

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:24-cv-00913

GAYS AGAINST GROOMERS, a non-profit corporation;  
ROCKY MOUNTAIN WOMENS NETWORK, an unincorporated association;  
RICH GUGGENHEIM, an individual; and  
CHRISTINA GOEKE, an individual,

Plaintiffs,

v.

LORENA GARCIA, in her individual and official capacities as a Colorado State Representative;  
MIKE WEISSMAN, in his individual and official capacities as a Colorado State Representative and Chair of the House Judiciary Committee;  
LESLIE HEROD, in her individual and official capacities as a Colorado State Representative;  
JULIE GONZALES, in her individual and official capacities as a Colorado State Senator and Chair of the Senate Judiciary Committee; and  
DAFNA MICHAELSON JENET, in her individual and official capacities as a Colorado State Senator,

Defendants.

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**DECLARATION OF CHRISTINA GOEKE**

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I, Christina Goeke, hereby declare that:

1. I am an adult and am competent to make this declaration, which is based on personal knowledge.
2. I reside in Colorado Springs, Colorado, which is located in El Paso County.
3. I have a degree in biology. I also participate in female-only competitions in jiu-jitsu and powerlifting as a hobby. In addition, I use my free time to engage in activism in the form of advocating for female safe spaces – such as bathrooms, prisons and sports

– and against men being allowed into those spaces.

4. I am the co-founder of Rocky Mountain Women’s Network (RMWN). RMWN is an unincorporated association whose mission is to advocate for and protect women’s and girl’s sex-based rights. Its members reject transgender ideology, including the concepts of misgendering or deadnaming. RMWN has active members in Colorado, including myself.

5. I do not hate anyone for believing they are “trans.” I do not care if adults want to have drag shows for other adults. I do not care how adults choose to refer to themselves. What I am opposed to is forcing others to speak in support of, or in accordance with, a particular ideology. I am opposed to exposing children to concepts beyond their maturity level, like sexuality, through things like drag shows or school curriculums.

6. I am also opposed to allowing ideologies to impose policies on others that put women in danger or ignore the biological and physical differences between men and women. As a strength athlete and Brazilian Jiu Jitsu competitor, I see and experience the physical differences between males and females. More and more frequently, the female powerlifting competitions are being invaded by men who pretend to be women and take advantage of their immutable strengths to take winner titles away from female competitors.

7. These beliefs were the reason I, on behalf of myself and RMWN, decided to testify in opposition to HB24-1071 during Colorado’s 74<sup>th</sup> legislative session.

8. HB24-1071, which is officially titled “Name Change to Conform with Gender Identity,” is referred to by its sponsors and supporters as “Tiara’s law.” I believe that the

bill seeks to make it easier for those with felony criminal records to change their name so long as they claim to be transgendered.

9. I oppose HB24-1071 because being trans is not a valid reason to allow a felon to change their name. Women's safety matters, and one of the ways that women stay safe in the current world is by looking up people who come into their lives by name. HB24-1071 effectively gives felons a loophole to exploit by claiming to be trans and then being rewarded with a new name that renders zero hits in a web search. It allows trans felons to become a part of a woman's life as employers, employees, friends, romantic partners, or their children's caregivers without that woman ever getting to make an informed decision in the matter. The reality is that, in the world today, women must take extra precautions to remain safe that men could not understand; Tiara's law takes one of those precautions away.

10. HB24-1071 was named "Tiara's Law" after a man named Duane Powell, also known as Duane Kelley, who claims to be trans and goes by the name Tiara Latrice. I received copies of Duane Powell's criminal history from two different journalists, who had obtained the records from Truthfinder.com and an OSINT report. Those records reflect that Powell has a long criminal history of arrests and convictions including for cocaine distribution, lewdness, domestic abuse, exposing genitalia, prostitution, forgery, providing false information to police and driving without a valid license. Powell currently works at a drag production company he founded where he organizes, and hosts, drag and burlesque shows that sometimes feature children.

11. For example, on January 21, 2024, Powell co-hosted an all-ages drag show in Colorado Springs at the La Burla Bee Burlesque House. Three children performed on

the stage during that show alongside a drag queen known as “Connie Lingus” – a euphemism for oral sex. Bunny Bee, the owner of the Burlesque House, was also present at the event and has been known to perform dance routines in front of children in nothing but a thong and tasseled pasties on her nipples.

12. Powell’s background – as well as his demonstrated interest in exposing children to mature, sexualized content – is the perfect example of why the law should not make it harder for women to figure out who they are allowing into their lives or the lives of their children and loved ones.

13. On January 26, 2024, I signed up online to testify on behalf of myself and RMWN before the House Judiciary Committee in person and in opposition to HB-24-1071.

