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COLORADO SUPREME COURT 2 East 14th Avenue Denver, CO 80203	
Certiorari to the Colorado Court of Appeals, Case No. 2019CA1130 Appeal from Denver District Court, Honorable Judge David H. Goldberg District Court Case No. 2019CV30973	
Petitioners: CINDI MARKWELL, Secretary of the Senate, and LEROY M. GARCIA, JR., President of the Senate, v. **Respondents**: JOHN B. COOKE, Senator, ROBERT S. GARDNER, Senator, and CHRIS HOLBERT, Senate Minority Leader.	▲ **COURT USE ONLY** ▲
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GOVERNOR POLIS'S AMICUS CURIAE BRIEF SUPPORTING NEITHER PARTY

CERTIFICATE OF COMPLIANCE

I hereby certify that this brief complies with all requirements of C.A.R. 28(a)(2) and (a)(3), C.A.R. 32, and C.A.R. 29(d), including all formatting requirements set forth in these rules. Specifically, the undersigned certifies that:

☒ It contains 4,177 words (brief does not exceed half of 9,500 words).

I acknowledge that my brief may be stricken if it fails to comply with any of the requirements of C.A.R. 28(a)(2) and (a)(3), C.A.R. 32, and C.A.R. 29(d).

s/ Grant T. Sullivan
GRANT T. SULLIVAN

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Constitutions

Statutes

Other Authorities

INTRODUCTION

The Governor takes no position on who should win this case. Instead, the Governor submits this *amicus curiae* brief to alert the Court to an unrelated case that is pending in the court of appeals and which could be impacted significantly by the Court's ruling here. *See Rocky Mountain Gun Owners, et al. v. Polis ("RMGO")*, No. 20CA997.

In *RMGO*, two members of the House of Representatives sued to invalidate Colorado's Emergency Risk Protection Order ("ERPO") statute, § 13-14.5-101, *et seq*., C.R.S. (2020). The legislator-plaintiffs claimed that the chairperson presiding over the House of Representatives Committee of the Whole during the ERPO bill's consideration on second reading improperly denied their requests to have the bill read at length. Unlike this case, however, the legislator-plaintiffs in *RMGO* did not seek injunctive relief compelling that the ERPO bill be read at length. Instead, they asked the district court to strike down the ERPO statute in its entirety on purely procedural grounds, undoing the General Assembly's policy decision on important gun safety legislation.

The Governor moved to dismiss by arguing that the propriety of parliamentary rulings made by the House Committee of the Whole's presiding chairperson constitute nonjusticiable political questions. The district court agreed, finding that the legislator-plaintiffs' lawsuit "raises precisely the type of political question a disciplined judiciary, mindful of its place in the constitutional scheme of things, should avoid." *See Rocky Mountain Gun Owners, et al. v. Polis*, Denver District Court No. 2019CV31716 (May 19, 2020) (attached as *Exhibit A*).

Those same political question principles arise here. As such, this Court's analysis of the political question features may well impact the outcome of the court of appeals' decision in *RMGO*. The Governor provides this brief so the Court may have full information about pending cases raising the political question doctrine.

For the reasons discussed below, the Governor asserts in *RMGO* that the district court in that case correctly dismissed for lack of jurisdiction. The Governor files this brief to help show how the political question features discussed by the parties may apply in different scenarios outside the facts presented here.

STATEMENT

I. The Extreme Risk Protection Order statute

The ERPO statute, enacted under House Bill 19-1177, created a comprehensive process for the temporary removal of firearms from those who a court determines, after hearing, pose a significant risk of causing personal injury to themselves or others. § 13-14.5-103(3), C.R.S. (2020). The statute permits trial courts to enter an "Extreme Risk Protection Order," or "ERPO," following an adjudication that incorporates several due process protections, including the appointment of counsel. *See* § 13-14.5-104(1).[1]

According to the Colorado Courts E-filing system, 109 ERPO petitions have been filed in Colorado's trial courts since the legislation took effect on January 1, 2020.

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[1] "Red Flag" laws like the ERPO statute are immensely effective at reducing gun deaths. A study of Connecticut's law estimates that one suicide is averted for every 10 to 11 guns removed. Swanson, et al., *Implementation and Effectiveness of Connecticut's Risk-Based Gun Removal Law: Does it Prevent Suicides?*, 80 Law and Contemporary Problems 179, 203 (2017).

