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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

DANE HADACHEK; NATHANIEL
HELLEWELL & LANDON MOODY,

Plaintiffs,

v.

THE STATE OF OREGON,

Defendant.

Case No. 25CV18224

ANSWER TO THIRD AMENDED COMPLAINT

ORS 20.140 - State fees deferred at filing

Defendant, the State of Oregon (“State”) responds to Plaintiffs’ Third Amended
Complaint (“Complaint”) as follows:

1.

Paragraph 1 contains Plaintiffs’ characterization of their lawsuit and therefore no
response is required.

2.

Paragraph 2 contains Plaintiffs’ characterization of their lawsuit and therefore no
response is required. The State denies that Plaintiffs are entitled to the relief they request.

3.

As to paragraph 3, sentence 1, the State admits that the case *In re Marriage of Boldt*, 344
Or. 1, 12, 176 P.3d 388, 394 (2008), states that: “We conclude that, although circumcision is an
invasive medical procedure that results in permanent physical alteration of a body part and has
attendant medical risks, the decision to have a male child circumcised for medical or religious
reasons is one that is commonly and historically made by parents in the United States.” As to
sentence 2, the State admits that ORS 163.207 and ORS 431A.600 were enacted in 1999. The

1 remaining allegations in sentence 2 are legal conclusions to which no response is required. Sentences 3
2 and 4 state legal conclusions to which no response is required. As to sentence 5, the State admits
3 that such legislation was proposed during the 2025 session of the Oregon Legislative Assembly
4 and that bill remained in committee upon adjournment, and denies the remaining allegations. As
5 to sentence 6, the State admits that male circumcision, a surgery to remove the skin that covers
6 the tip of the penis, also called the foreskin, is legal and that male circumcision is done for both
7 non-medical and medical reasons.

8 4.

9 In response to the allegations in paragraph 4, the document that is quoted is the best evidence
10 of its contents and speaks for itself.

11 5.

12 The allegations in paragraph 5, sentence 1 are so vague and nonspecific, as to the “beliefs”
13 of” and “agreement” between unnamed “international medical associations” and as to what policies
14 have been considered in or rejected by foreign jurisdictions, that they are impossible to admit or
15 deny. Consequently, the State lacks sufficient knowledge or information sufficient to form a belief
16 as to truth of the allegations in paragraph 2 and therefore denies.

17 6.

18 The allegations in paragraph 6, sentence 1, are vague and ambiguous as to the meaning of the
19 terms “sharp drop” and as to what geographic differences in circumcision rates occur the “western
20 United States,” such that the State lacks knowledge or information sufficient to form a belief as to
21 truth of the allegations. As to sentence 2, the State admits that male circumcision is legal in Oregon
22 and denies the remaining allegations.

23 7.

24 As to paragraph 7, sentence 1, the allegations are vague and ambiguous with respect to the
25 term “child genital cutting” and whether that term is intended to reference male circumcision or
26 female genital mutilation or both, and as to the varied experiences of individuals, and the State

1 therefore denies. The State lacks lacks sufficient knowledge or information sufficient to form a
2 belief as to truth of the allegations regarding Plaintiff Hellewell’s individual circumstances and
3 personal beliefs that comprise the remaining allegations in paragraph 7 and therefore denies.

4 8.

5 The State denies the allegations in paragraph 8.

6 9.

7 The State denies the allegations in paragraph 9, sentence 1. As to sentence 2, the State admits
8 that the quoted text appears in the referenced article.

9 10.

10 Paragraph 10, sentence 1 contains Plaintiffs’ characterization of their lawsuit and the
11 relief sought and therefore no response is required. The State denies that Plaintiffs are entitled to
12 any relief.

13 11.

14 Paragraph 11 contains Plaintiffs’ characterization of their lawsuit and therefore no
15 response is required. The State denies that Plaintiffs are entitled to the relief they request.

16 12.

17 The State admits the allegations at paragraph 12, sentence 1. The State lacks sufficient
18 knowledge or information sufficient to form a belief as to truth of the remaining allegations in
19 paragraph 12 regarding Plaintiff’s personal medical history and therefore denies. The State denies the
20 remaining allegations in paragraph 12.

21 13.

22 The State lacks knowledge or information sufficient to form a belief as to truth of the
23 allegations in paragraph 13, and therefore denies.

24 14.

25 The State lacks knowledge or information sufficient to form a belief as to truth of the
26 allegations in paragraph 14, and therefore denies.

1 15.

2 The State denies the allegations in paragraph 15.

3 16.

4 The State denies the allegations in paragraph 16.

5 17.

6 The State denies the allegations in paragraph 17.

7 18.

8 The State admits the allegations in paragraph 18, sentence 1. The State lacks knowledge or
9 information sufficient to form a belief as to truth of the remaining allegations in paragraph 18
10 regarding Plaintiff's personal medical history and therefore denies. The State denies the remaining
11 allegations in paragraph 18.

12 19.

13 The State lacks knowledge or information sufficient to form a belief as to truth of the
14 allegations in paragraph 19 and therefore denies.

15 20.

16 The State lacks knowledge or information sufficient to form a belief as to truth of the
17 allegations in paragraph 20 and therefore denies.

18 21.

19 The State denies the allegations in paragraph 21.

20 22.

21 The State admits the allegations in paragraph 22, sentence 1. The State lacks knowledge or
22 information sufficient to form a belief as to truth of the remaining allegations in paragraph 22
23 regarding Plaintiff's personal medical history and therefore denies. The State denies the remaining
24 allegations in paragraph 22.

25

26

1 23.

2 The State lacks knowledge or information sufficient to form a belief as to truth of the
3 allegations in paragraph 23.

4 24.