14. The House Judiciary Committee heard public testimony on HB-24-1071 on January 30, 2024.

15. When HB-24-1071 came up for discussion, Defendant Rep. Garcia, one of the bill’s prime sponsors, thanked her colleagues “for engaging in respectful discourse by not using derogatory language or misgendering witnesses, or using a witness’s deadname. But rather referring to the witnesses as their stated names and gender pronouns.” She added, “I sincerely hope that the witnesses signed up to also testify will follow suit, and engage in respectful discourse and share their perspectives and opinions on this bill by not disparaging other members or our community or other witnesses,” because “this room is one where people should be able to come, share their stories, be who they are, without fear of being attacked, without fear of being disparaged.”

16. House Judiciary Committee Chair Rep. Mike Weissman then adopted these

sentiments as rules for the public comment portion of the hearing, stating: “I appreciate your comments about the tenor that we should aspire to and the way that we should and should not aim to have a discussion, and as Chair I affirm and ratify your comments.”

17. I consider adherence to a trans person’s pronoun preferences, assumed gender, or assumed name to be a form of lying. I do not abide by the pronoun rituals performed by trans ideologists, nor do I believe deadnaming and misgendering are valid concepts. Sex matters. It matters whether someone is a man or woman in many contexts, such as public bathrooms, prisons, locker rooms, sports teams, and when obtaining medical treatment. I refuse to lie and call someone a woman when he is a biological man. I do not care how he identifies himself, but I do care when I am forced to identify him in a certain way.

18. Upon hearing Rep. Garcia and Rep. Weissman’s rules, I had a feeling that my planned statement was not going to be well-received. Nonetheless, I patiently waited for my turn to speak in opposition to the bill.

19. As I waited, I looked at my Instagram account on my phone and I noticed that Duane Powell (also known as Duane Kelley or “Tiara”), who was sitting three rows directly in front of me, was actively making comments on a recent Instagram post I had made about the hearing. His posts appeared argumentative, such as asking me “Have you even READ THE BILL?” or stating, “It’s so funny to me that THE ONLY PEOPLE who think of children in a sexual way or are so fascinated with kids’ genitalia are you weirdos!!!” After multiple posts, I responded online that “I’m sitting right behind you. You can say it to my face.” Powell, or one of his friends, then complained to the sergeant at

arms, who removed me from the room to admonish me in vague terms such as, “We’re not having that, we don’t need any drama here.” But since I had done nothing, I was allowed to re-enter the hearing. To me, this incident is an example of the pro-trans community, and Duane Powell specifically, attempting to target me and exclude me from participating in public comment on terms equal to other Coloradans.

20. Finally, Rep. Weissman gave me the go ahead to provide my testimony. I began by identifying myself and stating I was the cofounder of RMWN. I then began to speak about the reasons for my opposition to HB24-1071, starting with the reasons I provided above regarding the threat to women’s safety. I then started to speak about Duane Powell, to explain that his criminal history was a good example of why a felon should not be able to easily change their name. But, when I did so, I was only able to state that “The person who this bill is being named after, you know, they’re an admitted former prostitute . . .” before Rep. Weissman cut me off. He chastised me to keep my testimony “to the bill” to which I responded that the “bill [was] literally named after him.”

21. As soon as I referred to Duane Powell, a biological male, as “him,” pro-trans members of the crowd behind me erupted into boos and hisses. Rep. Weissman did not ask them to stop or admonish them in any way, despite the fact that the House rules on decorum specifically prohibit such conduct. *See House Guide to Public Hearings*, Colorado General Assembly, <https://perma.cc/5L6L-GRBQ>.

22. While this occurred, Defendant Rep. Herod, who had not been seated or listening to my testimony prior to this, came in from a side door just as I was explaining that sex matters and I was correctly referring to Powell as “him.” As Rep. Herod walked in, she began communicating across the room to the sergeant at arms using hand gestures.

Specifically, she pointed towards me and then pointed to the door leading out of the room apparently ordering him to remove me from the room.

23. I then attempted to go back to what I was saying – that the person this bill was named after is an admitted former prostitute. As I began to speak, Rep. Herod yelled “stop!” As I reached the end of my sentence, Rep. Herod then pulled her microphone towards her and stated “I’m not going to allow that. You [Rep. Weissman] gave her too many warnings.”

24. Rep. Weissman, at Rep. Herod’s urging, then stated that the “committee [was] going to be in recess” and loudly brought down his gavel, effectively ending my time to speak 31 seconds early.

25. I continued attempting to state my opinions about the bill after my time had been stopped and we were off the record. After Rep. Weissman had terminated my time, I expressed, in frustration, that I had “let [the proponents] spew their bullshit about gender” and it was unfair that I was not allowed to speak truthful facts about gender during my own time. As I said this, Rep. Herod screamed at me to “stop!” at the same time the sergeant at arms came up to me stating “okay we’re done” and told me I had to leave, which I did.