II. The Reading Requirement

Like most states, Colorado requires that bills introduced in the General Assembly be "read" before receiving a vote by legislators. The reading requirement states that each bill "shall be read by title when introduced, and at length on two different days in each house; provided, however, any reading at length may be dispensed with upon unanimous consent of the members present." Colo. Const. art. V, § 22.

The Colorado Constitution also gives the legislature the authority to make and enforce its own rules to govern its proceedings. Colo. Const. art. V, § 12. One such rule, House Rule 27(b), states that unanimous consent to dispense with the reading requirement "shall be presumed" unless a member requests that the bill be read at length on second or third reading.[2]

[2] The General Assembly's 2019 rules are available in Legislative Council Research Publication No. 671, *Colorado Legislative Rules* (updated July 2018). The current rules are available on the legislature's website: https://leg.colorado.gov/house-senate-rules. The rules cited in this brief have remained unchanged since July 2018.

III. Summary of *RMGO* District Court Proceedings

The plaintiffs' complaint in *RMGO* alleged that, during second reading in the House of Representatives, two representatives requested that the ERPO bill be read at length. The complaint alleged that the Chair of the Committee of the Whole denied one request, did not consider the other, and never read the bill at length in the House. The representatives' complaint did not state why the chair denied their reading requests.

Governor Polis moved to dismiss the complaint, arguing that it raised a nonjusticiable political question that was beyond the court's jurisdiction. The district court granted the Governor's motion, applying the familiar political question features from *Baker v. Carr*, 369 U.S. 186 (1962):

> Prominent on the surface of any case held to involve a political question is found [1] a textually demonstrable constitutional commitment of the issue to a coordinate political department; or [2] a lack of judicially discoverable and manageable standards for resolving it; or [3] the impossibility of deciding without an initial policy determination of a kind clearly for nonjudicial discretion; or [4] the impossibility of a court's undertaking independent resolution without expressing lack of the respect due coordinate branches of government; or [5] an unusual need

> for unquestioning adherence to a political decision already made; or [6] the potentiality of embarrassment from multifarious pronouncements by various departments on one question.

Id. at 217 (bracketed numbers added).

The district court found that *Baker*'s first, second, and fourth features counseled "forcibly" against the court going any further. Exhibit A at 11 (unpaginated). On the first feature, the court determined that the text of the Colorado Constitution commits to the legislature the power to enact laws and the authority to make rules and enforce its process. *Id.* On the second, the court explained no judicially discoverable or manageable standards exist to resolve the legislator-plaintiffs' claim that the chair acted improperly in denying their reading requests. *Id.* at 12 (unpaginated). Even if the court considered testimony, it could find "no guidance" on what standard it should apply to evaluate whether the chair's parliamentary rulings were proper. *Id.* And on the fourth feature, the court determined that subjecting the chair to judicial scrutiny and cross examination to explain his parliamentary rulings would "show disrespect due to [a] coordinate branch of government." *Id.* at 13 (unpaginated).

ARGUMENT

I. The judiciary lacks jurisdiction under the political question doctrine to review the legislature's internal parliamentary rulings.

In Colorado, the political question doctrine establishes that certain disputes present nonjusticiable political questions that "should be eschewed by the courts." *Colo. Common Cause v. Bledsoe*, 810 P.2d 201, 205 (Colo. 1991) (quotations omitted). The judiciary's avoidance of deciding political questions finds its roots in the Colorado Constitution's provisions separating the powers of state government. Colo. Const. art. III; *Lobato v. State*, 218 P.3d 358, 368 (Colo. 2009); *Bledsoe*, 810 P.2d at 205. The doctrine recognizes that some issues are best left for resolution by the political branches of government, or "to be fought out on the hustings and determined by the people at the polls." *Bledsoe*, 810 P.2d at 205 (quotation omitted).

Colorado has adopted the well-known *Baker v. Carr* test for determining whether a controversy presents a nonjusticiable political question. *Bledsoe*, 810 P.2d at 205 (Colo. 1991) (citing *Baker*, 369 U.S. at 186). *Baker* identifies six "features," quoted above at pages 5 and 6, that

characterize a case raising a nonjusticiable political question. *Baker*, 369 U.S. at 217.

