

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

DECLARATION OF KATE E. MORROW IN
SUPPORT OF DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT

ORS 20.140 - State fees deferred at filing

I, Kate E. Morrow, declare:

1. I am an Assistant Attorney General with the Oregon Department of Justice. I am one of the attorneys assigned to represent Defendant in this case. I have personal knowledge of the matters set forth herein.

2. Attached to this declaration as **Exhibit 1** is a true and correct copy of transcript excerpts from the deposition of Plaintiff Dane Hadachek, taken on May 5, 2026.

3. Attached to this declaration as **Exhibit 2** is a true and correct copy of transcript excerpts from the deposition of Plaintiff Nathaniel Hellewell, taken on May 6, 2026.

4. Attached to this declaration as **Exhibit 3** is a true and correct copy of transcript excerpts from the deposition of Plaintiff Landon Moody, taken on April 28, 2026.

5. Attached to this declaration as **Exhibit 4** is a true and correct copy of the full text of the ballot titles that were put to the voters in Multnomah County for the general election on November 4, 2014. This document was downloaded from the Multnomah County Elections

1 Division website from the link to a PDF titled “Text of measures.” That website is:

2 <https://multco.us/info/november-4-2014-general-election>.

3 6. Attached to this declaration as **Exhibit 5** is a true and correct copy of the
4 Multnomah County 2014 General Election Voters’ Pamphlet. That document is available
5 through the Secretary of State’s online records search, <https://records.sos.state.or.us/ORSOSCM>
6 Search/Search/SearchMain.aspx.

7 7. Exhibits 4 and 5 are government documents that are proper subjects of judicial
8 notice under OEC 201(b).

9 **I hereby declare that the above statement is true to the best of my knowledge and**
10 **belief, and that I understand it is made for use as evidence in court and is subject to penalty**
11 **for perjury.**

12 DATED July 2, 2026.

13
14 s/ Kate Morrow
KATE E. MORROW

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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.	)	No. 25CV18224
	)	
THE STATE OF OREGON,	)	
	)	
Defendant.	)	

DEPOSITION OF DANE A. M. HADACHEK
Taken at the instance of Defendant

* * *

BE IT REMEMBERED THAT, pursuant to the Oregon Rules of Civil Procedure, the deposition of DANE A. M. HADACHEK was taken before Stephanie C. Rhinehart, an Oregon Certified Shorthand Reporter, Washington Certified Court Reporter, and Registered Professional Reporter, on Tuesday, May 5, 2026, commencing at the hour of 10:05 a.m., the proceedings being held from the Oregon Department of Justice, 100 Southwest Market Street, Portland, Oregon.

* * *

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Attorneys for Defendant

ALSO PRESENT:

DESSA GARRETT

* * *

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EXHIBIT INDEX

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Exhibit 2	Oregon Revised Statutes, Chapter 163 - 2025 Edition	21
Exhibit 3	Oregon Revised Statutes, Chapter 431A - 2025 Edition	21

(Attached hereto.)

* * *

1 P R O C E E D I N G S

2 THE REPORTER: Before I administer the oath,
3 will counsel please state their appearances.

4 ATTY MORROW: Kate Morrow, for the State.

5 ATTY FORZLEY: And Sadie Forzley, for the 10:05:39
6 State.

7 ATTY PERRIGUEY: Lake Perriguey, here with
8 Dane Hadachek, for the plaintiff.

9
10 DANE A. M. HADACHEK,
11 Having first been sworn by the Certified Shorthand Reporter
12 to tell the truth, testified under oath as follows:

13
14 EXAMINATION

15 BY ATTY MORROW:

16 Q All right. So I am Kate, and this is Sadie, and we
17 represent the State in this lawsuit. And so to give
18 you a sense of what our plan is for today, we're going
19 to set some ground rules at the outset, and then we're
20 going to have some questions for you generally about 10:06:22
21 yourself, and then we'll have questions about this
22 lawsuit specifically.

23 A Okay.

24 Q So first, we're on the record, which means that we
25 don't want to interrupt each other. So do we agree 10:06:32

1 Q Can you tell us more about that. 10:18:55

2 A Talking with my mom about it -- but it was -- but we
3 came to a conclusion that it probably wouldn't be worth
4 it in the long run.

5 Q Can you tell us a little more about why you decided it 10:19:09
6 wasn't worth it.

7 A Because when it comes down to -- it's more of an
8 education of something than something that's taught.
9 And, most likely, the people aren't doing it -- aren't
10 completely aware. And it was -- it's undereducated 10:19:24
11 completely. It's just a process that's taught.

12 Q And --

13 A Therefore, it's nothing particularly -- I would say
14 it's nothing particularly against the doctor who did
15 it; it's just that -- something that they are taught as 10:19:41
16 a doctor or a nurse.

17 Q And did you ever seek medical attention regarding your
18 circumcision?

19 A Yes.

20 Q Can you tell us more about that. 10:19:54

21 A I've had multiple infections after I was born going
22 through it and -- having to go back and forth between
23 the doctors and stuff, seeking help.

24 Q And how did you become a plaintiff in this case?

25 A Through my boss. 10:20:15

1 Q Can you tell us more about that. 10:20:17

2 A Yeah. Can't remember how my parent -- how my parents
3 met him, but he ended up telling my mom and stuff --
4 met with the next-door neighbor -- up -- and ended up
5 just talking stuff. My mom talked to me about it and 10:20:35
6 asked me if I wanted to be a part of it. And then I
7 kind of joined to be a part of it.

8 Q Did you --

9 A Because I agree with it morally.

10 Q Okay. And in your own words, what does "stigma" mean 10:20:49
11 to you?

12 A Can't remember the vocabulary word of what it means.

13 Q Okay. So let's look back at Exhibit 1. And if you
14 turn to paragraph 15...

15 ATTY FORZLEY: Could we take a break? Just a 10:21:31
16 very short one.

17 (Break in proceedings at 10:21 a.m.)

18 BY ATTY MORROW:

19 Q So can you tell us why a prohibition on subjecting
20 girls to female genital mutilation causes you to feel 10:22:21
21 humiliated?

22 A Can you elaborate on that and dumb it down.

23 Q Earlier we talked about female genital mutilation --

24 A Mm-hmm.

25 Q -- and how there's a prohibition on it in Oregon. And 10:22:34

1 why does that prohibition cause you to feel humiliated? 10:22:38

2 A Because it's not normalized for all children as a
3 protection, and therefore it feels almost normalized
4 for one group. And then, compared to males, it is, you
5 know, not the same and -- yeah. 10:23:01

6 Q And how have you experienced that feeling in your
7 everyday life?

8 A Between -- well, there's different aspects. Between,
9 like, jokes and stuff being normalized -- between,
10 like, friends and stuff like that, it makes it feel 10:23:25
11 more humiliating. But also, when it comes down to
12 personal relationships and stuff like that, it hinders
13 at certain points.

14 Q You mentioned jokes between friends. Can you say more
15 about that. 10:23:43

16 A Yeah. It's not nearly as normalized and -- like,
17 generally, especially to talk about it. But just being
18 circumcised, like, generally -- and all the above --
19 it's almost embarrassing to a point. And, like, when
20 it's even talked about in a, like, a private setting, I 10:24:13
21 still end up finding my way of getting jokes and, you
22 know, stuff from friends, and it makes it feel even
23 worse. And it makes me kind of realize how, like,
24 there's no normalized safe point between any of it.

25 Q Can you help me understand that a little bit more. I'm 10:24:41

1 not sure I'm following. 10:24:45

2 A I don't even know how to...

3 Q That's okay.

4 Can you tell us about a specific time when you
5 felt humiliated? 10:25:00

6 A Yeah. One of my old best friends -- I tried talking to
7 him about it, trying to make casual conversation. And,
8 like, later -- like, later and stuff while hanging out
9 or doing anything, you know, hanging out with him, it
10 would almost make it seem -- he would almost make it 10:25:25
11 seem like it was a point to say some sort of, you know,
12 like, joke about it and stuff. And so I would sit
13 there and kind of awkwardly laugh it off like it was --
14 but it kind of generally hurts.

15 Q You've said "it" a lot. Can you explain what you mean. 10:25:44

16 A There's different forms of what I meant it as --
17 between it being a subject matter for circumcision or
18 just a general, like, replacement word. Yeah.

19 Q Okay. Can you tell us about a time that you were
20 humiliated in public for being circumcised? 10:26:22

21 A Yeah. My best friend, Dalton, me and him work
22 together. And we work on a crew on the for- -- you
23 have, like, four to five people. And me and him will
24 have, like, friendly banter going back and forth.
25 Like, throwing crap at each other. Pretty normal. 10:26:50

1 And then he'll mention something, saying, "Well, 10:26:54
2 at least I'm not circumcised," or something more harsh
3 along the lines. And it kind of just -- it hurts my
4 ego and hurts my feelings generally. And it's -- yeah.
5 Q And do your parents treat you any differently because 10:27:13
6 you're circumcised?
7 A No.
8 Q When did you first feel humiliated by being
9 circumcised?
10 A I would think -- I was 16. It was the first time that 10:27:34
11 I tried having sex. And, like, the first few times, it
12 didn't work whatsoever. I didn't have enough sensation
13 to be able to even go any further. And it made me feel
14 humiliated and hurt my ego and generally hurt me. And
15 brought me down. 10:28:00
16 Q And have you ever been -- sorry. Scratch that.
17 To clarify, that is referring to a private
18 interaction between and you another individual?
19 A Yes.
20 Q Have you ever been harassed or threatened because you 10:28:29
21 were circumcised?
22 A No.
23 Q And has it ever affected your work?
24 A Like, my job?
25 Q Mm-hmm. 10:28:45

1 A Yeah. 10:28:49

2 Q Can you tell us more about that.

3 A Between both of -- my old job and my new job, never
4 really found a way to escape the jokes or banter or
5 anything. And it brought my mood down, and I would end 10:29:06
6 up leaving work. I've left work early a few times
7 and -- or just, like, sat there and would think about
8 it for a little bit and, like, wouldn't get nearly as
9 much done; so --

10 (Reporter requests clarification.) 10:29:36

11 THE WITNESS: I would sit there and think
12 about it for a little bit and kind of daydream, and it
13 would hinder the amount of work I'm doing.

14 ATTY MORROW: Okay. Let's take a quick
15 break. 10:29:53

16 (Break in proceedings at 10:29 a.m.)

17 BY ATTY MORROW:

18 Q All right. Are you familiar with the two statutes, the
19 two laws that you are challenging in this lawsuit?

20 A Yes. 10:36:07

21 Q In your own words, what is your understanding of those
22 laws?

23 A Can you remind me of what the laws are specifically.
24 Because I know that I have a response.

25 Q Absolutely. 10:36:24

1 Q And what is your understanding of that law? 10:39:32

2 A That it is also one law specifically for one gender and
3 not all around.

4 Q And what are you hoping to achieve in this lawsuit?

5 A For general protection all around for newborns, 10:39:49
6 infants, kids, and anyone under the age of 18 when it
7 comes to circumcision.

8 Q And what are you asking the Court to do to achieve that
9 goal?

10 A To either -- to bring more general -- more protection 10:40:14
11 towards all children instead of one gender. And to end
12 or make it more educated -- some sort of remedy.

13 Q All right. So you have the laws in front of you. And
14 I'm going to summarize those laws and say that one of
15 them makes it a crime to subject someone to female 10:40:48
16 genital mutilation.

17 And can you tell me how you have been harmed by
18 the law that makes it a crime to commit female genital
19 mutilation.

20 A Because it's not protected for all -- it's only for 10:41:03
21 one side. And, therefore, when it comes to the male
22 side, it not being a law -- protected or anything like
23 that -- it's a double standard completely. And there's
24 aspects that go into it.

25 Q And the other law, 431A.600, requires certain education 10:41:29

1 and outreach activities to communities that 10:41:38
2 traditionally practice female genital mutilation.

3 Can you help us understand how you have been
4 harmed by that law.

5 A Can you reword that. 10:41:48

6 Q Sure.

7 The other law, the education law, requires certain
8 education and outreach to -- about FG -- about female
9 genital mutilation.

10 A Mm-hmm. 10:42:00

11 Q And how have you been harmed by that law?

12 A Because it doesn't protect everyone. It's only
13 one side.

14 Q Okay. Can you elaborate -- so you said that it doesn't
15 protect everyone, it protects one side. Can you 10:42:18
16 elaborate with a specific example of how that has
17 affected you.

18 A Same thing as I said last time, yeah. The comparison
19 and how hypocritical it is for one gender compared to
20 the other when they're both equal. 10:42:53

21 Q And in your day-to-day life -- you know, going to work,
22 hanging out with friends -- how have those harms shown
23 up for you?

24 A Can you elaborate.

25 Q Yeah. How do you experience the harm that you just 10:43:15

1 described in your day-to-day life? 10:43:21

2 A I don't know how to word it, to be honest.

3 Q Can you try?

4 A No.

5 Q Do you think that -- so you've asked the Court -- 10:44:02
6 sorry. Let me start again.

7 You've asked the Court to strike down these
8 statutes. And can you -- are these laws -- will
9 striking down these laws change the harms that you
10 feel? 10:44:22

11 A Yes.

12 Q Why?

13 A Because knowing that it's -- there's some sort of
14 change that makes it equal for all -- everyone -- I
15 feel like that's kind of the remedy. It normalizes it 10:44:39
16 for me as a person, and it also -- it normalizes it
17 more and also kind of just generally makes me feel
18 better that I'm doing something about it.