26. Each speaker during the public testimony portion of the hearing was allotted three minutes of speaking time. There was a timer at the front of the room showing the remaining speaking time. When Rep. Weissman gavelled us into recess, there were approximately 31 seconds left of my speaking time. Unlike the speakers who favored HB24-1071, I was not allowed to complete my full three-minute speech.

27. I have read the transcript of the January 30, 2024 hearing at the House Judiciary

Committee regarding HB24-1071, which is attached as Exhibit B to the Complaint. I can confirm it is a true and accurate transcription of the statements made on the record at the hearing, up to the point where Rep. Weissman gaveled us into recess. The transcript does not reflect what I said off the record.

28. Exhibit E is a true and correct copy of a video of a portion of my testimony at the January 30, 2024 hearing at the House Judiciary Committee regarding HB24-1071, leading up to the point when Rep. Weissman gaveled the hearing into recess while I was still speaking. The video was made by a member of the public and accurately depicts my testimony, the interruptions by Defendants, the hissing and booing by members of the pro-trans community, and the time period immediately after my speech was cut off and I expressed frustration. The portion of the video depicting what I said after Rep. Weissman recessed the hearing is not captured in the official audio record posted by the legislature. A copy of that video can also be found at <https://bit.ly/3TXu1BG>.

29. On March 27, 2024, the Senate Judiciary Committee held a hearing on HB-24-1071, which provided for public comment. I had signed up a few days before the hearing to speak in-person and in opposition to the bill on behalf of myself and RMWN.

30. At the opening of public comment about the bill, Chair Sen. Gonzalez announced that she would not allow witnesses to fail to treat others with dignity and respect or a lack of decorum and threatened to have witnesses removed if they failed to exhibit decorum, dignity, or respect. She also forbade those present from recording the proceedings.

31. Sen. Michaelson Jenet spoke next and purported to “elevate” the words of Sen.



Gonzalez by announcing that witnesses should not use “derogatory language,” “misgender” or “deadname” or otherwise “disparage” those present.

32. Sen. Gonzalez adopted Sen. Michaelson Jenet’s speech restrictions by stating that she appreciated that addition to the rules or decorum, dignity and respect and asked witnesses to adhere to those restrictions.

33. Once again, hearing those speech restrictions gave me concern that I would not be able to fully express my opposition to the bill. But, when my name was called, I attempted to give my statement as planned. Like the previous hearing, each speaker during the public testimony portion of the Senate Judiciary Committee Hearing was allotted three minutes to speak.

34. I began my statement much like the one I had tried to give to the House Judiciary Committee. I introduced myself and stated I was the cofounder of RMWN. I stated my belief that allowing felons to conceal their criminal history would endanger single moms, young women, or children. I then attempted to make my point about Powell’s criminal background. But I only got so far as to mention “Mr. Duane Powell” before Sen. Gonzalez gaveled me down and interrupted me.

35. As Sen. Gonzalez gaveled me, she turned and said something to the person next to her, who appeared to be handling the audio recording and time clock.

36. I tried to continue to speak – given I only had a short three minutes to do so – and express my opinion that Duane Powell was impersonating a woman and had appropriated a female name in order to hide his former crimes. Sen. Gonzalez continued to speak over me and try to interrupt my time. She reprimanded me that the Senate Judiciary Committee did not allow “misgendering or deadnaming” to which I then

had to defend myself against and explain that I refused to lie about biological realities. I informed her “You are violating my First Amendment rights if you tell me that I cannot call a man a man.”

37. Sen. Gonzalez interrupted me again saying “Welcome. Thank you for being here. If you would like to proceed with the remainder of your time, you certainly can. You have 24 seconds remaining.”

38. But as I tried to speak again about Powell’s criminal history, Sen. Gonzalez immediately started to bang her gavel again and dismiss me loudly with a “thank you” so as to drown out my attempt to finish my testimony. I was not able to complete the full three minutes of my testimony.

39. I learned later that a large portion of my testimony – everything after I first uttered Duane Powell’s name—was erased from the Senate’s official, publicly available audio. See [https://sg001-harmony.sliq.net/00327/Harmony/en/PowerBrowser/PowerBrowserV2/20240403/41/15772#agenda\\_](https://sg001-harmony.sliq.net/00327/Harmony/en/PowerBrowser/PowerBrowserV2/20240403/41/15772#agenda_) (timestamp: 6:34:28PM to 6:36:34PM). At no time during my public comment did Sen. Gonzalez, or anyone, call for a recess and I did not hear anyone ask for the recording to be cut. I have listened to the recording and there is now approximately two minutes and six seconds of silence in place of where I had been attempting to give my speech, while being interrupted by Sen. Gonzalez.