5 The State denies the allegations in paragraph 24.

6 25.

7 The State denies the allegations in paragraph 25.

8 26.

9 The State denies the allegations in paragraph 26.

10 27.

11 Paragraph 27 contains Plaintiffs' characterization of their lawsuit and therefore no
12 response is required.

13 28.

14 Paragraph 28, sentence 1 contains legal conclusions to which no response is required.
15 The State denies the allegations in sentence 2.

16 29.

17 The State admits that venue is proper.

18 30.

19 The State lacks knowledge or information sufficient to form a belief as to truth of the
20 allegations about Plaintiffs' personal medical histories in paragraph 30, sentence 1, and therefore
21 denies. The State denies the remaining allegations in paragraph 30.

22 31.

23 The State admits the allegations in paragraph 31.

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32.

As to the allegations in paragraph 32, the State admits that female genital mutilation can include but is not limited to the removal of parts of the vulva, including the clitoral hood or female foreskin and clitoral frenulum.

33.

The State lacks knowledge or information sufficient to form a belief as to truth of the allegations in paragraph 33 and therefore denies.

34.

The allegations at paragraph 34 are vague and lack specificity with respect to the term “genital cutting” and whether it references male circumcision or female genital mutilation and therefore the State denies.

35.

The allegations at paragraph 35 are vague and lack specificity with respect to the term “genital cutting” and whether it references male circumcision or female genital mutilation as well as to of the term “western medical association” and therefore the State denies. The State admits as to sentence 1 that female genital mutilation is a harmful practice that is illegal in the United States under federal law and in many states under their state laws, including Oregon.

36.

The allegations at paragraph 36, sentences 1 and 2 are vague and nonspecific as to “strong condemnation” and “internationally” as well as what “medical associations” have “concerns” that have allegedly been expressed. As to sentence 3, the State lacks knowledge or information sufficient to form a belief as to what “courts and legislatures” in foreign countries have or have not attempted to do with respect to male circumcision and therefore denies. The State admits the allegation in sentence

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37.

The State denies the allegations in paragraph 37, sentences 1, 2, and 3. As to sentence 4, the allegations regarding what forms of female genital mutilation are banned under Oregon law is a legal conclusion to which no response is required. As to sentence 4 and the table contained in paragraph 37, the website that is quoted is the best evidence of its contents and speaks for itself.

38.

As to the allegations in paragraph 38, sentence 1, the State admits that female circumcision includes but is not limited to the practice of removing the clitoral hood. The allegations regarding what is or is not illegal under federal law, Oregon law, or the law in other jurisdictions are legal conclusions to which no response is required. The remaining allegations in paragraph 38 are denied.

39.

The State lacks knowledge or information sufficient to form a belief as to truth of the allegations in paragraph 39.

40.

As to the allegations in paragraph 40, the State denies that male circumcision and female genital mutilation are similar or equivalent. The State lacks knowledge or information sufficient to form a belief as to truth of the remaining allegations in paragraph 40.

41.

The State lacks knowledge or information sufficient to form a belief as to truth of the allegations in paragraph 41.

42.

The State admits the allegations in paragraph 42.

43.

The State denies the allegations in paragraph 43, sentence 1. As to sentence 2, the referenced document is the best the best evidence of its contents and speaks for itself.

1 44.

2 The State denies the allegations in paragraph 44.

3 45.

4 The State denies the allegations in paragraph 45.

5 46.

6 In response to the allegations in paragraph 46, sentence 1, the State admits that ORS 163.207
7 and ORS 431A.600 were enacted in 1999. In response to sentence 2, the legislative history record that
8 is quoted is the best evidence of its contents and speaks for itself. The remaining allegations are legal
9 conclusions and Plaintiffs' personal opinions to which no response is required.

10 47.

11 The State denies the allegations in paragraph 47.

12 48.

13 In response to paragraph 48, the State incorporates its responses from all prior paragraphs.

14 49.

15 The allegations in paragraph 49 are legal conclusions to which no response is required.

16 50.

17 The allegations in paragraph 50 are legal conclusions to which no response is required.

18 51.

19 The allegations in paragraph 51 are legal conclusions to which no response is required.

20 52.

21 The allegations in paragraph 52 are primarily legal conclusions to which no response is
22 required. The remaining allegations in sentence 2 are denied.

23 53.

24 The allegations at paragraph 53, sentences 1, 2, and 3 are legal conclusions to which no
25 response is required. The State denies the allegations in sentence 4.

26

1 54.

2 The State denies the allegations in paragraph 54.

3 55.

4 The State denies the allegations in paragraph 55.

5 56.

6 The State denies the allegations in paragraph 56.

7 57.

8 The State denies that Petitioner is entitled to the relief sought in its prayer for relief.

9 58.

10 The State denies each and every allegation in the Petition, except as expressly admitted
11 above. To the extent that a response is required for any of the allegations to which State asserts no
12 response is required, it denies those allegations.

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1 WHEREFORE, having fully responded to the Complaint, the State requests the following
2 relief:

- 3 1. Dismissal of the Complaint with prejudice;
- 4 2. Judgment in the State's favor, together with an award of costs and expenses
5 incurred; and
- 6 3. Such other relief as the Court deems just and equitable.

7
8 DATED February 11, 2026.

9 Respectfully submitted,

10 DAN RAYFIELD
11 Attorney General

12 *s/ Sadie Forzley*

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26

1 **CERTIFICATE OF SERVICE**

2 I certify that on February 11, 2026, I served the foregoing ANSWER TO THIRD
3 AMENDED COMPLAINT upon the parties hereto by the method indicated below, and
4 addressed to the following:

5 Lake James H. Perriguey
6 Law Works LLC
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