19 Q And you've also asked the Court to extend the law to
20 not only prohibit female genital mutilation but to also 10:45:15
21 prohibit male circumcision. If the Court does that,
22 how will that affect you?

23 A The same as what I just said.

24 Q Will it fix any of your injuries?

25 A Not directly. 10:45:43

1 Q And will it affect your day-to-day life? 10:45:51

2 A Yes.

3 Q Can you tell us why.

4 A Because it normalizes it generally. And, also, it
5 brings me up generally as a person and allows me to 10:46:02

6 kind of live with -- I did something -- even though I
7 went through something, I did something that's morally

8 and ethically positive and normalizes it and makes me
9 feel better as a person. And I feel like I can live

10 with that -- it is -- it outweighs what I've been 10:46:26
11 through as a person.

12 Q All right. Let's -- I think we're pretty close to
13 done. Let's take a quick break and then wrap up.

14 A All right.

15 (Break in proceedings at 10:47 a.m.) 10:46:55

16 ATTY MORROW: That is all the questions we
17 have.

18 Do you have anything?

19 ATTY PERRIGUEY: I don't have anything, no.

20 ATTY MORROW: Okay. Then we're done. 10:48:48

21 ATTY PERRIGUEY: Great. Thank you.

22 (Deposition adjourned at 10:48 a.m.)

23 (Reading and signing was requested.)

24 * * *

25

1 CERTIFICATE OF SHORTHAND REPORTER

2 STATE OF OREGON)
3) ss.
4 COUNTY OF MULTNOMAH)

5 This is to certify that I, Stephanie C. Rhinehart,
6 a Washington Certified Court Reporter, Oregon Certified
7 Shorthand Reporter, and Registered Professional Reporter
8 reported the within and foregoing deposition; said
deposition being taken before me on the date herein set
forth; that the witness was duly sworn by me and that I was
authorized to and did report said proceedings.

9 I further certify that the foregoing transcript is
10 a full, true, and correct record of the proceedings to the
11 best of my ability; that said proceedings were taken by me
12 stenographically and thereafter reduced to typewriting under
13 my supervision; and that I am neither counsel for, related
to, nor employed by any of the parties to this case and have
no interest, financial or otherwise, in its outcome.

14 I further certify that reading and signing was
15 requested.

16 IN WITNESS WHEREOF, I have hereunto set my hand
17 this 19th day of May, 2026.

18 

19 /s/Stephanie C. Rhinehart, RPR
20 Washington CCR No. 22013531
21 Expires 05/26/2027
22 Oregon CSR No. 22-0014
23 Expires 09/30/2028
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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.	)	No. 25CV18224
	)	
THE STATE OF OREGON,	)	
	)	
Defendant.	)	

DEPOSITION OF NATHANIEL A. HELLEWELL

Taken at the instance of Defendant

* * *

BE IT REMEMBERED THAT, pursuant to the Oregon Rules of Civil Procedure, the deposition of NATHANIEL A. HELLEWELL was taken before Stephanie C. Rhinehart, an Oregon Certified Shorthand Reporter, Washington Certified Court Reporter, and Registered Professional Reporter, on Wednesday, May 6, 2026, commencing at the hour of 10:06 a.m., the witness responding to questions by videoconference from Richmond, Kentucky; the questions being propounded and proceedings reported by videoconference from Portland, Oregon.

* * *

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17
18 * * *

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* * *

EXHIBIT INDEX

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Exhibit 3	Oregon Revised Statutes, Chapter 431A - 2025 Edition	37

(Attached hereto.)

* * *

1 P R O C E E D I N G S

2 THE REPORTER: Before I administer the
3 oath, will counsel please state appearances.

4 ATTY MORROW: Kate Morrow, for the State.

5 ATTY SCOTT: Carla Scott, for the State.

10:06:03

6 ATTY CLOPPER: Eric Clopper, for the
7 deponent.

8 ATTY PERRIGUEY: Lake Perrigüey, local
9 counsel for the deponent and plaintiff.

10 (Witness duly sworn.)

10:06:14

11 ATTY MORROW: All right. Thank you,
12 Stephanie.

13
14 NATHANIEL A. HELLEWELL,
15 Having first been sworn by the Certified Shorthand
16 Reporter to tell the truth, testified under oath as
17 follows:

18
19 EXAMINATION

20 BY ATTY MORROW:

10:06:35

21 Q Nathaniel, I am Kate, and I'm going to be
22 conducting this deposition today. And I'm joined by
23 Carla, who just introduced herself. Just to give you a
24 sense of what's going to happen today, we're going to set
25 out some ground rules and then ask some general questions

10:06:50

1 your ability, Nate. 10:10:14

2 THE WITNESS: I don't believe so.

3 Q BY ATTY MORROW: And just to confirm what we
4 discussed earlier, is there anyone else in the room with
5 you? 10:10:24

6 A No, there is not.

7 Q Okay. And can we agree to put your phone out
8 of reach and not use it during the deposition except to
9 talk to your attorney? Thank you.

10 All right. Do you have any prior names that 10:10:42
11 you've used or other names that you go by?

12 A No.

13 Q When were you born?

14 A June 21st, 2006.

15 Q And where were you born? 10:10:52

16 A In Portland, Oregon.

17 Q How old are you?

18 A I'm 19 years of age.

19 Q Where did you grow up?

20 A I grew up in -- mostly in Federal Way, 10:11:03
21 Washington.

22 Q And do you have any siblings?

23 A I do not.

24 Q Where did you live now?

25 A I live in Richmond, Kentucky. 10:11:18

1 Q And when did you move from Washington to 10:11:21
2 Kentucky?

3 A About two and a half years ago, I believe.

4 Q For what purpose did you move?

5 A My parents wanted to move. And I was underage 10:11:36
6 at the time; so I went with them.

7 Q And when did you move to Washington?

8 A We lived in Washington when I was born. We
9 drove down to Oregon because we lived in very southern
10 Vancouver, Washington. And we drove down to the hospital 10:12:00
11 in Oregon. I believe it's -- I think we were in the
12 process of moving. I can clarify that. If needed I can,
13 like, ask my mother. I'm not entirely certain, but I
14 know that we were in between moving and things were
15 happening. 10:12:22

16 Q Okay.

17 A Not entirely certain on that but...

18 Q It sounds like -- is it correct to say that you
19 lived in Washington for around the time when you were
20 born until you moved to Kentucky a few years ago? 10:12:31

21 A Yes.

22 Q Okay.

23 Have you voted in an election?

24 A I have.

25 Q Where did you vote in the last election? 10:12:39

1 ATTY MORROW: And, Stephanie, am I good to 10:18:59
2 proceed? Or do you need a minute?

3 THE REPORTER: Yes, thank you. Just a
4 couple seconds so I can mark it. Thank you.

5 Q BY ATTY MORROW: And, Nate, do you have the 10:19:09
6 complaint in front of you?

7 A I can get it in front of me here.

8 Q Do you have printed copies?

9 A I do not have a printed copy. I do not have a
10 printer. I'm sorry. 10:19:23

11 Q Okay. I can just screen-share it, then.

12 A Okay.

13 Q Nate, can you see my screen?

14 A I can indeed.

15 Q Excellent. So I'm going to scroll to the top 10:19:50
16 of this document. It is marked as being filed on the
17 14th of January. It is the complaint that was filed on
18 your behalf in this lawsuit. Does that look familiar?

19 A Yes.

20 Q Great. So you said you have seen this document 10:20:01
21 before; is that correct?

22 A I have.

23 Q And what is your understanding of this
24 document?

25 A That this is the complaint that I'm a part of. 10:20:13

1 That is -- we're just trying to seek equal protection for 10:20:28
2 female and male children.

3 Q Okay. Did you read this document before it was
4 filed with the Court?

5 A I'm not sure. I don't remember if it was -- it 10:20:40
6 would be -- whether or not it was sent to me before it
7 was filed. I -- if I had to make an assumption, I would
8 assume that I probably read it after it was filed. I
9 think that's when it was sent to me, but I'm not certain.

10 Q And are you familiar with the allegations and 10:21:01
11 claims in this document?

12 A Yes. I believe so.

13 Q All right.

14 ATTY PERRIGUEY: This is Lake Perrigüey.
15 I just want to remind the witness not to guess or make 10:21:14
16 assumptions. Just answer the questions that you know.

17 THE WITNESS: Okay.

18 Q BY ATTY MORROW: And so I'm going to put this
19 document aside for now. And I'm going to stop my
20 screen-share, but we might come back to it in a little 10:21:29
21 bit.

22 So I would like to start talking a little bit
23 by defining some terms that we'll be using today. Are
24 you familiar with the terms "genital mutilation" and
25 "cutting"? 10:21:45

1 A I think it's abhorrently evil. I don't think 10:26:02
2 that anybody should ever have to be subjected to it. And
3 I can't believe that somebody would want to do that to
4 another person.

5 Q And do you think that female genital mutilation 10:26:15
6 should be a crime in Oregon?

7 A I do.

8 Q Have you contacted any of your elected
9 officials about repealing laws about female genital
10 mutilation or proposing -- yeah. Sorry. I'll leave that 10:26:32
11 there.

12 A I have not. I have not, no. I have not
13 contacted any of my local elected officials.

14 Q And have you contacted any elected officials
15 about prohibiting male circumcision? 10:26:46

16 A I have not.

17 Q Why not?

18 A I have had a lot of things going on. And it's
19 something that I've thought about doing, but between -- I
20 was homeless a couple times and moving -- there was quite 10:27:08
21 a few -- I suppose my life's been busy, and it was never
22 enough of a priority for me to do it. But it is a cause
23 that is important to me.

24 Q And have you engaged in any other activism or
25 advocacy against male circumcision other than this 10:27:30

1 lawsuit? 10:27:33

2 A I have. I've talked to a lot of people, just
3 on a person-to-person level. Interacted a lot online as
4 well but...

5 Q When you say you've "interacted a lot online," 10:27:49
6 what do you mean?

7 A Online communities between -- just other people
8 that I've met online or in communities of parents asking
9 for information.

10 Q Okay. What about any social media posts or 10:28:04
11 social media campaigns?

12 A I don't really do social media; so I don't have
13 any of that.

14 Q And have you attended any in-person events?

15 A I have not, no. 10:28:17

16 Q All right. And have you engaged in any
17 activism or advocacy around female genital mutilation?

18 A I have as well in the same place online. I've
19 talked to people about it. I've generally probably
20 mentioned it relating to male circumcision -- how, you 10:28:33
21 know, it's -- they're both awful, but we're making
22 progress and we should continue making progress. And,
23 you know...

24 Q Great. So we're going to talk about your
25 circumcision now for a little bit. 10:28:53

1 has happened to me, maybe it was something that God 10:30:24
2 wanted.

3 He told me, according to their church, that
4 there was nothing requiring that, that that didn't need
5 to happen and it was probably better that their church 10:30:34
6 advised not to.

7 And, like, that's pretty cool. So it wasn't
8 our church. It wasn't their religion. It wasn't
9 anything. It just happened, and it was bad. But that
10 was my opinion on it at the time and remains my opinion 10:30:46
11 still. Unhappy.

12 Q And in the first part of that answer, you
13 mentioned that it looked -- it was off. Can you tell us
14 what "it" was?

15 A Just the way that my -- the circumcision, like, 10:30:58
16 looked. It's not straight. It's not even. It's
17 uncomfortable. It hurts. It itches. It doesn't look
18 right. It's...

19 Q And how did you learn that you were
20 circumcised? 10:31:14

21 A When I researched what was happening with my
22 dick.

23 Q And did anything go wrong during your
24 circumcision?

25 A I believe so. I've tried to get as much 10:31:28

1 information from my parents on this as I can. So I'll 10:31:32
2 give you the most accurate understanding of what
3 happened.

4 I believe that I was initially circumcised.
5 They made a mistake in my circumcision, and something 10:31:41
6 went rather wrong, and the hospital was trying to say
7 that there wasn't anything wrong. So then my father
8 specifically wanted them to revise something or change
9 something; so the hospital tried again. I went home. I
10 got an infection. I went back to the hospital. They did 10:32:02
11 something else, and then I went home. And I'm not
12 certain about things happening after that but...

13 Q And have you had to seek medical attention for
14 any complications after those initial medical visits you
15 just described? 10:32:24

16 A I have repeatedly, actually. So because of the
17 revisions and the original mistake, all of -- the skin
18 that would normally be a part of my scrotum is now pulled
19 up, and so there's no room for my testicles to sit
20 correctly. So when I move around or sit in position such 10:32:47
21 as sitting in a car or a chair for an extended period of
22 time, I get testicular torsions repeatedly, which are
23 extremely painful and are caused by not having enough
24 physical space to right themselves when they get moved.

25 So I've probably had about eight of them. And 10:33:07

1 sometimes I can -- in the last year, sometimes I can fix 10:33:10
2 them myself, but sometimes I have to go to the emergency
3 room, which is expensive and annoying and painful.

4 Q Did you ever think about taking legal action
5 against the doctor who circumcised you? 10:33:24

6 A Oh, I definitely -- I've definitely thought
7 about it. I don't have a -- any intention to at the
8 current -- I've thought about it, though. I mean, I've
9 been angry; so I've thought about a lot of things. But I
10 don't know if it's the most correct thing to do. I don't 10:33:44
11 think it would be necessarily, probably, fair but...

