

FILED

JUL 12 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), Trans Law Help Wisconsin and Hawks Quindel, S.C., hereby respectfully request leave to file a non-party brief in this action as *Amici Curiae*.

2. Trans Law Help Wisconsin and Hawks Quindel, S.C. seek to join as *Amici* because of their collective understanding of the harm caused to those that are required to represent themselves using a name that does not authentically express their gender identity. Each is committed to advancing the rights of transgender individuals in the legal system. Collectively, these organizations urge this Court to declare sex offender registration unconstitutional as applied to a transgender teen, C.G.

3. **Trans Law Help Wisconsin** is a pro bono legal project dedicated to providing legal information and resources to transgender individuals across the state of Wisconsin and beyond. It is one of several legal projects sponsored by Community Justice, Inc. that provides free legal assistance to individuals. Trans Law Help Wisconsin does this, in large part, by hosting Name & Gender Marker Change clinics around the state, where individuals can attend to learn more about changing their name and gender marker on a variety of identity documents, such as their Wisconsin birth certificate, a Wisconsin driver's license, a U.S. passport, with Social Security, and more. The project also created and made available a Name and Gender Marker Change Guide that can be accessed at any time on its website. Trans Law Help Wisconsin was founded in 2016, and is the first legal project solely dedicated to advancing the legal rights of transgender individuals in the state of Wisconsin.

4. **Hawks Quindel, S.C.** is a law firm with offices in Madison, Milwaukee, Appleton, Eau Claire, and Kenosha that is dedicated to creating a more just world for people who have been injured or wronged. It has an extensive history of fighting for the rights of Wisconsin workers and labor unions, and at its core, the firm has always stood for social justice. It frequently partners with Trans Law Help Wisconsin on important legal issues impacting the transgender community in Wisconsin. While Hawks Quindel, S.C. can trace its roots in Wisconsin back more than six decades, its current form took shape in 2009.

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. The brief of *Amici* will analyze empirical data on the harm caused to transgender individuals who are forced to represent themselves under a name that does not authentically express their gender identity.

6. Petitioner-Respondent State of Wisconsin 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, Trans Law Help Wisconsin and Hawks Quindel, S.C. respectfully request 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 hand-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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