These features are "probably listed in descending order of both importance and certainty." *Vieth v. Jubelirer*, 541 U.S. 267, 278 (2004) (plurality opinion). Each is its own "independent test[ ]," *id.* at 277, and the presence of any one feature demonstrates a nonjusticiable political question. *Lobato v. State*, 216 P.3d 29, 37 (Colo. App. 2008), *rev'd on other grounds*, 218 P.3d 358 (Colo. 2018).

The Governor below briefly analyzes *Baker*'s first, second, and fourth features—those relied on by the district court in *RMGO*—as applied to requests for judicial review of the General Assembly's internal parliamentary rulings.

A. The Colorado Constitution's text commits to the legislature questions about its internal procedures.

The Colorado Constitution commits to the General Assembly issues about its internal rules of procedure. Colo. Const. art. V, § 12 ("Each house shall have power to determine the rules of its proceedings ... to enforce obedience to its process … [and] all other powers necessary

for the legislature of a free state."). This structure mirrors the federal Constitution's textual commitment of legislative procedural rules to Congress. *See Consejo de Desarrollo Economico de Mexicali, A.C. v. United States*, 482 F.3d 1157, 1172 (9th Cir. 2007) ("[T]he Constitution textually commits the question of legislative procedural rules to Congress."). As a co-equal branch, the General Assembly's power to act under its own procedural rules is "plenary" and "exclusive." *In re Speakership of the House of Representatives*, 25 P. 707, 710 (Colo. 1891).

Even where the constitution mandates that the legislature take particular action, the "form and manner" of fulfilling the requirement "is left wholly to the legislative body." *People ex rel. Manville v. Leddy*, 123 P. 824, 827 (Colo. 1912). The General Assembly "must judge for itself" compliance with its own internal procedural rules; the courts will "not inquire into the motive or cause" that might have influenced the legislature's actions taken in pursuit of its own rules. *In re Speakership*, 25 P. at 710. "[I]f a wrong or unwise course be pursued, there is no appeal under our system of government except to the ballot box." *Id.* The judiciary's role is therefore "limited to measuring legislative

enactments against the standard of the constitution." *Bledsoe*, 810 P.2d at 210. It does not encompass determining whether the legislature complied with its own internal rules. *See id.* at 213 ("[T]he judiciary's authority to coerce legislators to comply with constitutional provisions governing the enactment of legislation is exceedingly limited.").

As the district court in *RMGO* correctly recognized, allowing a court challenge to the legislature's parliamentary rulings to proceed would contravene the constitution's text and structure separating the branches. "Very little could be more explicit in the plain language of the Colorado Constitution," the *RMGO* court explained, "than the legislature passes laws ... and that, in this case, the House is granted authority to make it[s] rules and enforce its process." Exhibit A at 11 (unpaginated) (citing Colo. Const. art. V, §§ 1, 12). Were the court to delve into the merits of such a claim, it would violate basic tenets of the separation of powers doctrine—something a "disciplined judiciary, mindful of its place in the constitutional scheme of things, should avoid." *Id.*

While the political question doctrine is often difficult to apply depending on the specific facts at issue, the doctrine at minimum prevents the judiciary from substituting its judgment for the legislature's on matters involving on-the-spot parliamentary rulings that call for the exercise of discretion and judgment. Take the *RMGO* case as an example. The *RMGO* complaint alleged that the chair heard and denied the legislator-plaintiffs' requests for a full reading but does not state why the chair denied them. Any number of legitimate grounds may have supported the chair's denial. Were the requests for a full reading made out of order? *See* House Rule 10 ("Questions of order shall not be debatable"). Did the requesting members fail to make the request in the proper form? *See* House Rule 13(a) ("No member rising to ... make a motion ... shall proceed before addressing and being recognized by the chair"). Did they violate decorum rules against engaging in "personalities" or going outside the question under debate? House Rule 23(d).

These are difficult procedural questions for any legislative chairperson to navigate when managing proceedings on the House or

Senate floor. But they are nearly impossible for a court to evaluate after the fact based on secondhand eyewitness testimony or a cold record. Under the political question doctrine, however, the judiciary is not burdened with wading into this parliamentary fray. Constitutional text commits the answers to these questions to the House itself. *See* Colo. Const. art. V, § 12; *cf. Consejo*, 482 F.3d at 1172.