12 Q And how did you become a plaintiff in this
13 case?

14 A Became a plaintiff in this case because I was a
15 part -- so I was interested in trying to fix what went 10:34:05
16 wrong. So I was looking online. I found a project
17 called Foregen, which is -- they're trying to medically
18 reproduce foreskins and reimplant them on people. And
19 through that, I found the charity that Eric's law firm
20 works with. 10:34:30

21 And then I saw that they were seeking
22 plaintiffs for their lawsuit. And it said, hey, people
23 who were born here between these dates and are interested
24 in this -- and I was like, "Hey, I'm born between this --
25 that's -- Hey, look at that." So I applied, and then I'm 10:34:45

1 here. 10:34:50

2 Q Okay. In your own words, what does "stigma"
3 mean to you?

4 A A stigma is -- it's like a social prejudice
5 against something or a different treatment of two 10:35:11
6 different classes or groups socially.

7 Q And how did you learn about stigma as you just
8 described it?

9 A I would say, in some part, from talking to my
10 lawyers the other day, where we talked about -- 10:35:34

11 ATTY PERRIGUEY: Hey. Hey. Hey.
12 Objection.

13 Don't talk to her about communications
14 you've had with me or with Eric. Okay?

15 THE WITNESS: Okay. 10:35:43

16 ATTY CLOPPER: Yeah.

17 ATTY PERRIGUEY: And so -- so there we go.
18 That's all.

19 THE WITNESS: Well, I'm not sure exactly
20 how I was supposed to answer that. Do I -- because I -- 10:35:53

21 ATTY CLOPPER: Yeah. So, Kate, could you
22 repeat the question.

23 ATTY MORROW: Yeah.

24 Q BY ATTY MORROW: How did you learn about stigma
25 and what stigma is? 10:36:12

1 A You said specifically as -- like, as you said 10:36:15
2 it there or something to those terms. So --

3 Q Yeah.

4 A -- as you described it there.

5 Q Yeah. You described stigma as involving a 10:36:25
6 social prejudice, and I wanted to know how you learned
7 about stigma as a -- being a social prejudice.

8 A Well, I originally would say that you would
9 think of a stigma as -- like, there's a stigma around,
10 like, STDs or having HIV or something. There's, like, a 10:36:49
11 social, like, (vocalizes). Like, there's a stigma around
12 if you're someone that has that. That's a...

13 Q And when did you first learn about stigma?

14 A I'm not certain. I don't know. Probably in
15 school at some point. 10:37:08

16 Q And what is the stigma that you experience?

17 ATTY CLOPPER: I'm going to object as
18 vague and ambiguous.

19 But you can answer the question to the best
20 of your ability, Nate. 10:37:26

21 THE WITNESS: Could you repeat the
22 question.

23 Q BY ATTY MORROW: Sure. I'll rephrase.

24 Do you experience a stigma?

25 A I believe I do. I believe that, just because 10:37:34

1 of my sex, I was protected differently than other 10:37:39
2 children who were born at the same time, in the same
3 place, in the same circumstances as me. And that that
4 is -- that is un- -- that is unfair and unjust treatment.

5 And I've also suffered from social stigmas as a 10:38:01
6 part of having -- having been circumcised and having had
7 what happened to me happen to me. Because there have
8 been multiple times where people have suddenly become
9 uninterested in pursuing dating or other, like, similar
10 social interactions when they learn that I was 10:38:32
11 circumcised. And that definitely felt like a stigma.
12 That definitely felt like something that -- I wasn't
13 wanted, you know? So...

14 Q Yeah. And how does that stigma affect your
15 daily life? 10:38:57

16 A Well, the stigma that got me here in the first
17 place affects me every day. The stigma where, you know,
18 I wasn't protected as I should have been is the reason
19 why I'm here and the reason why I'm in pain regularly and
20 the reason why I keep having to go to the doctor and 10:39:15
21 everything else that's painful and not -- not good.

22 And the second half of the stigma -- well, I
23 mean, currently, it doesn't really affect me too much
24 because I'm in a relationship where I'm not pursuing
25 anybody; so there's not really a reason for me to discuss 10:39:34

1 that with anyone. But... 10:39:36

2 Q And when you say the "second half" of -- excuse
3 me. Go ahead and finish.

4 A Oh, continue. Continue.

5 Q When you say the "second half" of the stigma, 10:39:45
6 what do you mean by that?

7 A I meant that -- I stated two examples. I
8 stated, at birth, I was not protected the same. And I
9 also said that, as an adult, I am not treated the same.
10 So I was originally referring to -- as a child, I was not 10:40:01
11 treated the same, and that is why I'm circumcised. And
12 as an adult, I am not treated same. And that previously
13 had a massive effect on me. It does not as much anymore
14 because I'm in a committed relationship, but it did a lot
15 previously. 10:40:26

16 Q And can you tell us about a specific time that
17 you were humiliated for being circumcised?

18 A I wouldn't say I was humiliated as much as just
19 very upset, but there have been multiple times where I
20 have been having sex with somebody and I'm unable to 10:40:51
21 actually get anywhere or participate, really. And it's
22 because I can't feel anything. And so that really is
23 humiliating and upsetting when you're sitting there and
24 you're just -- can't do anything.

25 Q And have you ever been publicly humiliated for 10:41:16

1 being circumcised? 10:41:19

2 A Not necessarily publicly, no.

3 ATTY MORROW: All right. Let's take a
4 break for a few minutes. Is that okay?

5 ATTY CLOPPER: Sure. 10:41:35

6 (Break in proceedings at 10:41 a.m.)

7 BY ATTY MORROW:

8 Q All right. Nate, I'm going to go back to a few
9 things that we talked about earlier.

10 You mentioned that you've experienced 10:50:51
11 testicular torsion. Has a doctor ever told you that that
12 was caused by your circumcision?

13 A The urologist in the emergency room that I went
14 to the first time that it happened told me that that was
15 what he believed had caused it. 10:51:07

16 Q And where was that emergency room?

17 A University of Kentucky Hospital,
18 Downtown Lexington, Kentucky.

19 Q And so that would have been in the last couple
20 of years? 10:51:24

21 A Yes.

22 Q And do you happen to have a copy of your birth
23 certificate with you?

24 A Like, that I could get right now?

25 Q Yes. 10:51:31

1 A Via email? Probably. I couldn't say for 10:52:45
2 certain. I don't often email people.

3 Q What about by -- go ahead and finish.

4 A No. That's all I was going to say.

5 Q Oh, what about by text? 10:52:59

6 A By text? Almost certainly, yes.

7 Q And you have talked a little bit about the
8 physical harms that you've experienced from your
9 circumcision.

10 Are you taking any medications that address 10:53:22
11 those harms?

12 A I'm not sure if I'm taking any to address
13 directly and specifically only those harms, but I
14 definitely discussed those harms with my therapist as we
15 determined what we wanted to do, and that was a 10:53:54
16 significant part of the conversation.

17 Q And do you do any, like, journaling?

18 A Not generally. I like talking out loud.

19 Q Okay. And you mentioned text. Who would you
20 have sent texts with about your circumcision? 10:54:17

21 A About my circumcision specifically? Probably
22 my mother and father, at some point. Friends. I want to
23 say that the most messages would have been sent through
24 digital messengers -- like Discord, Telegram, Signal --
25 with friends -- would be probably the most. 10:54:41

1 Q Any -- do you know the names of the friends 10:54:52
2 that you would have communicated with on those platforms?

3 A I mean, do you want me to start a list? I
4 talked to a lot of people. This has been an issue I've
5 been very interested in and passionate about for a while. 10:55:09
6 So I've talked to a lot of people, and I'm not
7 entirely -- I don't have a list of every person I've ever
8 told. Like, it's an issue I discuss regularly with
9 people.

10 Q And maybe just, like, the main people that you 10:55:29
11 talked to about it.

12 A I mean, like, main people would be probably my
13 parents, my ex-boyfriend, and my current boyfriend. I
14 also have a friend who's in biotech, and I've talked to
15 him a lot about it because he's interested in... 10:55:45

16 Q Can you tell me the names of those five people
17 you just mentioned?

18 A Laurie Hellewell and Kenneth Hellewell are my
19 parents. And then my boyf- -- my ex-boyfriend would be
20 Jason Welch. My current boyfriend -- well, his ex-fiancÃ© 10:56:13
21 actually, but anyhow -- current boyfriend would be
22 Jake Keblusek.

23 Q Could you spell that --

24 A Yes.

25 Q -- for the record. 10:56:28

1 Q And earlier we talked about female genital 10:58:01
2 mutilation. Why does a law prohibiting female genital
3 mutilation make you feel humiliated?

4 A Because it only protects females and it doesn't
5 protect males. There's a federal law that prevents 10:58:17
6 female genital mutilation already; so removing this law
7 wouldn't -- wouldn't cause any people to be harmed. But
8 this law is -- it's unfair. It only protects people of
9 one sex and not people of both sexes. And having
10 equality is very important. 10:58:42

11 Q And how have you experienced that feeling or
12 that stigma in your day-to-day life?

13 A Didn't I already answer this earlier? I
14 think...

15 Q Just in reference to what you just said about 10:58:58
16 the law being -- I think you said "unfair."

17 A Well, it affects my daily life because I am
18 circumcised because of that. The law only -- the law
19 only protects women from genital mutilation, not men from
20 genital mutilation. And so I was born, my genitals were 10:59:24
21 mutilated, and now I'm here.

22 And so I was not protected by a law that should
23 have fairly protected me.

24 Q And why does the law that requires education
25 and outreach to certain communities about female genital 10:59:41

1 mutilation make you feel humiliated? 10:59:47

2 A Because it needs to do that for both genders.
3 I'm all for outreach and education and everybody learning
4 more about themselves and other people and how
5 everybody's genitals work and how we can all be the best, 10:59:59
6 healthiest people. But I think that the law should exist
7 and be fair to both genders, all genders, to educate
8 people on both sides, you know. It shouldn't only
9 protect women and not men.

10 Q And have you ever been denied or prohibited 11:00:26
11 from doing something because you have been circumcised?

12 A I've been denied by people. I don't think I've
13 been prohibited -- well, I mean -- well, do you mean
14 prohibited, like, by somebody? Or just unable to do
15 something because of it? 11:00:47

16 Q Prohibited by somebody from doing something.

17 A Well, I've had people who were previously
18 interested in me turn me down sexually because they found
19 out that I was circumcised and they were no longer
20 interested. That would be somebody turning me down. 11:01:04

21 Q And have you ever been denied access to a
22 business because you've been circumcised?

23 A No.

24 Q What about a job?

25 A No. 11:01:13

1 Q Great. And, again, in your own words, 11:04:15
2 independent of what your lawyers have told you, what is
3 your understanding of this law?

4 A It's the State of Oregon doing an outreach 11:04:28
5 program to -- education for people about female genital
6 mutilation and the harm that it causes.

7 Q And what -- can you repeat that last bit.

8 A And the harm that it causes.

9 Q Thank you. All right. I'm going to go ahead 11:04:44
10 and stop sharing. We might come back to those later.

11 What are you hoping to achieve in this lawsuit?

12 A To further the cause of protecting female and
13 male children equally and preventing unnecessary genital
14 mutilation of any children.

15 Q And what are you asking the Court to do to 11:05:07
16 achieve that goal?

17 A I'm not exactly -- I believe we're -- I know
18 we're challenging the laws. But I'm not a lawyer, and I
19 don't know exactly what specific method by which they're
20 challenging them. 11:05:37

21 Q Okay. Let's go back to Exhibit 1, which is the
22 complaint. So I will pull that up and share my screen
23 again. Nate, can you tell me when you can see my screen.

24 A I can now see your screen.

25 Q Great. So, again, this is Exhibit 1. The -- 11:06:02

1 Q And what is your understanding of what you're 11:07:31
2 asking the Court to do in "little 2B"?

3 A Is to nullify them so that they won't -- that
4 people will no longer be unequally protected and
5 hopefully, eventually, new laws can be put in its place. 11:07:44

6 Q Okay. And what does the word "nullify" mean?

7 A Remove.

8 Q Remove?

9 A Remove. In this context, I would think.

10 Q All right. And so I'm going to go ahead and 11:08:02
11 stop sharing. So just so I understand what you've
12 said -- your understanding of your request to the Court
13 is to strike down the law that prohibits female genital
14 mutilation or to extend it to protect male circumcision;
15 is that correct? 11:08:32

16 A The goal is to extend it, but it's also a
17 potential path to strike it down as well. The goal is to
18 extend it.

19 Q How have you been harmed by the law that
20 requires education and outreach to prevent female genital 11:08:46
21 mutilation?

22 A Because it unfairly leaves males unprotected,
23 and I wasn't protected by that education that should have
24 been there to help the -- of people around me understand
25 what they were doing to me. 11:09:02

1 Q And how have you been harmed by the law that 11:09:04
2 prohibits the practice of female genital mutilation?

3 A Because it needs to apply to both genders
4 equally. It needs to protect both genders.

5 Q And these are both Oregon laws. Do you have 11:09:23
6 any plans to move to Oregon?

7 A Potentially, yes.

8 Q Can you elaborate.

9 A I miss the West Coast a lot. And most of my
10 family lives in Oregon; so I have been considering moving 11:09:38
11 back to Oregon. And it might -- I would say it's
12 probably likely that I move back to Oregon in the next
13 five years or so, but I don't have any strict plans.

