundation ("The Foundation") is an affiliated organization of the Human Rights Campaign. The Foundation's cutting-edge programs develop innovative educational resources on the many issues facing lesbian, gay, bisexual, and transgender ("LGBT") individuals, with the goal of achieving full equality regardless of sexual orientation or gender identity or expression. The Foundation's Family Project is the most comprehensive and up-do-date resource for and about LGBT families. It provides legal and policy information about family law, including marriage and relationship recognition, as well as public education in those areas.

The Equal Justice Society ("EJS") is a national civil rights advocacy organization whose membership includes LGBT people. The organization is dedicated to strategically advancing social equality through law and public policy, communications and the arts, and alliance building. EJS has been in the forefront at state and national levels in the courts, on policy initiatives, and in the public discourse advocating on behalf of LGBT and other communities for equal access and opportunities in our society.

The National Center for Lesbian Rights ("NCLR") is a national non-profit legal organization dedicated to protecting and advancing the civil rights of LGBT people and their families through a program of litigation, public policy advocacy, and public education. Since its founding in 1977, NCLR has played a leading role in protecting and securing fair and equal treatment of LGBT parents and their children. NCLR has litigated family law cases on behalf of gay persons and their families in more than twenty-five states in the areas of child custody and visitation, adoption, foster care, parentage, and marriage.

The National Gay and Lesbian Task Force, founded in 1973, is the first national LGBT civil rights and advocacy organization. With members in every U.S. state, the Task Force works to build the grassroots political strength of the LGBT community by training state and local activists and leaders; conducting research and data analysis; and organizing broad-based campaigns to advance pro-LGBT legislation and to defeat anti-LGBT referenda. As part of a broader social justice movement, the Task Force works to create a world in which all people may fully participate in society, including the full and equal participation of same-sex couples in the institution of civil marriage.

Parents, Families and Friends of Lesbians & Gays, Inc. ("PFLAG") is a national, nonprofit family organization founded in New York in 1973 by heterosexual mothers and fathers, now with a grassroots network of over 200,000 members and supporters (including 4,550 in Connecticut). Although PFLAG's members and supporters are primarily heterosexual, PFLAG promotes the health and well-being of gay, lesbian, bisexual and transgender persons, their families, and their friends through support, education, and advocacy to promote true, full civil rights for all Americans.

ARGUMENT

Connecticut courts generally give heightened scrutiny to legislative classifications that disadvantage a group that has been (1) "subjected to a history of purposeful unequal treatment," (2) "saddled with . . . disabilities" based on stereotypical characteristics not truly indicative of its abilities, or (3) "relegated to a position of . . . [relative] political powerlessness." *Leech v. Veterans' Bonus Div. App. Bd.*, 179 Conn. 311, 314, 426 A.2d 289, 291 (1979) (citing *San Antonio Indep. Sch. Dist. v. Rodriguez*, 411 U.S. 1, 28 (1973)). Classifications based on sexual orientation satisfy all three criteria; thus, denial of marriage licenses to same-sex couples must be reviewed under heightened scrutiny under the Connecticut Constitution. This is especially clear in light of related Connecticut precedents and public policy relating to sexual orientation, which expressly recognize that gay people have been subjected to pervasive discrimination and excluded from political power and that sexual orientation has no bearing on a person's ability to contribute and participate in society. *See City Recycling, Inc. v. State*, 257 Conn. 429, 444, n.12, 778 A.2d 77, 87 (2001) (holding that in determining whether state equal protection clause affords greater protection than the federal equal protection provision, Connecticut courts should consider, among other factors, "related Connecticut precedents" and "relevant public policies") (citing *State v. Geisler*, 222 Conn. 672, 684-686, 610 A.2d 1225, 1231-1232 (1992)).[1/] As is demonstrated herein, heightened scrutiny should be applied in this case.

