

Filed
Superior Court of California,
Sacramento
02/13/2024
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By _____, Deputy
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17 JONATHAN ZACHRESON

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF SACRAMENTO

14 PROTECT KIDS CALIFORNIA and
15 JONATHAN ZACHRESON, Individually
16 and behalf of PROTECT KIDS
17 CALIFORNIA

18 Petitioners,

19 v.

20 ROB BONTA, in his official capacity as
21 Attorney General of California and
22 DOES 1-50, inclusive,

23 Respondents.

Case No.

**PETITIONERS' REQUEST FOR
JUDICIAL NOTICE IN SUPPORT OF
WRIT PETITION**

Department:
Judge:

Action filed:
Trial date: None set

23 **TO THIS HONORABLE COURT AND TO ALL PARTIES AND COUNSEL OF**
24 **RECORD:**

25 PLEASE TAKE NOTICE that pursuant to *Evidence Code*, sections 451 and 452,
26 Petitioners PROTECT KIDS CALIFORNIA and JONATHAN ZACHRESON (hereinafter
27 collectively "Petitioners") will and hereby do request that this Court take judicial notice of the
28 following in support of Petitioners' Writ Petition, filed currently herewith:

BY FAX

1 1. Alabama Senate Bill 184, titled the “Vulnerable Child Protection Act.” (Passed
2 2022-04-07; Assigned Act No. 2022-289..) “Judicial notice shall be taken of the following:…
3 (b) Regulations and legislative enactments issued by or under the authority of the United States
4 or any public entity in the United States. (c) Official acts of the legislative, executive, and judicial
5 departments of the United States and of any state of the United States. … (h) Facts and
6 propositions that are not reasonably subject to dispute and are capable of immediate and accurate
7 determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b),
8 (c), (h).)

9 2. Arkansas House Bill 1570, titled the “Arkansas Save Adolescents from
10 Experimentation (Safe) Act.” (Passed 2021-04013; Assigned Act 626.) “Judicial notice shall be
11 taken of the following:… (b) Regulations and legislative enactments issued by or under the
12 authority of the United States or any public entity in the United States. (c) Official acts of the
13 legislative, executive, and judicial departments of the United States and of any state of the United
14 States. … (h) Facts and propositions that are not reasonably subject to dispute and are capable
15 of immediate and accurate determination by resort to sources of reasonably indisputable
16 accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

17 3. Arizona Senate Bill 1138, titled “Prohibition of Irreversible Gender
18 Reassignment Surgeries for Minors.” (***Passed 2022-03-30; Assigned Chapter 104.***) “Judicial
19 notice shall be taken of the following:… (b) Regulations and legislative enactments issued by or
20 under the authority of the United States or any public entity in the United States. (c) Official acts
21 of the legislative, executive, and judicial departments of the United States and of any state of the
22 United States. … (h) Facts and propositions that are not reasonably subject to dispute and are
23 capable of immediate and accurate determination by resort to sources of reasonably indisputable
24 accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

25 4. Florida Senate Bill FL CS/SB254, titled “An act relating to treatments for sex
26 reassignment.” (Passed 2023-05-18; Assigned Chapter 2023-90.) “Judicial notice shall be taken
27 of the following:… (b) Regulations and legislative enactments issued by or under the authority
28 of the United States or any public entity in the United States. (c) Official acts of the legislative,
executive, and judicial departments of the United States and of any state of the United States. …

1 (h) Facts and propositions that are not reasonably subject to dispute and are capable of immediate
2 and accurate determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code,
3 §§ 452(b), (c), (h).)

4 5. Georgia Senate Bill 140, titled “An Act relating to regulation of hospitals and
5 related institutions, so as to prohibit certain surgical procedures for the treatment of gender
6 dysphoria in minors.” (Passed **2023-03-23; Assigned SB140/AP.**) “Judicial notice shall be taken
7 of the following:... (b) Regulations and legislative enactments issued by or under the authority
8 of the United States or any public entity in the United States. (c) Official acts of the legislative,
9 executive, and judicial departments of the United States and of any state of the United States. ...
10 (h) Facts and propositions that are not reasonably subject to dispute and are capable of immediate
11 and accurate determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code,
12 §§ 452(b), (c), (h).)