This type of bright line, as drawn by the *RMGO* court, sensibly avoids the judiciary second guessing routine parliamentary decisions made by the presiding chairperson. *See Bledsoe*, 810 P.2d at 208 ("[W]e have unwaveringly held that courts may not interfere with legitimate legislative activities."); *Lewis v. Denver City Waterworks Co.*, 34 P. 993, 994 (Colo. 1893) (stating the judiciary "has no direct control over the legislative department" and each is "independent within its appropriate sphere"). Were it otherwise, the courts could become unwieldy political forums for challenging the most garden variety of parliamentary rulings made in the House and Senate, not to mention the thousands of parliamentary rulings made by county and local legislative bodies across Colorado. And it would encourage participants to wait and raise

objections after the political process concluded—as the plaintiffs in *RMGO* did—rather than raise them in a way to allow the legislature to resolve them so the process can continue. Under the political question doctrine, such intra-legislative quarrels fall outside the courts' jurisdiction.

Against this backdrop, courts applying the political question doctrine often hold that the proper interpretation and application of the legislature's procedural rules present nonjusticiable political questions. These courts decline to construe rules governing not only run-of-the-mill legislative business, *see, e.g., Tallarino v. Oneida Cty. Bd. of Legislators*, 132 A.D.3d 1394 (N.Y. App. Div. 2015) (committee assignment rules); *Des Moines Register & Tribune Co. v. Dwyer*, 542 N.W.2d 491, 496–502 (Iowa 1996) (rules for the release of legislative telephone records); *Abood v. League of Women Voters of Alaska*, 743 P.2d 333, 336–40 (Alaska 1987) (rules governing access to legislative meetings), but also rules that implement constitutional provisions like House Rule 27(b) here. *See Nixon v. United States*, 506 U.S. 224, 228-36 (1993) (impeachment proceeding rules); *Gunn v. Hughes*, 210 So.3d 969 (Miss.

2017) (procedures for reading requirement); *Gray v. Gienapp*, 727 N.W.2d 808, 812–15 (S.D. 2007) (rules for qualifications and expulsion of members); *State ex rel. Spaeth v. Meiers,* 403 N.W.2d 392, 394 (N.D. 1987) (rules for supermajority approval of certain bills); *Gilbert v. Gladden*, 432 A.2d 1351, 1354–55 (N.J. 1981) (rules for the presentment of bills to the Governor).

Gunn, also involving a constitutional reading requirement, is most relevant here. 210 So.3d 969. In that case, a legislator objected to the reading method employed by the Mississippi legislature and obtained a temporary restraining order from a lower court. *Id.* at 971. But the Mississippi Supreme Court reversed based on the state constitution's "absolute separation of powers." *Id.* at 973. Applying *Baker*'s first feature, the court explained that the lower court was without discretion to intrude upon "legislative procedural matters." *Id.* at 974. Instead, the constitution's text obligates the legislature to read bills, which "necessarily commits upon the Legislature the obligation to determine how that requirement will be carried out." *Id.*

The same analysis applies in Colorado. The Colorado Constitution imposes on the legislature the procedural task of reading bills before granting final passage to such bills. *Compare* Colo. Const. art. V, § 22, *with* Miss. Const. art. IV, § 59. This "necessarily commits" to the General Assembly the job of determining how to do that. *Gunn*, 210 So.3d at 974. Once coupled with the Colorado legislature's "exclusive" and "plenary" power to make and enforce its own rules of procedure, *In re Speakership*, 25 P. at 710, the answer becomes clear: only the legislature can determine how its rules governing the legislative procedure for reading bills fit together and overlap with its other legislative rules governing parliamentary procedures. These are issues inherent not to the laws enacted by the General Assembly but to the *process* by which they are enacted.

As the Court considers this case, it should make clear—consistent with the weight of this authority—that requests for the judiciary to review a legislature's discretionary parliamentary rulings governing its internal procedures present nonjusticiable political questions.

B. No judicially discoverable or manageable standard exists for reviewing the legislature's parliamentary rulings.

Baker's second feature confirms that requests for judicial review of legislative parliamentary rulings present nonjusticiable political questions beyond the judiciary's jurisdiction.