14 Q And how will a change in Oregon law affect you
15 if you don't live here? 11:10:00

16 A It will affect me massively because it is a
17 step forward in protecting the people that I want to
18 protect. Because there are people that are in the
19 position that I was in when I was hurt, and I want them
20 to not -- no longer be hurt. I have a lot of family in 11:10:21
21 Oregon, I have a lot of friends in Oregon, and I know a
22 lot of people in Oregon. And when their children are
23 born, I want them to be protected, and I want them to be
24 okay. And knowing that we're getting closer and closer
25 to having everybody be protected is good and would make 11:10:36

1 me feel mentally better, significantly, to know that 11:10:42
2 steps are being made.

3 Q And do you think that striking down, nullifying
4 these two laws that protect female children is going to
5 fix the harm that you specifically have experienced? 11:10:55

6 A I do because I think that that will signify
7 that the Court believes it was unequally protecting. And
8 I don't think anybody in a court is going to stand up and
9 advocate for female circumcision to become allowed. And
10 so it only is a logical conclusion that, if we're 11:11:16
11 protecting one, we should protect the other, in my
12 opinion.

13 Q And can you just elaborate on how that
14 addresses the harm that you have personally experienced.

15 A Well, the harm that I -- sorry. Could you 11:11:38
16 restate that question just one time.

17 Q Yeah. Why is striking down these laws going to
18 address the harm that you have described today as being
19 your circumcision, the physical effects of that -- and
20 you've talked about, like, rejections in your dating 11:12:00
21 life. How is the change in law that you're asking for
22 going to fix those problems?

23 A Because the law unequally protecting me versus
24 other people was what caused the -- was what caused me to
25 get circumcised in the first place. And so by striking 11:12:22

1 down these laws, we will be able to replace them with new 11:12:26
2 laws that will protect both genders, which will help all
3 the children who are being born to not have to go through
4 the same thing that I went through.

5 Q Can you provide a specific example of how it 11:12:51
6 will affect your day-to-day life.

7 A Well, one thing that it would do would be that
8 it would -- I am, I would say, an active participant in
9 advocacy for the cause that I believe in. And so it
10 would bring a change to my daily life to see furthering 11:13:19
11 of the thing that I believe in going across
12 United States. And hopefully it will cause more
13 progress, which can probably, you know, hopefully,
14 eventually move closer to where I currently live and
15 other states and... 11:13:37

16 Q And we've talked mostly about striking down the
17 laws in the last few minutes. But if the Court were to
18 extend the law to prevent male circumcision, how will
19 that affect you?

20 A That would be our -- the significantly better 11:13:53
21 one that I would prefer. And that would -- that would be
22 just an even bigger step. It would be the same thing
23 that I said, just an even bigger step. Because we've
24 gone from being able to have the laws put in place
25 eventually to just having the law put in place already. 11:14:10

1 So that would be an even bigger step, and that would be 11:14:14
2 great.

3 Q And just to make sure I understand what you're
4 saying, you will still be circumcised regardless of what
5 the Court does in this case. So can you help me 11:14:24
6 understand how a change in the law solves that for you?

7 A It doesn't solve my personal circumcision. It
8 solves some of the mental trauma that surrounds my
9 circumcision, but it doesn't fix mine specifically. It
10 fixes people in the future. Because we can try and 11:14:45
11 generate new medical practices all day, but it's better
12 to just leave people alone in the first place, you know.

13 Q And would any change in the female genital
14 mutilation laws that you're challenging impact your
15 day-to-day life at work? 11:15:08

16 A At work? I don't believe so, no.

17 Q What about at home?

18 A At home, not necessarily. I don't think it
19 would.

20 Q And in any future education? 11:15:21

21 A I don't think so.

22 Q All right. Let's go ahead and take another
23 ten-minute break.

24 A All right.

25 (Break in proceedings at 11:15 a.m.) 11:15:47

1 CERTIFICATE OF SHORTHAND REPORTER

2 STATE OF OREGON)
3) ss.
4 COUNTY OF MULTNOMAH)

5 This is to certify that I, Stephanie C.
6 Rhinehart, a Washington Certified Court Reporter, Oregon
7 Certified Shorthand Reporter, and Registered Professional
8 Reporter reported the within and foregoing deposition;
said deposition being taken before me on the date herein
set forth; that the witness was duly sworn by me and that
I was authorized to and did report said proceedings.

9 I further certify that the foregoing
10 transcript is a full, true, and correct record of the
11 proceedings to the best of my ability; that said
12 proceedings were taken by me stenographically and
13 thereafter reduced to typewriting under my supervision;
and that I am neither counsel for, related to, nor
employed by any of the parties to this case and have no
interest, financial or otherwise, in its outcome.

14 I further certify that reading and signing
15 was requested.

16 IN WITNESS WHEREOF, I have hereunto set my
17 hand this 20th day of May, 2026.

18 
19

20 /s/Stephanie C. Rhinehart, RPR
21 Washington CCR No. 22013531
22 Expires 05/26/2027
23 Oregon CSR No. 22-0014
24 Expires 09/30/2028
25

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

DANE HADACHEK; NATHANIEL	)	
HELLEWELL & LONDON MOODY,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 25CV18224
	)	
THE STATE OF OREGON,	)	
	)	
Defendant.	)	

DEPOSITION OF LONDON R. A. MOODY
Taken at the instance of Defendant

* * *

BE IT REMEMBERED THAT, pursuant to the Oregon Rules of Civil Procedure, the deposition of LONDON R. A. MOODY was taken before Stephanie C. Rhinehart, an Oregon Certified Shorthand Reporter, Washington Certified Court Reporter, and Registered Professional Reporter, on Tuesday, April 28, 2026, commencing at the hour of 10:02 a.m., the proceedings being held from the Oregon Department of Justice, 100 Southwest Market Street, Portland, Oregon.

* * *

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14
15 * * *

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* * *

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Exhibit 2	Oregon Revised Statutes, Chapter 163 - 2025 Edition	18
Exhibit 3	Oregon Revised Statutes, Chapter 431A - 2025 Edition	19

(Attached hereto.)

* * *

1 P R O C E E D I N G S

2 THE REPORTER: Before I administer the
3 oath, will counsel please state their appearances.

4 ATTY FORZLEY: Sadie Forzley, S-a-d-i-e
5 F-o-r-z-l-e-y, attorney for Defendant. 00:02:10

6 ATTY MORROW: And Kate Morrow, K-a-t-e
7 M-o-r-r-o-w, also attorney for Defendant.

8 ATTY PERRIGUEY: Lake Perriguey, L-a-k-e
9 P-e-r-r-i-g-u-e-y, attorney for Plaintiff, Landon Moody.

10 00:02:35

11 LANDON R. A. MOODY,
12 Having first been sworn by the Certified Shorthand
13 Reporter to tell the truth, testified under oath as
14 follows:

15

16 EXAMINATION

17 BY ATTY FORZLEY:

18 Q Okay. Let's get started. So we already met,
19 but we'll do it again for the record. I'm Sadie, and
20 this is Kate, my co-counsel, and we represent the State
21 in this lawsuit that you and two other plaintiffs have
22 brought against the State.

00:02:56

23 And we're going to start out with just some
24 general kind of rules or guidelines for how the depo will
25 go. And then I'm going to get into some topics that have

00:03:10

1 A They described what circumcision was and 00:19:19
2 explained to me that I had been circumcised.

3 Q Did anything -- are you aware of anything going
4 wrong with your circumcision?

5 A I'm not aware. 00:19:40

6 Q Did you ask your parents about it?

7 A About what?

8 Q About the event of the circumcision.

9 A In what ways?

10 Q Whether -- just trying to understand if there 00:19:58
11 was any -- anything that went wrong during the
12 circumcision or if your circumcision was what's
13 considered to be a normal, you know, result.

14 A I'm not aware that anything went wrong with the
15 circumcision. 00:20:16

16 Q Okay. And how did you become a plaintiff in
17 this case?

18 A Eric Clopper was searching for plaintiffs, and
19 I volunteered to be one.

20 Q Okay. Did -- how did you come to be aware that 00:21:05
21 Mr. Clopper was searching for plaintiffs? Did he reach
22 out to you personally, or did you -- can you just tell me
23 that.

24 A He reached out to me personally through email.

25 Q Okay. Are you familiar with the two statutes 00:21:54

1 A I understand that Oregon Health Authority shall 00:39:42
2 implement education, prevention, and outreach in the
3 communities that traditionally practice female
4 circumcision, excision, or infibulation.

5 Q Okay. So what are you hoping -- and you can go 00:40:08
6 ahead and put the exhibit away or set it aside. What are
7 you hoping to achieve with your lawsuit?

8 A Hoping to achieve equal protection for both
9 genders.

10 Q Okay. And what is your understanding of the 00:40:27
11 relief that you're seeking from the Court?

12 A My understanding is that we are asking Oregon
13 to extend the law or the two statutes to cover, also,
14 men, males. And for men and women to be treated
15 equally -- or nullify the law, although that would not be 00:40:55
16 ideal.

17 Q Okay. I'm just going to...

18 Okay. I'm going to move on, ask you a few more
19 questions.

20 Have you been harmed by the law requiring 00:41:39
21 education and outreach to prevent female genital
22 mutilation?

23 A You're asking if 431A.600 has harmed me?

24 Q Mm-hmm --

25 A No. 00:42:00

1 Q -- yes. No? 00:42:00

2 A No.

3 Q Okay. How have you been harmed by the law
4 prohibiting the practice of female genital mutilation of
5 minors? 00:42:13

6 A I have not.

7 Q Do you think invalidating the female genital
8 mutilation statutes are going to alleviate the harms that
9 you've alleged in this lawsuit? The harms to you,
10 personally? 00:42:50

11 A Repeat the question.

12 Q Do you think invalidating the statute -- these
13 two statutes will alleviate your personal harms?

14 A No.

15 Q Okay. And if the Court were to extend these
16 laws to prevent and prohibit male circumcision, how will
17 that decision -- how would that decision affect you? 00:43:32

18 A Well, I would be treated equally and protected
19 by the State just as they protect females.

20 Q How will it impact you personally in terms of
21 your own -- you know, you've alleged that you're harmed
22 by being circumcised. So how is that going to impact --
23 or fix things for you? 00:44:06

24 A By extending the law to cover, also, male
25 circumcision, I would no longer be discriminated against 00:44:36

1 by the State of Oregon. 00:44:40

2 Q Okay. And how will -- would that decision in
3 your favor affect your day-to-day life?

4 A I don't know.

5 Q Okay. I'd like to ask you a few more questions 00:45:36
6 about another topic.

7 So what does "stigma" mean to you as it's
8 alleged in this case?

9 A Stigma means to me that one person or group or
10 community is represented differently in a negative 00:46:15
11 context.

12 Q Okay. If we could look at -- actually, no.
13 I'm going to ask you a couple more questions about that.
14 I got a little ahead of myself.

15 A Mm-hmm. 00:46:43

16 Q So what is the stigma to you, personally, as it
17 relates to male circumcision?

18 A That I'm treated differently compared to
19 females.

20 Q Okay. Any other -- anything else on stigma? 00:47:21

21 A I would say that, because I'm not protected by
22 the State of Oregon currently, that I'm treated
23 differently compared to females.

24 Q Can you give me an example of a -- has there
25 ever been a specific time that you felt stigmatized for 00:48:23

1 being circumcised?

00:48:27

2 A I guess when I understood the law and how it
3 doesn't protect me.

4 Q When you say "the law," are you -- what are you
5 referring to?

00:48:46

6 A I'm referring to these two statutes,
7 163 and 431, and how it does not -- there's no, like,
8 comparable law that protects males.

9 Q Okay. And when did you first believe or learn
10 about your personal stigma around this issue?

00:49:14

11 A I don't know the exact date, but when I
12 discovered the law and I read about what Eric Clopper was
13 doing -- and Lake here.

14 Q So that would have been in the last couple of
15 years?

00:49:55

16 A Yeah.

17 Q Okay. Just going to ask my co-counsel
18 something.

19 So you say that you've been treated differently
20 than females. Can you elaborate on that?

00:50:37

21 A Like I said earlier, the statutes 163 and 431
22 do not extend to male circumcision. And because it does
23 not extend, I've been stigmatized because I was treated
24 differently under the law. I was not protected.

25 ATTY FORZLEY: Okay. I'd like to take a

00:51:31

1 short break. Can we go off the record now. 00:51:33

2 (Break in proceedings at 10:49 a.m.)

3 ATTY FORZLEY: Okay. So I don't have any
4 more questions for you.

5 So are you going to ask him any questions, 00:54:27
6 Lake?

7 ATTY PERRIGUEY: I have just a clarifying
8 inquiry.

9 ATTY FORZLEY: Okay.

10 00:54:32

11 EXAMINATION

12 BY ATTY PERRIGUEY:

13 Q So, Mr. Moody, you were asked how or whether
14 these two statutes at issue -- whether they harmed you or
15 how they harmed you, and you said they hadn't. 00:54:46

16 So I wanted to just ask you, if not being
17 treated equally by the law were to be considered a
18 stigmatic harm and not, like, a physical harm, you know,
19 associated -- maybe the first -- I don't know.

20 So if not being treated equally by Oregon law 00:55:04
21 is considered a stigmatic harm, would your answer to that
22 question about whether you've been harmed by those
23 statutes change?