[1/] The level of scrutiny applicable to sexual-orientation classifications is an open question under federal law because the Supreme Court recently invalidated laws that discriminated based on sexual orientation as not even being supported by a legitimate state interest. *See Lawrence v. Texas*, 539 U.S. 558 (2003); *Romer v. Evans*, 517 U.S. 620 (1996). Some courts of appeals have held that laws disadvantaging gay men and lesbians are not entitled to heightened scrutiny. Those opinions, however, rest largely on *Bowers v. Hardwick*, 478

I. GAY PEOPLE HAVE SUFFERED A PERSISTENT HISTORY OF INVIDIOUS DISCRIMINATION IN THE UNITED STATES

Over the past one hundred years—and particularly in the latter half of the twentieth century—gay people have been subjected to discrimination in all areas of their lives. *See Gay & Lesbian Law Students Ass'n v. Board of Trs.*, 236 Conn. 453, 673 A.2d 484 (1996) (stating that Connecticut's Gay Rights Law "was enacted to protect people from pervasive and invidious discrimination on the basis of sexual orientation"). *See generally* George Chauncey, *Why Marriage: The History Shaping Today's Debate Over Gay Equality* 14-20 (2004) ("Chauncey, *Why Marriage*"). Gay Americans have faced prosecution for socializing with their peers and engaging in intimate acts with loved ones. They have been fired from their jobs, denied employment, and disallowed from defending their country. They have been officially labeled as mentally disordered and deviant. As a result of these labels, they have been subjected to indefinite confinement, incarceration, and involuntary "treatments" in search of a "cure," as well as officially excluded from immigrating to the United States. Gay people have—and continue to be—subjected to extreme violence and harassment. Finally, they have been denied the ability to marry the person of their choice and have been barred from adopting and raising children.

Private Lives and Personal Relationships. Until very recently, broadly drafted laws in many states imposed limits (backed up by criminal penalties) on the intimate associations of gay people. As late as 1961, all fifty states, including Connecticut, outlawed

---

U.S. 186 (1986), which has been overruled because it "was not correct when it was decided, and it is not correct today," *Lawrence*, 539 U.S. at 578. In *Lawrence*, Justice O'Connor explained that "a more searching form" of equal protection review applies to laws that exhibit "a desire to harm a politically unpopular group" and that "inhibit[] personal relationships." *Id.* at 580 (O'Connor, J., concurring).

sodomy—thus rendering it illegal for gay people to engage in certain intimate acts with loved ones. Thirteen states criminalized forms of same-sex intimate conduct until 2003, when such laws were finally declared unconstitutional in *Lawrence v. Texas*, 539 U.S. 558 (2003). By making private, consensual sexual conduct a crime, states touched "upon the most private human conduct, sexual behavior, and in the most private of places, the home," *id.* at 567, and effectively treated all gay people as criminals, thus breeding and legitimizing ever more pernicious discrimination, *id.* at 575. During the middle of the last century, using the sodomy laws as a springboard, police departments in many cities engaged in stakeouts of gay establishments; decoy operations, whereby gay men could be charged with sexual solicitation of undercover officers; and police raids targeting groups of socializing gay men and lesbians. *See* John D'Emilio, *Sexual Politics, Sexual Communities: The Making of a Homosexual Minority in the United States 1940-1970*, at 49-51 (1983) ("D'Emilio, *Homosexual Minority*"); *see also* Sylvia A. Law, *Homosexuality and the Social Meaning of Gender*, 1988 Wis. L. Rev. 187, 189-190 (1988) (citing *State v. Trombley*, 3 Conn. Cir. Ct. 28, 29-30, 206 A.2d 482, 483 (1964) (defendant arrested by plainclothes detective in a neighborhood frequented by gay men)).

Employment. Gay people have long been denied employment in various fields. In 1950, a United States Senate subcommittee concluded that homosexuals were "generally unsuitable" for public employment, resulting in a purge of gay employees from the federal civil service. In 1953, President Eisenhower issued Executive Order 10,450, which required the dismissal of *all* government employees who were homosexuals from both the civilian and military branches of the federal government. Patricia A. Cain, *Litigating for Lesbian and Gay Rights: A Legal History*, 79 Va. L. Rev. 1551, 1565-1566 (1993) ("Cain, *A*