40. I have read the transcript of the official audio of the March 27, 2024 hearing at the Senate Judiciary Committee regarding HB24-1071, which is attached as Exhibit C to the Complaint. I can confirm Exhibit C is a true and accurate transcription of the statements made at the hearing up to the point where the audio recording of my speech

was erased. About two minutes of my attempted speech are missing, including Sen. Gonzalez interrupting me and trying to impose her speech restrictions on me.

41. I have read the transcript of the erased portion of my testimony from the March 27, 2024 hearing at the Senate Judiciary Committee regarding HB24-1071, which is attached as Exhibit D to the Complaint. I can confirm it is a true and accurate transcription of the statements made that were erased from the public record.

42. I have also listened to the unofficial audio of my speech, a true and correct copy of which is located at <https://bit.ly/4akyMvP>, from which the transcript that is marked as Exhibit D was made. I can confirm that the audio between timestamps 31:42 – 35:03 accurately records my speech, including the portions of my speech that were erased from the official audio record and includes Sen. Gonzalez attempting to enforce the speech restrictions against me.

43. I have also watched a video recording of my speech, a true and correct copy of which is located at <https://bit.ly/3TUdgr6>, which depicts all of the events that occurred while I gave, or attempted to give, my speech. I can confirm that it accurately depicts the events that occurred during my speech, including the portions of my speech that were erased from the official audio record and Sen. Gonzalez's actions and words in attempting to enforce the speech restrictions against me. In the background the video also shows one member of the audience raising his arms during my speech. The person shown on the video appears to me to be Eli Bazan, a founder of Parasol Patrol, a pro-trans group.

44. I noticed that, during the hearing, proponents of the bill were not interrupted or silenced. And no one asked Eli Bazan not raise his hands during my speech.

45. The General Assembly is currently still in session and there is at least one more bill remaining that concerns transgender issues: SB24-189—Gender-Related Bias-Motivated Crimes.

46. Also, HB-24-1040, titled “Gender-Affirming Health-Care Provider Study,” has been removed from further consideration during this session, but it may re-appear again in a future session.

47. Regardless, transgender issues are a consistent subject matter during recent sessions of the Colorado General Assembly, which has demonstrated a continued interest in addressing these topics. Indeed, many legislators have loudly and proudly committed to advancing the cause of the transgender movement in forthcoming legislative bills. Based on my experience and personal knowledge of pro-trans, progressive Colorado legislators and their stated legislative goals, I have no doubt that, going forward, debates that concern or touch on transgender ideology will continue to arise in the House and Senate.

48. I intend on continuing to oppose trans ideology and advocate for the rights of women and girls, including by providing public testimony on trans-related and other bills during legislative committee hearings, including during future legislative sessions. I want to be allowed to testify truthfully about trans issues, including making public comments at legislative hearings. I expect that Defendants will continue to censor me during testimony, interrupt me, steal my testimony time, and require that I express fealty to trans ideology.

49. It is important for me speak truthfully and authentically on these issues because I think that the transgender movement is a political movement that seeks the erasure of

sex-based rights, and it does so by weaponizing empathy and speech restrictions. I personally believe that trans persons are sex mimics, who are impersonating women and appropriating their characteristics, which I find dishonest and offensive.

50. It is my view that the concepts of “misgendering” and “deadnaming” are ideological concepts, used by trans sex mimics to impose their views on others and force other people to accept their self-conception of themselves. I refuse to give into trans ideology and call a man a woman or avoid using someone’s legal name, just because they want to mimic being a different sex. Making me use preferred pronouns or fake names for people is making me agree with trans ideology, which is something that I strongly disagree with. I find it degrading for me to use a sex mimic’s assumed name and pronouns.

51. I also believe that it is important for people to understand who Duane Powell really is. The proponents named HB24-1071 by informally calling it “Tiara’s law.” I believe it is deceptive to call it “Tiara’s law” because that is not his real name, and it masks his criminal history. Calling it “Tiara’s law” makes the bill sound harmless, even “sparkly” or “fun.” Duane Powell is a felon and a man and there is nothing wrong with speaking honestly about that.

52. Without the Court’s intervention, I will have to censor myself at future legislative committee hearings in order to avoid having my right to speak and petition restricted. My only choices are to refrain from providing public comments entirely, so I do not have to make ideological statements I disagree with or modify my speech to conform with Defendants’ demands and avoid being interrupted, gavelled down, ejected, or having my testimony edited.

53. In other words, if Defendants' unlawful policies and practices remain in place, I will be speaking less, or differently, than I want to about important public issues involving trans issues and women's rights.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 15, 2024.

s/Christina Goeke  
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CHRISTINA GOEKE