The crux of *Baker*'s second feature is that a court's legal decision must not be rudderless. As the U.S. Supreme Court has said, "judicial action must be governed by *standard*, by *rule*." *Vieth*, 541 U.S. at 278 (plurality opinion). While laws promulgated by the legislature may be "inconsistent, illogical, and ad hoc," laws pronounced by the court must be "principled, rational, and based upon reasoned distinctions." *Id.*; *see also Powers v. Harris*, 379 F.3d 1208, 1222 (10th Cir. 2004) (applying *Vieth*); *Schroder v. Bush*, 263 F.3d 1169, 1175 (10th Cir. 2001) (applying *Baker*'s second feature).

When such limits prove elusive, as with political disputes, the court must avoid the question and decline jurisdiction. *See O'Connor v. United States*, 72 Fed. App'x 768, 771 (10th Cir. 2003) (declining jurisdiction because the court could "identify no judicially discoverable

standards that would permit [it] to determine whether the intentions of the president in prosecuting a war are proper."). A court intervening in such disputes with uncertain limits risks "assuming political, not legal, responsibility for a process that often produces ill will and distrust." *Vieth*, 541 U.S. at 307 (Kennedy, J., concurring in the judgment).

The facts in *RMGO* illustrate well the difficulty of the judiciary trying to fashion relief without a manageable legal rule. The district court in *RMGO* rightly acknowledged that, if the case were to proceed, it could find no guidance on what legal standard it should apply to determine whether the legislator-plaintiffs followed the House's rules in making their requests or whether the chair acted properly in denying them. Exhibit A at 12 (unpaginated). The district court acknowledged that it could hear testimony from eyewitnesses and perhaps experts on legislative procedure, but it explained such testimony would provide no discernable legal standard. Instead, the court would be left to merely "substitute its ruling for the Chair's on issues placed squarely within the House's constitutional bailiwick." *Id.*

The *RMGO* court's analysis under *Baker*'s second feature highlights the unique problems posed when disappointed legislators ask the courts to review the legislature's rulings on parliamentary points of order. Nothing in the General Assembly's rules or Colorado law supplies a workable legal standard for courts to resolve procedural disputes arising on the House or Senate floor. If a representative requests a full reading under House Rule 27(b), for example, but the chair rules it out of order under House Rule 10 for reasons of decorum, which rule prevails? No one can seriously dispute that the House rather than the judiciary should provide the answer.[3] *See People ex rel. O'Reilly v. Mills*, 70 P. 322, 323 (Colo. 1902) (legislature's lawmaking power "must be left untrammeled").

A legislative body's procedural rules generally derive from, among other sources, "[c]ustoms," "general usage," and "experience," Mason's Manual of Legislative Procedure § 4 (1989), not statutory language or

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[3] Even if one might argue that a reading request under House Rule 27(b) must prevail because it is of constitutional origin, that argument fails. All rights, even constitutional rights, may be subject to reasonable restrictions, including time, manner, and place restrictions. *See, e.g.*, *Rocky Mountain Gun Owners v. Polis*, 2020 CO 66, ¶ 78; *Hill v. Thomas*, 973 P.2d 1246, 1257 (Colo. 1999).

court precedent that is susceptible to judicial application. The judiciary is thus ill-equipped, institutionally and practically, to decide questions of parliamentary procedure. *Cf. Schroder*, 263 F.3d at 1175 (citing *Baker* and explaining, "Courts are ill-equipped to make highly technical, complex, and on-going decisions regarding how to maintain market conditions, negotiate trade agreements, and control currency.").

The lack of any judicially discoverable or manageable legal standard is compounded by still another problem—legislative immunity. While a legislator in this case voluntarily agreed to testify in court, that will not always be the case. In Colorado, courts cannot force legislators to testify about their legislative duties and actions. Colo. Const. art. V, § 16; § 2-2-304, C.R.S. This immunity is yet another building block that forms the separation of powers doctrine. Legislators are "privileged" "for any speech or debate" and "shall not be questioned in *any other place*." Colo. Const. art. V, § 16 (emphasis added). The privilege prevents judicial inquiry into not only a legislator's speech and debate, but also "any other legislative activity" related to any "legislative measures." § 2-2-304. This broad immunity is "construed

liberally" to prevent "judicial and executive interference" with legislators in the conduct of their official duties. *Bledsoe*, 810 P.2d at 209.

