

FILED

JUL 12 2021

Appeal No. 2018AP2205CLERK 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 hereby respectfully requests leave to file a non-party brief in this action as *Amici Curiae* on behalf of itself and other interested organizations.

2. Juvenile Law Center, National Center for Lesbian Rights (NCLR), and other advocates seek to 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.

Collectively, these organizations urge this Court to declare sex offender registration unconstitutional as applied to a transgender teen, C.G.

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. 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.

6. Petitioner-respondent State of Wisconsin has filed their brief on June 30, 2021. Hence, this motion is timely filed pursuant to Wis. Stat. § 809.19(7)(c).

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.

Respectfully submitted, this 12th day of July, 2021.



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CERTIFICATION

I certify that this motion was delivered to the Clerk of the Supreme Court on this 12th day of July 2021. I further certify that this motion was served on all parties on this 12th day of July 2021 as follows:

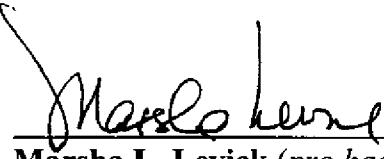
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