Legal History"). This Executive Order also required all private corporations with federal contracts to ferret out and discharge their gay employees. As a result, thousands of men and women were fired or forced to resign from their jobs because they were gay or suspected of being gay. *Developments in the Law—Sexual Orientation and the Law*, 102 Harv. L. Rev. 1508, 1556 (1989). This ban remained in effect until 1975. Currently, under the so-called "Don't Ask, Don't Tell" law, 10 U.S.C. § 654, evidence that a service member has engaged in homosexual conduct or intends to do so still renders the individual ineligible for service in the armed forces. *See* 10 U.S.C. § 654. Many other government agencies have fired employees for being gay, including the FBI, *see Padula v. Webster*, 822 F.2d 97 (D.C. Cir. 1987), local police departments, *see, e.g., City of Dallas v. England*, 846 S.W.2d 957, 958 (Tex. Ct. App. 1993), and school districts, *see, e.g., Rowland v. Mad River Local Sch. Dist.*, 470 U.S. 1009, 1009 (1985) (mem.) (Brennan, J., dissenting from denial of certiorari); *Gaylord v. Tacoma Sch. Dist. No. 10*, 559 P.2d 1340 (Wash. 1977).

Deviance Labels. Gay people have also been labeled with mental disorders, with devastating consequences. For many years, gay people were excluded from admission into the United States as "psychopathic personalities," *see Boutilier v. INS*, 387 U.S. 118, 122 (1967) (concluding that Congress used that phrase "to effectuate its purpose to exclude all homosexuals and other sex perverts"), and until 1990, United States immigration laws permitted authorities to deny a person the right to immigrate to the United States on account of his or her sexual orientation, *see* Cain, *A Legal History* 1593. More generally, sodomy provided a basis for the often indeterminate commitment of gay people as sex offenders. Christopher R. Leslie, *Creating Criminals: The Injuries Inflicted by "Unenforced" Sodomy Laws*, 35 Harv. C.R.-C.L. L. Rev. 103, 114, 124 (2000). Once

institutionalized, gay people were sometimes subjected to "therapies" ranging from the comparatively less invasive—such as psychotherapy and hypnosis—to the more severe, such as aversion therapy, castration, hysterectomies, lobotomies, electroshock treatment, and the administration of untested drugs. *See* D'Emilio, *Homosexual Minority* 14, 17-18. The American Psychiatric Association and other major medical associations stopped classifying homosexuality as a mental illness in the 1970s. Chauncey, *Why Marriage* 37.

Violence and Harassment. The United States Surgeon General estimates that 45% of gay people have been threatened with violence as a result of their sexual orientation, and 17% have been physically attacked. U.S. Surgeon General, *The Surgeon General's Call to Action to Promote Sexual Health and Responsible Sexual Behavior* 4 (July 9, 2001) ("*Surgeon General's Call to Action*"), *available at* http://www.surgeongeneral.gov/library/sexualhealth/call.htm; *see also* The Henry J. Kaiser Family Foundation, *Inside-OUT: A Report on the Experiences of Lesbians, Gays, and Bisexuals in America and the Public's Views on Issues and Policies Related to Sexual Orientation* 2 (2001) ("Kaiser, *Inside-OUT*") (about one third of lesbians, gay men, and bisexuals surveyed had been the target of physical violence).[2/] In 2001, a national survey found that 74% of lesbians, gay men, and bisexuals reported having experienced prejudice and discrimination based on their sexual orientation. Kaiser, *Inside-OUT* 3. Likewise, the Surgeon General estimates that 80% of gay people have been verbally or physically harassed. *Surgeon General's Call to Action* 4. In a recent survey, more than one quarter of gay, lesbian, and bisexual students "reported missing at least one entire day of school in

---

[2/] *Available at* http://www.kff.org/kaiserpolls/upload/New-Surveys-on-Experiences-of-Lesbians-Gays-and-Bisexuals-and-the-Public-s-Views-Related-to-Sexual-Orientation-Report.pdf.

the previous month because they felt unsafe due to their sexual orientation." Nat'l Ass'n of Sch. Psychologists, *Position Statement on Sexual Minority Youth* 1 (2004), *available at* http://www.nasponline.org/information/pospaper_glb.html. Connecticut has recognized the seriousness of harassment and violence against gay people by including sexual orientation in its hate crimes statutes, *see* Conn. Gen. Stat. §§ 53a-181j, 53a-181k, and 53a-181l, and by prohibiting discrimination based on sexual orientation in education, *see id.* § 10-15c.