24 A Yes.

25 Q Can you explain that. 00:55:21

1 A Yeah. I wasn't -- needed to further clarify, 00:55:24
2 when I was asked that question, that I was harmed by
3 stigmatic harm because the law did not extend to male
4 circumcision. So they did, in fact, harm me in the
5 stigmatic way -- and that I was not protected. 00:55:50

6 Q Okay. I just wanted to clarify that. Thank
7 you.

8 ATTY FORZLEY: I have a couple follow-up
9 questions.

10 00:56:05

11 FURTHER EXAMINATION

12 BY ATTY FORZLEY:

13 Q So, before, you told me that the law that bans
14 female genital mutilation of minors, ORS 163.207 -- that
15 that law did not harm you. And then your attorney asked 00:56:20
16 you a question, and then you changed your answer, and you
17 said now it does harm you.

18 So before when you told me the statute didn't
19 harm you, what did you mean by that?

20 A I meant that the statutes only covered females. 00:56:40
21 And because I'm not a female, it didn't directly apply to
22 me. But I should have clarified that, indirectly, it did
23 not protect me because it was discriminating against
24 males -- which I am. So indirectly it did harm me
25 because I was not protected. 00:57:07

1 Q But it did not -- the statute does not directly 00:57:09
2 harm you?

3 A It does directly harm me because it does not
4 protect males.

5 Q How does it directly harm you? 00:57:22

6 A It discriminates against me because it does not
7 cover male circumcision, therefore stigmatically harming
8 me.

9 Q Have you ever been denied access to a business,
10 an employment position, education, or something similar 00:57:52
11 based on your status as being someone who's been
12 circumcised?

13 A No.

14 Q Have you ever been harassed or threatened
15 because you were circumcised? 00:58:05

16 A No.

17 Q Okay. Has anything happened to you that's
18 negative -- aside from the harm that you already told me
19 about, the stigma, has anything else happened to you
20 that's negative because you're circumcised? 00:58:16

21 A I was circumcised.

22 Q Okay. I think we're done.

23 All right. You're done.

24 (Deposition adjourned at 10:56 a.m.)

25 * * *

1 CERTIFICATE

2 I, Stephanie C. Rhinehart, a Registered
3 Professional Reporter, Oregon Certified Shorthand
4 Reporter, and Washington Certified Court Reporter, hereby
5 certify that said witness appeared before me at the time
6 and place set forth in the caption hereof; that at said
7 time and place I reported in stenotype all testimony
8 adduced and other oral proceedings had in the foregoing
9 matter; that thereafter my notes were transcribed through
10 computer-aided transcription, under my direction; and
11 that the foregoing pages constitute a full, true and
12 accurate record of all such testimony adduced and oral
13 proceedings had, and of the whole thereof.

14 I further certify that review of the transcript
15 was requested.

16 Witness my hand at Portland, Oregon, this
17 12th day of May, 2026.

18 
19

20 _____
21 Stephanie C. Rhinehart
22 Washington CCR No. 22013531
23 Expires 05/26/2027
24 Oregon CSR No. 22-0014
25 Expires 09/30/2028

FULL TEXT OF BALLOT TITLES—NOVEMBER 4, 2014
MULTNOMAH COUNTY • STATE OF OREGON

ONLY THE CAPTION AND QUESTION WILL APPEAR ON YOUR OFFICIAL BALLOT AND ONLY THE APPROPRIATE MEASURES FOR EACH PRECINCT WILL APPEAR ON THAT PRECINCT’S BALLOT.

STATE MEASURES
Referred to the People by the Legislative Assembly
86 Amends Constitution: Requires creation of fund for Oregonians pursuing post-secondary education, authorizes state indebtedness to finance fund
Result of “yes” vote: “Yes” vote amends constitution and requires legislature to establish fund for Oregonians pursuing post-secondary education, career training; authorizes state to incur debt to finance fund.
Result of “no” vote: “No” vote rejects authorization for state to extend credit and incur debt to create dedicated fund for Oregon students pursuing post-secondary education and career training.
Summary: Amends Constitution. Oregon constitution generally prohibits the state from extending credit or incurring debt. Measure requires the legislature to create dedicated fund for exclusive benefit of Oregon students pursuing post-secondary education, including technical, professional and career training. Measure authorizes state to lend credit and incur debt to finance fund. Indebtedness incurred may not exceed one percent of real market value of all property in state. Moneys in fund not subject to constitutional limitations on investment. Generated earnings must be retained by fund, unless used to provide financial assistance to Oregon students pursuing post-secondary education. If governor declares an emergency, legislature may pass a bill to use the fund’s money for any lawful purpose, provided the legislature also has approved a plan to repay the fund.
Estimate of financial impact: There is no financial effect on either state or local government expenditures or revenues.

Referred to the People by the Legislative Assembly
87 Amends Constitution: Permits employment of state judges by National Guard (military service) and state public universities (teaching)
Result of “yes” vote: “Yes” vote amends constitution to permit state judges to be employed by Oregon National Guard for military service purposes, state public universities for teaching purposes.
Result of “no” vote: “No” vote retains existing constitutional restrictions on employment of Oregon state court judges by the Oregon National Guard and by the state public university system.
Summary: Article III, section 1, of Oregon Constitution (“separation of powers” clause) prohibits person from serving in more than one branch of government at the same time; Oregon Supreme Court has ruled that provision prohibits state court judges from teaching at institutions of public education. Article II, section 10, prohibits state court judges from being compensated for military service in National Guard. Measure amends constitution to authorize any public university as defined by law to employ state court judges for purpose of teaching at Oregon public universities. Measure also authorizes employment of state court judges by Oregon National Guard for purpose of military service. Measure provides that such educational or military employment shall not preclude person from serving as state judge at same time. Other provisions.
Estimate of financial impact: There is no financial effect on either state or local government expenditures or revenues.

Referendum Order by Petition of the People
88 Provides Oregon resident “driver card” without requiring proof of legal presence in the United States
Result of “yes” vote: “Yes” vote directs Department of Transportation to issue “driver card” to Oregon resident meeting specified eligibility, without requiring proof of legal presence in United States.
Result of “no” vote: “No” vote rejects law directing Department of Transportation to issue “driver card” to eligible Oregon resident without requiring proof of legal presence in United States.
Summary: Current law requires any applicant for an Oregon driver license or permit to provide proof of legal presence in the United States. Measure directs the Department of Transportation to issue a “driver card” to an applicant who does not provide proof of legal presence in the United States, but who has otherwise complied with all Oregon requirements for the type of driving privileges sought, has provided proof of residence in Oregon for more than one year, and has provided proof of identity and date of birth. The driver card may not be used as identification for air travel, to enter a federal building, to register to vote or to obtain any government benefit requiring proof of citizenship or lawful presence in United States. Other provisions.
Estimate of financial impact: This measure will require the Oregon Department of Transportation (ODOT) to issue an Oregon Driver Card to an applicant without requiring the applicant to provide proof of legal presence in the United States, if that individual complies with all the requirements for the driving privileges to be sought; provides proof of identity and date of birth; (3) provides proof of residing in Oregon in excess of one year as of the date of the application; (4) provides a Social Security number (SSN) assigned to that individual by the United States Social Security Administration (SSA) or provides a written statement that the individual has not been assigned a SSN; and (5) pays any fees associated with the type of driver card being sought. The cost to provide these cards is estimated at \$2,794,802 in the 2013-15 biennium and \$2,677,144 in the 2015-17 biennium, but revenues are expected to be sufficient to offset these costs to ODOT. The revenue in excess of the costs will be deposited within the State Highway Fund.
The referendum establishes the following fees: (1) \$64 for issuance of a Class C driver card; (2) \$5 for the knowledge test for a Class C driver card; (3) \$9 for the skills test for a Class C driver card; (4) \$64 for issuance of a restricted Class C driver card; (5) \$44 for renewal of a Class C driver card; (6) \$30 for replacement of a Class C driver card; (7) \$6 for the Student Driver Training Fund; (8) \$75 for reinstatement of revoked driving privilege; (9) \$75 for reinstatement of suspended driving privileges; and (10) fee for reinstatement of the right to apply for driving privileges after a delay under ORS 809.280 (10) (1997 Edition), which is the same as the fee for reinstatement of suspended driving privileges.
The referendum provides that the fees charged for an Oregon Driver Card would be used for administrative purposes and distributed to the Highway Fund in the same manner as fees charged for an Oregon Driver License. It is anticipated that this measure will generate \$3,510,437 of revenue in 2013-15 and \$4,333,562 in 2015-17.
There are no anticipated effects on local government.

Proposed by Initiative Petition
89 Amends Constitution: State/political subdivision shall not deny or abridge equality of rights on account of sex
Result of “yes” vote: “Yes” vote amends state constitution, prohibits state and any political subdivision from denying or abridging equality of rights under the law on account of sex.
Result of “no” vote: “No” vote retains current prohibition on laws granting/denying privileges or immunities on account of sex, unless justified by specific biological differences between men/ women.
Summary: Under Article I, section 20, of the Oregon Constitution, laws granting privileges or immunities must apply equally to all persons. The Oregon Supreme Court has held that that provision prohibits laws treating people differently based on sex unless justified by specific biological differences. No current provision in constitution expressly states that prohibition. Measure amends Article I by creating new section 46, which provides that equality of rights under the law shall not be denied or abridged by the state or any political subdivision on account of sex. Measure authorizes legislature to enforce that provision by appropriate legislation. Measure provides that nothing in section 46 “shall diminish a right otherwise available to persons under section 20 of this Article or any other provision of this Constitution.”
Estimate of financial impact: There is no financial effect on either state or local government expenditures or revenues.

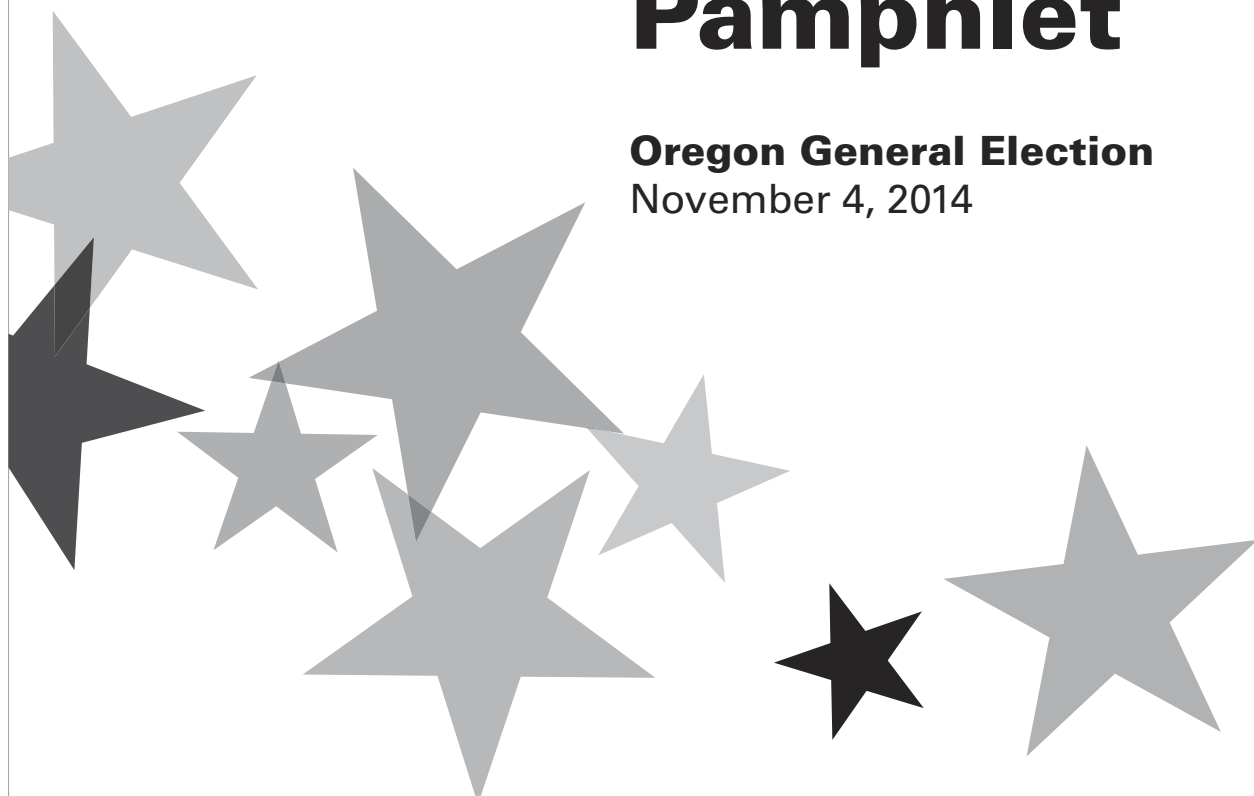
Proposed by Initiative Petition
90 Changes general election nomination processes: provides for single primary ballot listing candidates; top two advance
Result of “yes” vote: “Yes” vote replaces general election nomination processes for most partisan offices; all candidates listed on one single primary ballot; two advance to general election ballot.
Result of “no” vote: “No” vote retains current general election nomination processes, including party primaries for major parties; separate primary ballots; multiple candidates can appear on general election ballot.
Summary: Currently, each major party has a separate primary election ballot. Major party’s registered voters nominate party’s candidates; others’ primary ballots include only nonpartisan candidates; all vote for one candidate per office. General election ballot may include multiple candidates per office: unaffiliated, major, minor party candidates. Measure replaces that system for most partisan offices, including many federal (not Presidential), all state, county, city, district offices. Single primary ballot lists all candidates for each office. Voters may vote for any candidate, regardless of voter’s or candidate’s party affiliation. Only top two candidates per office appear on general election ballot; may be from same party. Primary, general election ballots must contain candidates’ party registration/endorsements. Eligible person, regardless of party, may be selected to fill vacancy. Other provisions.
Estimate of financial impact: This measure changes statutes relating to primary elections. Except for the office of President, it requires that the two candidates receiving the highest number of votes advance to the general election regardless of party affiliation. The measure provides criteria for listing candidates on ballots. It establishes procedures for filling vacant Congressional offices through special elections and allows appointment to vacant state offices regardless of party affiliation. The initiative contains statutory criteria for establishing minority parties and retaining their status. It requires the Legislature to pass implementing statutes.
The Secretary of State Elections Division estimates start-up costs of \$362,640 to modify computer systems. The most likely funding source would be revenues from the General Fund.
Because of the estimated mix of costs and savings, the financial impact to counties is indeterminate.