Were the Governor forced to defend on the merits in *RMGO*, for example, this expansive immunity may preclude him from calling the House's chairperson to testify why he ruled as he did. In that event, the district court would have an incomplete factual picture, preventing it from determining on a full record whether the chair's rulings were proper, even assuming the court could glean an appropriate legal standard to apply in the first place. This practical problem provides yet another reason to hold that the propriety of legislative parliamentary rulings constitutes a nonjusticiable political question.

C. Requiring legislators to explain their procedural rulings to the judiciary would show a lack of respect owed to a coordinate branch.

Colorado's appellate courts have not previously addressed *Baker*'s fourth feature, but other courts use it to decline jurisdiction in at least two scenarios: (1) when a court is asked to construe a legislature's internal rules to invalidate certain legislative actions, *see, e.g.*, *Common*

Cause v. Biden, 909 F. Supp. 2d 9, 31 (D.D.C. 2012); *Smigiel v. Franchot*, 978 A.2d 687, 701 (Md. 2009); and (2) when a court is asked to impute a motive to the legislature for acting or failing to act, *see, e.g.*, *State, Dep't of Natural Resources v. Tongass Conservation Soc'y*, 931 P.2d 1016, 1019–20 (Alaska 1997).

Asking the judiciary to scrutinize a legislative chairperson's rulings on points of order or other procedural decisions implicates both scenarios, counseling against judicial intervention. On the first, any request to judicially review the legislature's parliamentary decisions necessarily seeks to invalidate some consequence resulting from that decision. As an example, the legislator-plaintiffs in *RMGO* are asking the judiciary to interpret and apply the House's internal procedural rules to determine that the chair improperly denied their reading requests, therefore requiring invalidation of Colorado's ERPO statute. But doing so presents "acute problems," given the House's "independence in determining the rules of its proceedings and the novelty of judicial interference with such rules." *Common Cause*, 909 F. Supp. 2d at 31 (quotations omitted). Indeed, it would be "*impossible* to overturn [the chair's] parliamentary

ruling ... without expressing disrespect for [the General Assembly]" as a co-equal branch. *Brown v. Owen*, 206 P.3d 310, 318 (Wash. 2009) (emphasis added).

On the second, any lawsuit seeking to overturn parliamentary rulings made on the House or Senate floor necessarily imputes an improper motive to the legislative chamber. In the context of the reading requirement, such a lawsuit assumes either that the chair sought to rush the bill through and flout the constitutional reading requirement or, at best, that the chair was negligent and overlooked the reading requirement. But the chair may deny a legislator's reading request for any number of legitimate procedural reasons already discussed. The chair's decision denying a legislator's reading request on those or other proper grounds would provide no basis for invalidating any statute that was ultimately produced from those legislative proceedings. Only *improper* motivations by the chair may arguably lead to a statute's invalidation.

Thus, by necessity, a legislator-plaintiff challenging a parliamentary ruling made in the House or Senate seeks to ascribe

improper motives to the General Assembly's procedural decisions. Such inquiries into legislators' motives endanger "the separation of powers doctrine, representing a substantial judicial 'intrusion into the workings of other branches of government.'" *Tongass Conservation Soc'y*, 931 P.2d at 1019 (quoting *Vill. of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 268 n.18 (1977)); *accord In re Speakership*, 25 P. at 710 ("[T]he court will not inquire into the motive or cause which influenced the action of the legislative body").

Accordingly, *Baker*'s fourth feature reinforces that lawsuits challenging the legislature's parliamentary rulings present nonjusticiable political questions.

CONCLUSION

Whether the political question doctrine removes a court's jurisdiction is highly fact-specific and will inevitably vary from case to case. At minimum, however, the doctrine counsels against the judiciary substituting its judgment for the legislature's on parliamentary points of order that call for the exercise of judgment, legislative discretion, as well as custom and tradition. Regardless of the ultimate outcome here,

this Court's decision should embrace these separation of powers principles and leave sufficient flexibility in its holding to allow lower courts to address future disputes under the political question doctrine based on each case's unique facts.

Respectfully submitted this 22nd day of December, 2020.

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CERTIFICATE OF SERVICE

This is to certify that I have duly served the within **GOVERNOR POLIS'S AMICUS CURIAE BRIEF SUPPORTING NEITHER PARTY**, upon all parties herein electronically via Colorado Courts E-filing, at Denver, Colorado, this 22nd day of December, 2020 addressed as follows:

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