Family Life. Gay people are barred in every state except Massachusetts from marrying the person of their choice. "Without the right to marry—or more properly, the right to choose to marry—one is excluded from the full range of human experience and denied full protection of the laws for one's 'avowed commitment to an intimate and lasting human relationship.'" *Goodridge v. Department of Pub. Health*, 798 N.E.2d 941, 957 (Mass. 2003) (citation omitted). Legislatures and courts have also denied gay people the ability to adopt children and, in some instances, even to visit or raise their own offspring. *See* Julie Shapiro, *Custody and Conduct: How the Law Fails Lesbian and Gay Parents and Their Parents*, 71 Ind. L.J. 623 (1996) (describing cases in which courts have limited or denied custody or visitation based on a parent's sexual orientation). Until 2000, there was no ability under Connecticut law for each of two parents of the same sex raising a child together to have a legal relationship with the child. *See* Conn. Gen. Stat. § 45a-727a (amending adoption statutes to permit second-parent adoptions); *see also In re Adoption of Baby Z*, 247 Conn. 474, 524, 724 A.2d 1035, 1060 (1999) (recognizing that "all of the child care experts involved have concluded that the proposed adoption would be in Baby Z.'s best interest," but that Connecticut's adoption laws limited the probate court's jurisdiction).

In light of the foregoing, it is plain that gay people have been subject to a history of "pervasive and invidious discrimination." *Gay & Lesbian Law Students Ass'n*, 236 Conn. at 481, 673 A.2d at 498. *See also, e.g., Harper v. Poway Unified Sch. Dist.*, 445 F.3d 1166, 1181 n.23 (9th Cir. 2006) (describing the history of discrimination against gay people as a "self-evident fact");*Tanner v. Oregon Health Scis. Univ.*, 971 P.2d 435, 447 (Or. Ct. App. 1986) ("[C]ertainly it is beyond dispute that homosexuals in our society have been and continue to be the subject of adverse social and political stereotyping and prejudice."); *People v. Garcia*, 92 Cal. Rptr. 2d 339, 344 (Ct. App. 2000) (recognizing that gay people "share a history of persecution comparable to that of Blacks and women"); *Gay Rights Coalition of Georgetown Univ. Law Ctr. v. Georgetown Univ.*, 536 A.2d 1, 37 (D.C. 1987) (en banc) ("This country has a long and unfortunate history of discrimination based on sexual orientation." (quotation marks omitted)).

II. SEXUAL ORIENTATION IS UNRELATED TO ONE'S ABILITY TO PERFORM IN OR CONTRIBUTE TO SOCIETY

When a characteristic is irrelevant to an individual's ability to perform or participate in society, a law that classifies on the basis of that characteristic is unlikely to be related to the achievement of any acceptable state interest and is instead more likely to reflect "outmoded notions of the relative capabilities" of groups, *City of Cleburne v. Cleburne Living Ctr.*, 473 U.S. 432, 441 (1985), or "prejudice and antipathy—a view that those in the burdened class are not as worthy or deserving as others," *id.* at 440. Careful judicial scrutiny is therefore appropriate. *Plyler v. Doe*, 457 U.S. 202, 216 n.14 (1982).

Like race, gender, illegitimacy, or national origin—and unlike intelligence, physical disability, or age, *see Cleburne*, 473 U.S. at 441—"[s]exual orientation plainly has no relevance to a person's ability to perform or contribute to society," *Watkins v. United States*

Army, 875 F.2d 699, 725 (9th Cir. 1989) (Norris, J., concurring). Homosexuality is not correlated with any "impairment in judgment, stability, reliability or general social or vocational capabilities."[3] Am. Psychiatric Ass'n, *Homosexuality Position Statement* (1992), *available at* http://www.psych.org/edu/other_res/lib_archives/ archives/199216.pdf. Indeed, the Connecticut Legislature has made it plain that sexual orientation is irrelevant not only to a person's ability to participate in society and in family life, but to government decision-making in general. In 1969, Connecticut became one of the first states in the country to decriminalize sodomy, thereby recognizing that gay persons should have the same right to enter into private intimate relationships as heterosexual persons. In addition, "it is the public policy of this state that individuals are not to be discriminated against because of their sexual orientation," and this public policy applies in "a wide spectrum of activities, including: membership in licensed professional associations ([Conn. Gen. Stat.] § 46a-81b), employment (§ 46a-81c), public accommodations (§ 46a-81d), housing (§ 46a-81e), credit practices (§ 46a-81f), employment in state agencies (§§ 46a-81h and 46a-81j), the granting of state licenses (§ 46a-81k), education and vocational programs of state agencies (§ 46a-81m), and allocation of state benefits (§ 46a-81n)." *Gay & Lesbian Law Students Ass'n*,