Proposed by Initiative Petition
91 Allows possession, manufacture, sale of marijuana by/to adults, subject to state licensing, regulation, taxation
Result of “yes” vote: “Yes” vote allows possession, authorizes in-state manufacture, processing, sale of marijuana by/to adults; licensing, regulation, taxation by state; retains current medical marijuana laws.
Result of “no” vote: “No” vote retains laws classifying cannabis as a controlled substance; prohibiting most sale, possession, manufacture of cannabis; permitting production, possession of cannabis for medical use.
Summary: Currently, cultivation, possession, delivery, sale of marijuana are unlawful, excepting regulated production, possession, use of medical marijuana. Measure allows production, processing, delivery, possession, sale of marijuana to adults, licensed, regulated by Oregon Liquor Control Commission (OLCC). Marijuana producer, processor, wholesaler may deliver “marijuana items” (defined) only to/on licensed retail premises. OLCC collects tax imposed on marijuana producer at different rates for marijuana flowers, leaves, immature plant. “Home-grown marijuana” (defined) not regulated, taxed. Tax revenues, fees fund OLCC suspense account, Oregon Marijuana Account distributed: 40% to Common School Fund; 20% for mental health/alcohol/drug services; 15% for state police; 20% for local law enforcement; 5% to Oregon Health Authority. “Marijuana paraphernalia” (defined) excluded from “drug paraphernalia” laws. Other provisions.
Estimate of financial impact: This measure legalizes, regulates and taxes the manufacture, sale and use of marijuana in Oregon. State and local expenditures and revenues will be impacted by passage of this measure.
The measure requires the Oregon Liquor Control Commission (OLCC) to license and regulate the distribution of marijuana. The revenue estimate from taxes when fully implemented may range from \$17 million to \$40 million annually.
The OLCC estimates that the start-up costs are about \$300,000 in state fiscal year 2015, about \$2.5 million in state fiscal year 2016, and \$1.0 million in 2017. OLCC annual operating expenses are estimated to be \$3.2 million per year. New revenues are expected to be sufficient to offset these costs.
The remaining revenue beyond expenses would be distributed as follows: 40% to the Common School Fund, 20% to the Mental Health Alcoholism and Drug Services Account, 15% to the State Police Account, 10% to cities for law enforcement, 10% to counties for law enforcement, and 5% to the Oregon Health Authority for alcohol and drug abuse prevention, early intervention and treatment services.
The Oregon Health Authority estimates \$200,000 per year in additional expenditures for two positions to license marijuana facilities that test marijuana products. This estimate assumes 20 such facilities. New revenues are expected to be sufficient to offset these costs.
The Oregon Department of Agriculture estimates \$100,000 per year in additional expenditures for one position to provide rulemaking related to marijuana-infused food products, engage in outreach to the food industry, and assist members of the food industry to achieve compliance with rules. New revenues are expected to be sufficient to offset these costs.
Oregon State Police estimates that passage of the initiative would create a need for three additional Highway Interdiction Team detectives as well as training of all sworn members in Advanced Roadside Impairment Driving Enforcement and training of some members to join the existing pool of Drug Recognition Experts. The associated start-up costs for additional staffing and training are estimated at \$400,000 in state fiscal year 2016 and ongoing expenses of \$400,000 per year beginning in fiscal year 2016. New revenues are expected to be sufficient to offset these costs.
The Oregon Judicial Department expects additional court costs to address OLCC rulemaking and licensing authority of between \$21,417 and \$55,902 in the 2015-17 biennium and between \$13,068 and \$47,190 per year in later biennia.
Passage of the initiative may result in the reduction in the number of persons entering the public safety system for marijuana-related violations, thereby reducing state General Fund expenditures on community corrections. Passage of the initiative may result in a reduction in the dollar value of fines collected by state and local governments for convictions of marijuana-related violations. Therefore, the impact for state and local governments, district attorneys, and the courts is indeterminate.
New jobs created will generate an indeterminate amount of income tax revenue.

Proposed by Initiative Petition
92 Requires food manufacturers, retailers to label “genetically engineered” foods as such; state, citizens may enforce
Result of “yes” vote: “Yes” vote requires the labeling of raw and packaged foods produced entirely or partially by “genetic engineering,” effective January 2016; applies to retailers, suppliers, manufacturers.
Result of “no” vote: “No” vote retains existing law, which does not require “genetically engineered” food to be labeled as such.
Summary: Current law does not require labeling of “genetically engineered” food. Measure requires retailers of genetically-engineered raw food to include “Genetically Engineered” on packages, display bins, or shelves; suppliers must label shipping containers. Requires manufacturers of packaged food produced entirely or partially by genetic engineering to include “Produced with Genetic Engineering” or “Partially Produced with Genetic Engineering” on packages. Defines “genetically engineered” food as food produced from organisms with genetic material changed through in vitro nucleic acid techniques and certain cell-fusing techniques; exempts traditional plant-breeding techniques like hybridization. Does not apply to animal feed or food served in restaurants. Directs agencies to implement law. Permits state, injured citizen to sue manufacturer, retailer for knowing/intentional violation; attorney fees for prevailing citizen. Other provisions.
Estimate of financial impact: The measure requires the State Department of Agriculture and/or the Oregon Health Authority to prescribe, enact, and enforce rules necessary to ensure that food manufacturers and retailers properly label raw and packaged food that is entirely or partially produced with genetic engineering. The measure is expected to result in direct expenditures by State agencies for initial one time start-up costs estimated at between \$550,000 and \$600,000. Costs associated with ongoing enforcement have variable assumptions about the level of administrative oversight. There are potential indirect economic effects that may be offsetting. Therefore, the direct financial impact and indirect economic impact is indeterminate.
There is no anticipated effect on local government.

Voters' Pamphlet

Oregon General Election
November 4, 2014



vote!



A handwritten signature in black ink, appearing to read "Kate Brown".

Kate Brown
Oregon Secretary of State

This voters' pamphlet is provided for assistance
in casting your vote by mail ballot.

Proposed by initiative petition to be voted on at the General Election, November 4, 2014.

Ballot Title

89

Amends Constitution: State/political subdivision shall not deny or abridge equality of rights on account of sex

Estimate of Financial Impact

74

Text of Measure

75

Explanatory Statement

75

Arguments in Favor

76

Arguments in Opposition

none

Result of “Yes” Vote

“Yes” vote amends state constitution, prohibits state and any political subdivision from denying or abridging equality of rights under the law on account of sex.

Result of “No” Vote

“No” vote retains current prohibition on laws granting/ denying privileges or immunities on account of sex, unless justified by specific biological differences between men/ women.

Summary

Under Article I, section 20, of the Oregon Constitution, laws granting privileges or immunities must apply equally to all persons. The Oregon Supreme Court has held that that provision prohibits laws treating people differently based on sex unless justified by specific biological differences. No current provision in constitution expressly states that prohibition. Measure amends Article I by creating new section 46, which provides that equality of rights under the law shall not be denied or abridged by the state or any political subdivision on account of sex. Measure authorizes legislature to enforce that provision by appropriate legislation. Measure provides that nothing in section 46 “shall diminish a right otherwise available to persons under section 20 of this Article or any other provision of this Constitution.”

Estimate of Financial Impact

There is no financial effect on either state or local government expenditures or revenues.

Text of Measure

The Constitution of the State of Oregon is amended by creating a new section 46 to be added to and made a part of Article I, such section to read:

- SECTION 46. (1) Equality of rights under the law shall not be denied or abridged by the State of Oregon or by any political subdivision in this state on account of sex.
- (2) The Legislative Assembly shall have the power to enforce, by appropriate legislation, the provisions of this section.
- (3) Nothing in this section shall diminish a right otherwise available to persons under section 20 of this Article or any other provision of this Constitution.

Explanatory Statement

Ballot Measure 89 amends the Oregon Constitution to prohibit state and political subdivisions from denying or abridging equality of rights on account of sex.

There is no provision in the Oregon Constitution that expressly prohibits discrimination based on sex. Ballot Measure 89 adds language as a new provision to the Oregon Constitution expressly prohibiting the denial or abridgment of equality of rights on account of sex.

Article I, section 20 of the Oregon Constitution currently provides that: "No law shall be passed granting to any citizen or class of citizens privileges, or immunities, which, upon the same terms, shall not equally belong to all citizens."

The Oregon Supreme Court has interpreted Article I, section 20 to hold that laws may not treat people differently based on sex unless justified by specific biological differences between men and women.

Ballot Measure 89 provides that nothing in Ballot Measure 89 shall diminish any right otherwise available to persons under the Article I, section 20 or any other provision of the Oregon Constitution.

Ballot Measure 89 grants to the Legislative Assembly the power to enforce the provisions of the measure by enactment of appropriate legislation.

Committee Members:	Appointed by:
Leanne Littrell DiLorenzo	Chief Petitioners
Nancy Mead	Chief Petitioners
Fred Neal	Secretary of State
Becky Straus	Secretary of State
Edwin Peterson	Members of the Committee

(This committee was appointed to provide an impartial explanation of the ballot measure pursuant to ORS 251.215.)

Argument in Favor

Argument in Favor

OREGON'S ELECTED LEADERS ENDORSE BALLOT MEASURE 89

Oregon's leaders support measure 89 - an ERA for women's constitutional equality

Governor John Kitzhaber

U.S. Senator Ron Wyden

U.S. Senator Jeff Merkley

Congressman Earl Blumenauer

Congresswoman Suzanne Bonamici

Congressman Peter DeFazio

Congressman Kurt Schrader

Congresswoman Darlene Hooley

Dave Frohnmayr, Former Oregon Attorney General

Oregon Labor Commissioner Brad Avakian

The Honorable Norma Paulus

Oregon State Senate President Peter Courtney

Diane Rosenbaum, Oregon Senate Majority Leader

Senator Laurie Monnes Anderson, Gresham

State Senator Alan C. Bates, Medford

Senator Lee Beyer, District 6

State Senator Ginny Burdick

Senator Richard Devlin

Senator Betsy Johnson, Scappoose

Senator Floyd Prozanski, Dist. 4

Retired State Senator Margaret Carter

Speaker of the House Tina Kotek

Representative Val Hoyle, Oregon House Majority Leader

Representative Brent Barton, Clackamas County

Rep. Peter Buckley (D-Ashland)

State Representative Brian Clem, HD-21

State Representative Lew Frederick

Representative David Gombert

State Representative Mitch Greenlick

Representative Caddy McKeown, Coos Bay

State Representative Tobias Read, Beaverton

(to see full list of updated endorsements visit
www.VoteERA.org)

*(This information furnished by Leanne Littrell DiLorenzo,
VoteERA.org on behalf of Women's Constitutional Equality PAC.)*

Argument in Favor

Please support the Equal Rights Amendment and vote YES on Measure 89

My family and I came to the United States from the Democratic Republic of Congo. As a child growing up in Africa, I was painfully aware of the need to recognize women's importance in society and their human and political rights.

Today, I am a 30 year-old financial professional managing credit risk of commodity trading portfolios for a wonderful employer that values and profits from diversity in its workforce.

Women have great opportunities today and many rights in our state. But I can tell you first hand that we should never take

our rights for granted. Women in less developed countries face a gap in education attainment compared to men. I know of girls pulled from school in order to support their family by having to work menial jobs or be married at a young age.

The plight of women in other countries who struggle to attain equality is enough evidence to demand that our equality be guaranteed, not dependent upon the good graces of others.

I support measure 89 because women should be recognized in the Oregon Constitution and women should have equality of rights and equal opportunities in the workplace.

Without equality written in our constitution, women are vulnerable. There are no unintended consequences to equality.

This November we have a chance to give women guaranteed protection against discrimination. A vote for Measure 89 will make sure our young girls all over Oregon can honestly pursue their dreams and that young girls around the world have an example of what should be for all women.

Please vote yes 89 – let's do this together. Never take our rights and equality for granted.

Krystal Gema

Financial Analyst

(This information furnished by Krystal Gema, Financial Analyst.)

Argument in Favor

Please join me in voting yes on Ballot Measure 89

ALL WOMEN DESERVE THE LASTING PROTECTION OF THE OREGON CONSTITUTION

As the third generation leader of Powell's Bookstore in Portland, books and Oregon are in my blood. I grew up immersed in the remarkable history of our state - my father began his career as a commercial fisherman in the Columbia Gorge, and my grandfather, despite being a transplant from New York, found his roots and his way in Portland. Books were a true love of mine from the very beginning. I was never happier than when I was tucked into a quiet corner, sitting on the store's concrete floor, reading.

