

EUROPEAN COURT OF HUMAN RIGHTS  
COUR EUROPÉENNE DES DROITS DE L'HOMME

T : +33 (0)3 88 41 20 18  
F : +33 (0)3 88 41 27 30  
www.echr.coe.int

Dlui av. Marian MACOVEI  
MACOVEI și ASOCIAȚII SCPA  
Str. Principatele Unite nr. 38/40 ap. R47  
BUCUREȘTI sector 4  
ROUMANIE

**FOURTH SECTION**

ECHR-LE4.5P3  
IBA/aun

10 February 2021

**By post and fax (+40 213 13 75 88)**

**Application no. 5926/20 – S.K.K. and A.C.G. v. Romania**  
**and 7 other applications (see list appended)**

Dear Sir,

I enclose for your information a copy of the applicants' comments in reply to your submissions on the applications listed in the appendix.

Yours faithfully,

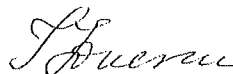
Andrea Tamietti  
Section Registrar

Enc.

IN THE CASE OF *S.K.K. AND A.C.G. v. ROMANIA* (5926/20) AND 7 OTHER  
APPLICATIONS

WRITTEN OBSERVATIONS IN REPLY TO THIRD-PARTY INTERVENERS

- [1]. The applicants respectfully submit that the arguments put forward by Ordo Juris, AFR and Provita București are contrary to human rights standards previously affirmed by this Court and they have been debunked by entire series of research and studies from various disciplines – medical studies, psychology, sociology, and law. Continuing to advance this type of assertions that have been found to be based on homophobia, prejudice and discrimination represents an incitement to discrimination and exclusion of LGBTI persons and their families.
- [2]. What is the most relevant, in our opinion, is that the Government has not adopted the arguments of these amici, which shows how subjective and groundless they are. The Government cannot make these arguments in Court because they are, in substance, discriminatory, harsh and harmful, and explicitly contemptuous of the European conventions and system.
- [3]. In conclusion, we respectfully ask the Court to not take them into account.



Raluca Iustina IONESCU (ACCEPT Association)  
Lawyer on behalf of the applicants