---

[3] If "immutability" is a consideration—and neither this Court nor the United States Supreme Court has held that it must—this factor militates in favor of recognizing sexual orientation as a suspect classification. There is broad consensus in the scientific community that, regardless of whether an individual's sexual orientation is caused by genetic makeup, hormonal factors, social environment, or a combination of the three, *none* of these factors is under an individual's control—and none supports the notion that an individual chooses sexual orientation. Simply put: "Human beings cannot choose to be either gay or straight." Am. Psychological Ass'n, *Briefing Sheet on Same-Sex Families & Relationships* 2 (2006), *available at* http://www.apa.org /ppo/issues/lgbfamilybrf604a.html; *see also Surgeon General's Call to Action* 4 ("[T]here is no valid scientific evidence that sexual orientation can be changed."); *Hernandez-Montiel v. INS*, 225 F.3d 1084, 1093 (9th Cir. 2000) ("Sexual orientation and sexual identity are immutable[.]").

236 Conn. at 483 n.24, 673 A.2d at 499 n.24. Most recently, by amending the adoption statutes to permit same-sex couples to adopt and by enacting the civil unions statute, the legislature has recognized that sexual orientation is irrelevant to a person's ability to form stable relationships and raise children. *See* Conn. Gen. Stat. § 45a-727a; P.A. 05-10 ("An Act Concerning Civil Unions"); *see also* Lawrence A. Kurdek, *Are Gay and Lesbian Cohabitating Couples Really Different from Heterosexual Married Couples?*, 66 J. Marriage & Fam. 880, 896 (2004) (explaining that same-sex relationships are as emotionally fulfilling as heterosexual relationships); Am. Psychological Ass'n, *Resolution on Sexual Orientation, Parents, and Children* (July 2004), *available at* http://www.apa.org/pi/lgbc/policy/parentschildren.pdf ("[L]esbian and gay parents are as likely as heterosexual parents to provide supportive and healthy environments for their children").

III. GAY PEOPLE LACK THE POLITICAL POWER NECESSARY TO OBTAIN REDRESS FROM THE POLITICAL SYSTEM

From the historical discussion of discrimination set forth above, it is clear that gay people have long been the objects of purposeful, government-sponsored discrimination and have been unable to counter that discrimination, or to obtain appropriate redress, through the political process. Indeed, gay people are among those "least well-equipped to protect themselves" in the political process. *Gay & Lesbian Law Students Ass'n*, 236 Conn. at 482, 673 A.2d at 498 (quoting Senator Jespersen, speaking in favor of the "Gay Rights Law"). Only recently have openly gay people dared to run for public office, and the number of openly gay elected officials is miniscule. *See*, Note: *Outing: Justifiable or Unwarranted Invasion of Privacy?*, 11 Cardozo Arts & Ent. L.J. 857, 866 n.44 (1993) (describing difficulties faced by former Connecticut Congressman Joseph S. Grabarz, Jr., when he publicly disclosed his sexual orientation). There has never been an openly gay President,

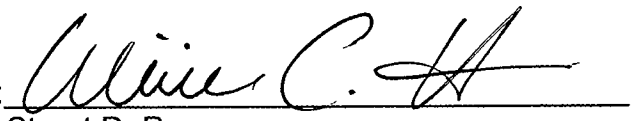
Senator, or Supreme Court Justice. Only five openly gay people have served in the U.S. House of Representatives. Indeed, in the nation as a whole, 511,000 people hold federal, state, or local elected office. Of those, a mere 305—or a meager .06%—are openly gay. Lornet Turnbull, *Gay and Lesbian Officials to Meet*, Seattle Times, Nov. 18, 2005, at B1.

