

FILED**MAR 05 2021****Appeal No. 2018AP2205****CLERK OF SUPREME COURT
OF WISCONSIN**

**STATE OF WISCONSIN
IN SUPREME COURT**

IN THE INTEREST OF C. G., a person under the age of 18:

STATE OF WISCONSIN,

Petitioner-Respondent,

v.

C. G.,

Respondent-Appellant-Petitioner.

MOTION FOR LEAVE TO FILE NON-PARTY BRIEF

1. Pursuant to Wis. Stat. § 809.19(7)(a), Juvenile Law Center, National Center for Lesbian Rights, and Trans Law Help Wisconsin hereby move for an order granting them leave to file a non-party brief in this action as *Amici Curiae*.

2. Juvenile Law Center, National Center for Lesbian Rights (NCLR), and Trans Law Help Wisconsin join as *amici* because of their collective understanding of the harm that sex offender registration causes transgender youth. Each is committed to advancing the rights of children in the legal system. As national nonprofit legal organizations, Juvenile Law Center and NCLR work on a wide range of issues affecting youth in the juvenile justice system. They have

extensive experience advocating for youth in state and federal courts across the country. Trans Law Help Wisconsin, a state-based organization, provides individual legal services for transgender and nonbinary individuals across Wisconsin. Collectively, these organizations urge this Court to accept Respondent-Appellant-Petitioner's petition and confirm the unconstitutionality of sex offender registration as applied to a transgender teen.

3. **Juvenile Law Center** advocates for rights, dignity, equity and opportunity for youth in the child welfare and justice systems through litigation, appellate advocacy and submission of amicus briefs, policy reform, public education, training, consulting, and strategic communications. Founded in 1975, Juvenile Law Center is the first non-profit public interest law firm for children in the country. Juvenile Law Center strives to ensure that laws, policies, and practices affecting youth advance racial and economic equity and are rooted in research, consistent with children's unique developmental characteristics, and reflective of international human rights values.

4. The **National Center for Lesbian Rights (NCLR)** is a national nonprofit legal organization dedicated to protecting and advancing the civil rights of lesbian, gay, bisexual, transgender, and queer people and their families through litigation, public policy advocacy, and public education. Since its founding in 1977, NCLR has played a leading role in securing fair and equal treatment for LGBTQ people and their families in cases across the country involving constitutional and civil rights. NCLR has a long-standing and particular interest in safeguarding the

rights of transgender youth and LGBTQ youth in the juvenile justice system. NCLR litigates cases to protect the right to privacy for transgender youth and their ability to obtain corrected identity documents. NCLR has also developed model policies to address the needs of transgender youth in the juvenile justice system and provided training and support to agencies implementing transgender-inclusive policies and practices.

5. **Trans Law Help Wisconsin** is a pro bono legal project dedicated to providing legal information and resources to transgender and nonbinary individuals across the state of Wisconsin and beyond. One way Trans Law Help provides assistance is through hosting name and gender marker change clinics to assist individuals in the process of changing their name and/or gender markers on a variety of identity documents. Trans Law Help supports this petition because of its belief that every transgender individual should have the unalienable right to be legally recognized using their authentic name and gender marker. To not allow an individual to do so is to deny them dignity, respect, and the universal desire to feel comfortable in one's own skin.

6. This case questions the constitutionality of imposing a punishment of sex offender registration on an individual who was adjudicated delinquent in juvenile court for an offense committed when they were under age 18. *Amici* are well-positioned to aid this Court in the instant case by providing insights into the way the Appellant's youthfulness affects the constitutionality of her registration as a sex offender. The brief of *Amici* will analyze developmental

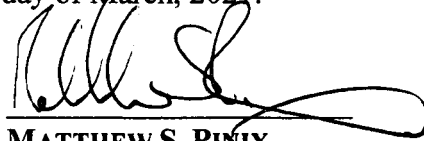
and empirical data on youth sexual offenses and the harm of registration on youth generally, and more specifically on transgender youth.

7. The Petition for Review was filed on February 19, 2021. Hence, this motion is timely filed pursuant to Wis. Stat. § 809.19(7)(b).

CONCLUSION

For the reasons stated above, Juvenile Law Center respectfully requests that the Court grant their motion for permission to file a non-party brief in this case, and that the Court accept the proposed non-party brief that accompanies this motion.

Respectfully submitted, this 5th day of March, 2021.



MATTHEW S. PINIX
Wisconsin Bar No. 1064368
PINIX LAW, LLC
1200 East Capitol Drive, Suite 360
Milwaukee, WI 53211
Phone: 414.963.6164
matthew@pinixlaw.com

CERTIFICATION

I certify that a copy of this motion has been filed with the Court and served on all parties on this 5th day of March 2021 as follows:

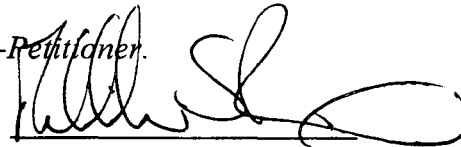
Gregory A. Parker
311 N. Main St.
Shawano, WI 54166-2145

Scott E. Rosenow
P.O. Box 7857
Madison, WI 53707-7857

Attorneys for Petitioner-Respondent

Cary E. Bloodworth
P.O. Box 7862
Madison, WI 53707-7862

Attorney for Respondent-Appellant-Petitioner.



MATTHEW S. PINIX
Wisconsin Bar No. 1064368
PINIX LAW, LLC
1200 East Capitol Drive, Suite 360
Milwaukee, WI 53211
Phone: 414.963.6164
matthew@pinixlaw.com