Although Powell's was founded by my father and grandfather, I was fortunate to grow up surrounded by powerful women leaders of every stripe. The course of my career has been shaped by the incredible businesswomen I have worked with and been mentored by. I am aware, however, that my experience is rare, even in 2014. As soon as I step out of my day-to-day experience, I encounter a different reality where the rights of women are challenged continuously.

I am particularly concerned about women's leadership in Oregon. The path to leadership is a path still denied to many because of an inequality in pay and an inequality in opportunity.

I see women forced to fight battles that waste their time and energy, and deny our communities of their gifts. We need those gifts in order to thrive as a society; without them, we all suffer.

Every day, women are accomplishing great things, and I believe we all have reason to feel optimistic about the future. **When I cast my yes vote on measure 89,** I'll be doing so for the many women who have led us to this better place, and for the women of the next generation who will make our world better still.

Emily Powell
Owner and President, Powell's Bookstore

(This information furnished by Emily Powell, Owner and President, Powell's Bookstore.)

Argument in Favor

VOTE YES on 89

My family homesteaded along the banks of the Willamette River back in 1853 before Oregon was a state and before women had the right to vote or serve on juries. At that time the women in my family were limited in their ability to make basic choices about their lives such as whether or not to attend school, choose a job, or even what clothes to wear.

I cannot imagine what life was like for women in my family, and yours, to live with such inequity. Although women's rights have evolved and are remarkably different today, we still have room for improvement.

Today, women still make less than men, on average, and for too many, there is still a strong gender gap preventing upward mobility.

Many decisions in life are complex; this one is not. We are all equal, with equal rights, regardless of sex. As a father of two girls and an employer of over 5,000 hard working women in our company, I am proud to support placing the Equal Rights Amendment in the Oregon Constitution.

IT'S ABOUT TIME

It has been over 90 years since the original ERA was first drafted. Join my wife Erika and me in voting YES for ballot measure 89. Say yes to the fact that all people in Oregon are equal. As a 7th generation Oregonian, I believe the ERA accurately reflects both our values and our deep respect for women in this great state. Let's be the 23rd state to stand up and recognize, once and for all, that men and women are equal in every way. Following what should be an overwhelming victory for women in Oregon, it is time for the ERA to be memorialized in the US Constitution as well.

Let's finally get it right for all women in Oregon.

VOTE YES on 89

Rick and Erika Miller
Founder and Chairman, The Avamere Group
Co-Founder, Rogue Venture
Partners

(This information furnished by Leanne Littrell DiLorenzo, VoteERA.org, Women's Constitutional Equality PAC.)

Argument in Favor

Boys and Girls Club Director is Voting YES on Ballot Measure 89

I am Denise Gould, Chief Professional Officer of the Boys and Girls Club of Southwestern Oregon for 13 years. Our mission is to assist "all youth to achieve their fullest potential by enhancing their self-esteem, providing positive role models, and by helping them to develop the qualities needed to become caring, productive, responsible citizens."

Ballot Measure 89 is perfectly aligned with the Boys and Girls Club mission, and I am voting YES.

In my work, I have observed that young women face challenges, especially when they hit middle school age. Many girls begin to lose confidence, speak less in class, and shy away from leadership roles. This is especially true for many young women I work with at the Boys and Girls Club who are from lower income households, often being raised by a single parent, usually a mother, who is struggling to both work and care for her children. These young women have few opportunities and mentors.

How can we expect young women to achieve their fullest potential if they do not have equal rights in our constitution?

We try to encourage girls through activities and programs like "Smart Girls," but it is difficult when there continue to

be hurdles for young women today, such as pay inequity, discrimination and harassment, and domestic violence—all eroding young women's confidences and making achievement more difficult.

Ballot Measure 89 will place the Equal Rights Amendment in the Oregon Constitution and will remove one significant hurdle for young women in Oregon. An Oregon Equal Rights Amendment places boys and girls on an equal plain in our state. The young women of our state need this so that they can do whatever they want to do and become whatever they want to become.

Join me in voting YES on Ballot Measure 89!

Denise Gould, Chief Professional Officer of the Boys and Girls Club of Southwestern Oregon

(This information furnished by Denise Gould, Boys and Girls Club of Southwestern Oregon.)

Argument in Favor

America was founded on the guarantee of equal rights under the law.

But, too often, our nation has failed to live up to that promise.

This fall, we can do something about that in Oregon. We can support the Oregon equal rights amendment.

We're voting YES for the equal rights measure to assure basic rights cannot be denied or restricted to any Oregonian simply because she is a woman.

If we Oregon voters pass this measure, every woman will be guaranteed the right to control her own life, to liberty in her choices including healthcare, and to pursue the happiness she chooses for herself.

We recognize that Oregon already protects rights equally in many important aspects. But our state constitution could do more.

Oregon law now allows for unequal rights based on biological differences between women and men. We believe biological differences should not be a basis for discrimination. Passage of Measure 89 will affirm Oregonians' repeated support for women's right to the full range of reproductive options.

When every Oregon woman is secure in her right to decide whether and when to become a mother -- with help from people she trusts that may include her family, doctor or her faith -- we will truly protect rights equally.

Please join us in voting yes on Measure 89 to protect every woman's right to choose.

Michele Stranger Hunter, Executive Director NARAL
Pro-Choice Oregon
Laura Terrill Patten, Executive Director, Planned Parenthood
Advocates of Oregon

(This information furnished by Laura Terrill Patten, Planned Parenthood Advocates of Oregon.)

Argument in Favor

City Club of Portland Recommends a Yes Vote Equality Belongs in Our Constitution

What does this measure do?

Under current Oregon law, legal protections against sex-based discrimination are as strong as the state law protections against discrimination based on other suspect classifications, such as race, skin color, and religion. This measure adds to the Oregon Constitution a separate, explicit, state-level protection against sex-based discrimination.

Why has this been proposed?

In 1972, a proposed federal Equal Rights Amendment (ERA) was approved by Congress that would have provided for sex-based equality in the U.S. Constitution, but required ratification by three-fourths of the states. After opponents became increasingly effective, the amendment failed.

Over the past three years the movement to restrict reproductive education and healthcare has grown more active. City Club documents a nearly 300 percent increase between 2011 and 2012 in challenges to reproductive rights across the United States. The 2014 U.S. Supreme Court case *Burwell v. Hobby Lobby Stores, Inc.* allows private companies to use religious exemptions against providing certain reproductive options. This shows the extent to which women continue to be subject to discrimination based on sex.

Why vote Yes?

- Preserves equality between men and women for future generations
- Would not diminish any rights under the Oregon State Constitution
- A No vote could be interpreted as a lack of support of equality for women
- Help defend against possible challenges to equal access to healthcare and reproductive rights for women
- Inspire support for the idea of a federal constitutional amendment to strengthen women's rights nationwide

City Club Members Vote:

Yes 67%

No 33%

Who is City Club of Portland?

We bring together civic-minded people to make Portland and Oregon better places to live, work and play for everyone. Read our complete recommendation and become a City Club member at:

www.pdxcityclub.org

(This information furnished by Karen Kervin, President, City Club of Portland.)

Argument in Favor

Fellow voters,

I was born in Louisiana, one of nine children. My father was a minister and my mother was a cafeteria worker. I worked my way through college and ultimately received a master's degree.

I know first hand about the hard work it takes to fight for equality.

For years, as a citizen, state representative and a state senator, I lobbied, marched, rallied, petitioned, picketed, and exerted as much influence as I could muster to help minimize the inequities, which the government placed between men and women.

Like many women of color of my generation, I had to fight to be treated as an equal.

Despite challenges and inequalities I faced, I worked my way into a position of leadership in my community. After several years working as a counselor, I was recruited to run for the Oregon House of Representatives. I was the first African American woman elected to the Oregon Legislature.

We should not mistake the great strides women have made for full equality under the law.

In parts of our country, women's rights are rolling backward. Here in Oregon, women's equality is based solely on

decisions of the courts. As a veteran of women's battles for equality, I believe we need language in the Constitution that guarantees our equal rights. Measure 89 will once and for all, have the Constitution say exactly what most think it should mean. Legislatures and courts can change over time. But once Measure 89 is in the Constitution, no court or legislature will be able to deprive us of our fundamental equal rights.

An older generation fought many battles to bring women where they are today. Young people, we hope will honor the struggles of those who have made a better place for them. Measure 89 does that and will do more than anything else to preserve and further our hard fought gains.

Please Vote for Measure 89.

Margaret L. Carter
Retired State Senator

(This information furnished by Margaret L. Carter, Retired State Senator.)

Argument in Favor

I am voting yes on ballot measure 89.

I am supporting measure 89 in our Oregon Constitution because I do not believe that the state or government should discriminate against women based on sex. The Oregon Constitution did not take women into account when it was written.

When I entered the restaurant industry in the mid 1960's, opportunities for women were very limited. Virtually all fine dining establishments at that time were exclusive to male staff.

Jake's Famous Crawfish in Portland was our first venture in the development stages of McCormick & Schmick's Restaurant chain. Our team aggressively recruited and trained an all female staff which assured that women were now in equal paying positions working as managers, chefs, servers and hourly employees.

Though there have been extraordinary strides in the hospitality industry, the laws of our state relative to equal rights for women are archaic. We recognized the extraordinary talents of women and how their skills were underutilized.

Certainly half the population of the state should have their equality expressed in the Constitution! I have daughters and grand daughters I want them to have the Constitutional protection they are entitled. Measure 89 will make that happen. It's about time.

Please join me in voting YES for Measure 89.

William P. McCormick
U.S. Ambassador to New Zealand 2005-2008
Chair Emeritus McCormick & Schmick's

(This information furnished by William P McCormick, Ambassador.)

Argument in Favor

I was born and raised on a wheat ranch in Pendleton Oregon.

I am a strong supporter for ballot measure 89 and I hope you will join me in voting yes.

My brother and I are the 5th generation on our Eastern Oregon family ranch and grew up working side by side. I was the first female wheat truck driver for our ranch and drove our 18-wheeler truck hauling wheat to the Port of Umatilla elevators.

I participated in sports just as women's athletics were gaining popularity in high school. My basketball teammates and I were the first four-year girls basketball letter winners. I also grew up riding horses, competing in rodeos and was honored to serve as the Queen of the Pendleton Round Up in 1982.

Decl of Kate E. Morrow
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The opportunities I had were because of my family and the fact that they treated me as an equal. They believed I could do anything a boy of my age could do and I have treated my own two daughters the same way.

Equal rights for women belong in our Oregon constitution. When we consider other rights we do have in the constitution, it is clear that women will gain a higher level of protection against sex discrimination than we have now.

The ERA is not a symbolic gesture, it is providing women constitutional protection and full equality in the Oregon Constitution that they have never had.

Voting yes on ballot measure 89 means women in Oregon will finally have their state constitution recognize them. Providing equality expressly in our constitution means women will not be vulnerable to losing rights they have achieved and the ERA will provide a future path to help women eliminate inequalities that still exist.

Please join me in supporting Ballot Measure 89.

Katy Thorne Coba, Salem (formerly Pendleton)

(This information furnished by Katy Thorne Coba, Salem (formerly Pendleton).)

Argument in Favor

We need Ballot Measure 89 to pass!

Women are still not equal in our U.S. Constitution

Women do not have equality expressly in the Oregon Constitution

As a former Member of Congress from the 5th District, I am astounded that women are still not equal under the U.S. Constitution. Some may think the Equal Rights Amendment was placed in our U.S. Constitution in the 1970s, however, it fell three states short of ratification. While laws have been passed with the intention of providing women protection, women's rights have been rolling backward for decades.

It is necessary to place the Equal Rights Amendment in the Oregon Constitution

The rights we want most protected are in our constitutions. Our communities will benefit when all members of our families have equality. I remember when, not too long ago, women could not attend particular classes because they were for boys only. Girls had minimal access to sports. While some inequalities have resolved, women have never been afforded express protection in our constitution. Under earlier interpretations of our constitution, women could not serve on juries, or work the same jobs, or same hours, as men.

We still have more work to do.

Supporting Measure 89 is part of my life long mission to make a difference in my community. I became involved in politics in 1976 because I wanted to make safer playgrounds for children. From there, I became the first woman to sit on the West Linn City Council. Let's do something for women this time.

Please join me in voting YES on Ballot Measure 89.

Congresswoman Darlene Hooley

(This information furnished by Congresswoman Darlene Hooley.)

Argument in Favor

THERE IS BI-PARTISAN SUPPORT FOR PLACING THE ERA IN THE OREGON CONSTITUTION

Dear Legislators, THANK YOU for being early supporters of the ERA.

Ballot Measure 89 uses the same language from two bills introduced in the 2013 legislature, SJR 24 and HJR 21. Measure 89 also includes amendments that were proposed for those bills during the 2013 legislature. <https://olis.leg.state.or.us/liz/2013R1/Measures/list/> Here is the key language:

SECTION 46. (1) "Equality of rights under the law shall not be denied or abridged by the State of Oregon or by any political subdivision in this state on account of sex."

(2) "The Legislative Assembly shall have the power to enforce, by appropriate legislation, the provisions of this section."

(3) "Nothing in this section shall diminish a right otherwise available to persons under section 20 of this Article or any other provision of this Constitution." (Note: Subparagraph (3) was proposed as an amendment to these bills.)

The legislative website shows the following state senators and state representatives who sponsored or co-sponsored one or more of these bills:

SENATE DEMOCRATS: Arnie Roblan, Elizabeth Steiner Hayward, Alan Bates, Lee Beyer, Ginny Burdick, Richard Devlin, Jackie Dingfelder, Mark Hass, Betsy Johnson, Floyd Prozanski, and Diane Rosenbaum.