Neither the existence of a few openly gay representatives, nor the passage of recent remedial legislation (including the civil union law) establishes a degree of political power that undermines the justification for close scrutiny of anti-gay legislation. In 1973 the Supreme Court deemed sex a suspect classification in *Frontiero v. Richardson*—nine years after Congress passed Title VI of the Civil Rights Act of 1964 and a decade after Congress passed the Equal Pay Act of 1963—while explicitly recognizing "that the position of women in American has improved markedly in recent decades." 411 U.S. 677, 686-688 (1973) (plurality opinion). Racial minorities were also explicitly protected from certain forms of discrimination through the Civil Rights Acts of 1866 and 1870, decades before the Supreme Court applied strict scrutiny to racial classifications. *See* Civil Rights Act of 1866, ch. 31, § 1, 14 Stat. 27; Civil Rights Act of 1870, ch. 114, § 16, 16 Stat. 144. Notwithstanding the great strides racial minorities and women have made in recent years to secure increased political power, courts continue to apply heightened scrutiny to statutes that classify on the basis of race and sex. *See, e.g., United States v. Virginia*, 518 U.S. 515, 531 (1996) (heightened scrutiny applies to sex-based classification); *Grutter v. Bollinger*, 539 U.S. 306, 326-327 (2003) (heightened scrutiny applies to race-based classification).

CONCLUSION

For the foregoing reasons, heightened scrutiny applies on the facts of this case and the judgment below should be reversed.

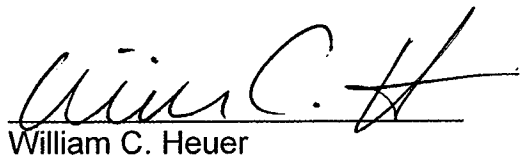
AMICUS CURIAE, (i) HUMAN RIGHTS CAMPAIGN; (ii) HUMAN RIGHTS CAMPAIGN FOUNDATION; (iii) EQUAL JUSTICE SOCIETY; (iv) NATIONAL CENTER FOR LESBIAN RIGHTS; (v) NATIONAL GAY AND LESBIAN TASK FORCE; AND (vi) PARENTS, FAMILIES AND FRIENDS OF LESBIANS AND GAYS, INC.

By: 

Stuart D. Rosen
William C. Heuer
Meghan Freed Pelletier
Bingham McCutchen LLP
One State Street
Hartford, CT 06103-3178
Tel. (860) 240-2700
Fax (860) 240-2818
Juris No. 27045

CERTIFICATE OF COMPLIANCE

I hereby certify that the Joint Brief of Amici Curiae filed on December 12, 2006, complies with Practice Book §§ 62-7 and 67-2.



William C. Heuer

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Joint Brief of Amici Curiae has been sent on this 12th day of December 2006, by first class U.S. mail, postage to the following counsel of record:

Mary L. Bonauto, Esq.
Bennett Klein, Esq.
Karen Loewy, Esq.
Jennifer Levi, Esq.
GAY & LESBIAN ADVOCATES & DEFENDERS
30 Winter Street, Suite 800
Boston MA 02108
Tel.: (617) 426-1350
Fax: (617)426-3594

Kenneth J. Bartschi, Esq.
Karen L. Dowd, Esq.
HORTON, SHIELDS & KNOX, P.C.
90 Gillett Street
Hartford CT 06105
Tel.: (860) 522-8338
Fax: (860) 728-0401

Maureen M. Murphy, Esq.
MURPHY, MURPHY & NUGENT, LLC
234 Church Street, 12th Floor
New Haven CT 06510
Tel.: (203) 787-6711
Fax: (203) 777-6442

Renee Redman, Esq.
AMERICAN CIVIL LIBERTIES UNION OF CONNECTICUT
32 Grand Street
Hartford CT 06106
Tel.: (860) 247-9823
Fax: (860) 728-0287

Jane Rosenberg, Esq.
Susan Cobb, Esq.
Robert Deichert, Esq.
Robert Clark, Esq.
OFFICE OF THE ATTORNEY GENERAL
55 Elm Street
Hartford CT 06106
Tel.: (860) 808-5318
Fax: (860) 808-5387

Judith A. Ravel, Esq.
LAW OFFICES OF JUDITH A. RAVEL
246 Goose Lane, Suite 201
Guilford CT 06437
Tel.: (203) 458-2300
Fax: (203) 458-8822

and to:

The Honorable Patty J. Pittman
Superior Court
Judicial District of New Haven
235 Church Street
New Haven, Ct 06510

William C. Heuer