SENATE REPUBLICANS: Brian Boquist, Herman Baertschiger, Ted Ferrioli, Tim Knopp, Bruce Starr, Chuck Thomsen, and Jackie Winters

HOUSE DEMOCRATS: Jeff Barker, Phil Barnhart, Brent Barton, Debbie Boone, Peter Buckley, Brian Clem, Michael Dembrow, Margaret Doherty, Chris Garrett, David Gomborg, Mitch Greenlick, Val Hoyle, Alissa Keny-Guyer, Caddy McKeown, Jeff Reardon, and Tobias Read

HOUSE REPUBLICANS: Cliff Benz, Jason Conger, John Davis, Sal Esquivel, Wally Hicks, Mark Johnson, Bill Kennemer, Wayne Krieger, Mike McLane, Julie Parrish, and Vicki Berger

Vote YES on 89

Women gained the right to vote in Oregon in 1912 by turning to the initiative. We also turn to the initiative to add an ERA to the Oregon Constitution and look forward to the day the Federal Constitution contains an ERA.

Onward and Forward—

VoteERA.org team

(This information furnished by Leanne Littrell DiLorenzo, VoteERA.org, Women's Constitutional Equality PAC.)

Argument in Favor

VOTE YES ON MEASURE 89

As a teacher, and later Dean and Principal at Marshfield High School in Coos Bay, I worked with young people for 32 years, helping them to realize positive outcomes as they moved on to college or into the workforce. I was often troubled that young women I worked with thought their opportunities after graduation were limited.

THERE IS STILL MORE TO DO

Women's opportunities are still limited by a pay disparity in the workplace. Young women on college campuses still find themselves fighting for the respect necessary to take full advantage of their academic opportunities.

MEASURE 89 WILL WRITE EQUALITY INTO THE CONSTITUTION

Measure 89 will, for the first time, specifically guarantee women express equality in our constitution. Legal authorities including the Oregon Attorney General, the State of Oregon's Legislative Counsel and four recently retired Oregon

Decl of Kate E. Morrow
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Supreme Court Justices have provided opinions that explain why we need an Equal Rights Amendment in our Oregon Constitution. Measure 89 advances the cause of women and does not diminish any other rights.

THE EQUAL RIGHTS AMENDMENT HAS BROAD BI-PARTISAN SUPPORT

It is no wonder that Measure 89 is endorsed by so many public officials and leading citizens from all corners of our state. During the 2013 regular legislative session, virtually identical proposals won the bi-partisan sponsorship of 51 members of the legislature. An Equal Rights Amendment in the Oregon Constitution is truly an idea whose time has come.

ESTABLISHES POLICY

Measure 89 will establish a “no unequal treatment” policy in our state Constitution.

VOTE YES ON 89

As a State Senator and former Co-Speaker of The House of Representatives, I strongly support Measure 89 and urge you to join me in voting yes on Measure 89.

State Senator Arnie Roblan

(This information furnished by State Senator Arnie Roblan.)

Argument in Favor

AFSCME supports expressly putting equality for women into the Oregon Constitution. Our union has a fundamental belief in equality and believe that putting this language in our state constitution is important to ensuring equality for women in our state. As a union that represents working people all over the state, we are in a constant struggle to improve the working standards for all people. Even in 2014, women are frequently paid less for the same work than men and they are often the victims of harassment and hostile working situations. This measure will not fix all the problems in the workplace, but it is a move in the right direction.

It's important that we send a message that women are supported in our state — this measure will make that clear. Over 60 percent of AFSCME's membership is made up of women and we want to make sure that they are protected from attacks on their equality. There's little reason to oppose this measure and we believe it is in everyone's best interest to support it.

Please vote YES on Measure 89 and support women's rights.

(This information furnished by Joe E Baessler.)

Argument in Favor

Lane County Residents urge a YES vote on Ballot Measure 89

We are a diverse group of Lane County business owners, educators, attorneys, and other professionals coming together for this simple message:

We are voting Yes on Ballot Measure 89 to place an Equal Rights Amendment in the Oregon Constitution.

We have the largest university in the state and other great education institutions. The majority of students who attend those institutions are local Oregonians and half of those attending are women.

Half those students will have a more difficult time becoming CEOs of companies. Half of those students will earn less for the same job than the other half. Half those students are more likely to be heads of households while raising families as a single parent.

“Women in state government make about 88 percent of what men do,” *Statesman Journal*, August 11, 2014, <http://www.statesmanjournal.com/story/news/politics/2014/08/10/women-paid-percent-men-state-government/13837901/>

We encourage young women to be whatever they want to be, but the truth is, statistically that is more difficult for them.

With your yes vote today, Oregon women will finally have full equality in the Oregon constitution.

Women and girls should have their equality written into the constitution.

Without a state ERA, women are left grasping for equality here and there – fighting for equal pay, fighting for protection against domestic violence, fighting for inclusion.

Let's stop that piecemeal approach to equality, let's include over half our population in our state constitution.

Please join us in voting YES on Ballot Measure 89.

Nikos Ridge, CEO, Ninkasi Brewing Company
Erin Gould, Attorney, VoteERA.org board member
Lee Davidson MD, Emergency Physician and Partner in Eugene Urgent Care
Kamala Shugar, Attorney
Margaret Hallock, Economist and Policy Advocate
Ofer Raban, Constitutional Law Professor
Marshall L. Wilde, Attorney
Evangelina Sundgren, Lane County
Gilad Gozlan, Life Cycle Bike Shop Owner
Susan Cundiff, Educator
Charlie Swanson, Teacher

(This information furnished by Erin Gould, Attorney, VoteERA.org board member.)

Argument in Favor

I urge you to vote YES on Ballot Measure 89.

I'm supporting and Oregon ERA and measure 89 because:

- We still do not have equal pay for equal work and I believe that wages should not be determined by gender but the quality of your work.
- Protections for women's rights are subject to the winds of political change as we have seen in other states where legislation is being passed to roll back our rights. Oregonians have an opportunity to ensure equality for women is enshrined in our constitution.
- In 1972, I watched my mother work incredibly hard to pass the federal ERA, but still after almost half a century it has not been ratified to the U.S. Constitution.

But, I am proud to carry on the efforts of my mother and the many individuals who have fought for women's equality over the years by ensuring that equal rights for women becomes a reality here in Oregon.

I am voting YES on Ballot Measure 89 and I hope you will too.
Representative Val Hoyle
Oregon House Majority Leader

(This information furnished by Leanne Littrell DiLorenzo, VoteERA.org, Women's Constitutional Equality PAC.)

Argument in Favor

The Central Oregon Coast Says Vote YES on Measure 89

Voters on the Central Oregon Coast want equality for women written into Oregon's Constitution. We do not want to rely on case law for one of our most basic human rights. Case law is judge made law that does not always reflect the will of the people. It can erode over time as the composition of the judiciary changes. A law written into the constitution is a law written by and voted on by the people and it takes a vote of the people to change it.

Measure 89 Protects Everyone

There are a few who fear that passing the Oregon Equal Rights Amendment (ERA) may elevate the rights of women over others. They are misguided. The proposed ERA protects

all people, not just women, from sex discrimination. Also, paragraph 3 of the proposed ERA makes it clear that nothing in the Amendment will diminish the rights of persons otherwise available to them under Article 1 Section 20 or any other provision of the constitution.

Women are not fully recognized in Oregon's Constitution

Passing the Oregon Equal Rights Amendment will make clear that inequality of women is not acceptable to the people of Oregon. It will tell our mothers, wives, daughters and granddaughters that they are of equal importance and entitled to the same privileges and same responsibilities as men.

PLEASE JOIN US IN VOTING YES ON MEASURE 89

Representative **David Gomberg**
Lincoln County Commissioner **Bill Hall**
Sandra Roumagoux, Mayor of Newport
Nancy Campbell Mead, former Circuit Court Judge
Linda Kilbride, Newport
John and Judy Kreitmeyer, Lincoln City
Michele Walters, Depoe Bay
Michele Longo Eder, Newport
Elliott and Daniella Crowder, Newport
Gary Lahman and Cynthia Jacobi, Newport
Kate Madison, Depoe Bay
Patricia Heringer, Lincoln City
Jeanne St. John, Newport
Ruth Kistler, Newport
Billie Jo Smith, Toledo
Nel Ward and Sue Hardesty, Newport
Jan Eisele, Pacific City

(This information furnished by Nancy Campbell Mead, Former Circuit Court Judge.)

Argument in Favor

Voting YES on the Oregon Ballot Measure 89 gives Oregonians the opportunity to correct a great injustice to women!

That injustice is the fact that our Oregon constitution does not give women the strongest possible protection against discrimination based on sex. In short, women in Oregon MUST have that constitutional protection. Without women's equality written in the Oregon Constitution, women will forever be in a second-class position to men. We need to pass measure 89 to make absolute sure women do not go another day without the full protection against sex discrimination in any part of their lives.

As a community activist, I see women in a myriad of roles, fighting to succeed at every level. As a former corporate board member on Portland General Electric and Oregon Physicians Service board, I know first hand that women deserve the same guarantee of equality as men.

I was appalled to learn that Oregon women were not afforded protection in our constitution from sex discrimination.

I urge all Oregonians to vote YES on Measure 89, and pass the Oregon ERA. You can feel good knowing you are positively affecting the lives of your wives, daughters, granddaughters and friends and community.

Your yes vote on measure 89 gives more than fifty percent of Oregonians recognition in Oregon's constitution; recognition that they do not currently have.

"She flies with her own wings" is Oregon's motto, but how can we fly when our wings are being clipped? I believe Oregonians are proud of their state. I'm sure we will feel even greater pride as we vote yes on Measure 89 and it passes with a strong yes vote.

I fervently ask you to join me in voting yes on measure 89 and supporting all Oregon women.

Gwyneth Gamble Booth
Chairman of the Board, PGE Foundation
Board President, Portland Japanese Garden
Facilitator, The Dougy Center for Grieving Children and Families

(This information furnished by Gwyneth Gamble Booth, Chairman of the Board, PGE Foundation; Board President, Portland Japanese Garden; Facilitator, The Dougy Center for Grieving Children and Families.)

Argument in Favor

OREGON DOES NOT HAVE THE STRONGEST POSSIBLE PROTECTION AGAINST SEX DISCRIMINATION

As a former Oregon Supreme Court Justice, I strongly urge you to Vote YES on measure 89.

For over 8 years I served as an associate Justice on the Oregon Supreme Court, 10 years on the Court of Appeals and 10 years as a trial court judge. Prior to that, I was a lawyer in a law firm that admitted our first woman partner (a first for Portland) in 1968.

I signed an open letter with several of my colleagues about the Oregon ERA to support its addition to the Constitution and to point out errors some opponents have made in their criticism of this effort. You can find a copy of the open letter by visiting <http://www.VoteERA.org>.

- **As the Attorney General has made clear, no current provision in the Constitution expressly provides protections for women.**
- **Measure 89 will go farther to protect women than current judicial interpretations.**
- **Women's equality is not expressly provided in our Constitution.**

YES on Measure 89 guarantees that neither the state nor a political subdivision of the government can ever discriminate based on sex.

If you hear that the measure "is unnecessary", or there are "unintended consequences" or "concerns" that rights of others could be affected by an ERA, I can tell you there is no evidence to back up any of those assertions.

Measure 89 makes clear that nothing in the measure shall diminish any rights available to any person under the constitution. At least 22 states have adopted equal rights amendments in their constitutions. Not one of these so-called and unidentified "concerns" has ever come to pass in those states.

Measure 89 will acknowledge the contributions and importance of more than 50% of our citizens by finally providing women deserved express recognition in our state's most important document, its constitution. Please join me in voting for Measure 89.

Justice Richard William Riggs
Retired Justice Oregon Supreme Court

(This information furnished by Justice Richard William Riggs, Retired Justice Oregon Supreme Court.)

Argument in Favor

Vote YES on Ballot Measure 89

We are proud to have the endorsements of great organizations across Oregon.
Standing up for women's equality in the Oregon Constitution.

American Association of University Women (AAUW)

League of Women Voters of Oregon

Boys & Girls Club of Southwestern Oregon

Susan I. Stoltenberg, YWCA of Greater Portland

Oregon Education Association

Oregon Business Association (OBA)
Oregon NOW (National Organization for Women)
Frank Dixon, Chair, Democratic Party of Oregon
Urban League
Oregon Nurses Association
Willamette Women Democrats
Multnomah County Democratic Party
Adelante Mujeres
Oregon AFSCME
Joseph R. Esmonde - IBEW #48

Please join us in voting YES on Measure 89

*(This information furnished by Leanne Littrell DiLorenzo,
VoteERA.org, Women's Constitutional Equality PAC.)*

1 **CERTIFICATE OF SERVICE**

2 I certify that on July 2, 2026, I served the foregoing DECLARATION OF KATE E.
3 MORROW IN SUPPORT OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT upon
4 the parties hereto by the method indicated below, and addressed to the following:

5 Lake James H. Perriguey
6 Law Works LLC
7 1906 SW Madison St.
8 Portland, OR 97205
9 *Attorney for Plaintiffs*

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 OVERNIGHT MAIL
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9 Eric Clopper
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11 2482 Cheremoya Ave.
12 Los Angeles, CA 90068
13 *Attorney for Plaintiffs*
14 ** pro hac vice*

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