13 6. Idaho House Bill 71, titled “Vulnerable Child Protection Act.” (Passed 2023-04-
14 06; Assigned House Bill 71.) “Judicial notice shall be taken of the following:... (b) Regulations
15 and legislative enactments issued by or under the authority of the United States or any public
16 entity in the United States. (c) Official acts of the legislative, executive, and judicial departments
17 of the United States and of any state of the United States. ... (h) Facts and propositions that are
18 not reasonably subject to dispute and are capable of immediate and accurate determination by
19 resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

20 7. Indiana Senate Enrolled Act 480, title “Gender Transition Procedures for
21 Minors.” (Passed 2023-04-5; Assigned Senate Enrolled Act No. 480.) “Judicial notice shall be
22 taken of the following:... (b) Regulations and legislative enactments issued by or under the
23 authority of the United States or any public entity in the United States. (c) Official acts of the
24 legislative, executive, and judicial departments of the United States and of any state of the United
25 States. ... (h) Facts and propositions that are not reasonably subject to dispute and are capable
26 of immediate and accurate determination by resort to sources of reasonably indisputable
27 accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

28 8. Iowa Senate File 538, titled “An act relation to Prohibited Activities regarding

1 gender transition procedures relative to minors and including effective date and applicability
2 provision.” (Passed 2023-03-22; Assigned Senate File 538.) “Judicial notice shall be taken of
3 the following:... (b) Regulations and legislative enactments issued by or under the authority of
4 the United States or any public entity in the United States. (c) Official acts of the legislative,
5 executive, and judicial departments of the United States and of any state of the United States. ...
6 (h) Facts and propositions that are not reasonably subject to dispute and are capable of immediate
7 and accurate determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code,
8 §§ 452(b), (c), (h).)

9 9. Kentucky Senate Bill 150, titled “An Act Related to Children.” (Passed 2023-03-
10 29; Assigned Acts Chapter 132.) “Judicial notice shall be taken of the following:... (b)
11 Regulations and legislative enactments issued by or under the authority of the United States or
12 any public entity in the United States. (c) Official acts of the legislative, executive, and judicial
13 departments of the United States and of any state of the United States. ... (h) Facts and
14 propositions that are not reasonably subject to dispute and are capable of immediate and accurate
15 determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b),
16 (c), (h).)

17 10. Louisiana House Bill 648, titled “Prohibits certain procedures to alter the sex of
18 a minor child.” (Passed **2023-07-19; Assigned Act No. 466.**) “Judicial notice shall be taken of
19 the following:... (b) Regulations and legislative enactments issued by or under the authority of
20 the United States or any public entity in the United States. (c) Official acts of the legislative,
21 executive, and judicial departments of the United States and of any state of the United States. ...
22 (h) Facts and propositions that are not reasonably subject to dispute and are capable of immediate
23 and accurate determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code,
24 §§ 452(b), (c), (h).)

25 11. Mississippi House Bill 1125, titled “Regulate Experimental Adolescent
26 Procedures (REAP) Act.” (Passed 2023-01-29; Assigned House Bill No. 1125.) “Judicial notice
27 shall be taken of the following:... (b) Regulations and legislative enactments issued by or under
28 the authority of the United States or any public entity in the United States. (c) Official acts of the
legislative, executive, and judicial departments of the United States and of any state of the United

1 States. ... (h) Facts and propositions that are not reasonably subject to dispute and are capable
2 of immediate and accurate determination by resort to sources of reasonably indisputable
3 accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

4 12. Missouri House Bill 49, titled “Missouri Save Adolescents from Experimentation
5 (SAFE) Act.” (Passed 2023-06-07; Assigned House Bill 49.) “Judicial notice shall be taken of
6 the following:... (b) Regulations and legislative enactments issued by or under the authority of
7 the United States or any public entity in the United States. (c) Official acts of the legislative,
8 executive, and judicial departments of the United States and of any state of the United States. ...
9 (h) Facts and propositions that are not reasonably subject to dispute and are capable of immediate
10 and accurate determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code,
11 §§ 452(b), (c), (h).)

12 13. Montana Senate Bill 99, titled “Youth Health Protection Act.” (Passed **2023-04-**
13 **28; Assigned SB0099.**) “Judicial notice shall be taken of the following:... (b) Regulations and
14 legislative enactments issued by or under the authority of the United States or any public entity
15 in the United States. (c) Official acts of the legislative, executive, and judicial departments of
16 the United States and of any state of the United States. ... (h) Facts and propositions that are not
17 reasonably subject to dispute and are capable of immediate and accurate determination by resort
18 to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

19 14. New Hampshire House Bill 619-FN, titled “An Act to require a person to attain
20 the age of majority for genital gender reassignment surgery.” (Passed 2024-01-04; Assigned
21 House Bill 619-FN.) “Judicial notice shall be taken of the following:... (b) Regulations and
22 legislative enactments issued by or under the authority of the United States or any public entity
23 in the United States. (c) Official acts of the legislative, executive, and judicial departments of
24 the United States and of any state of the United States. ... (h) Facts and propositions that are not
25 reasonably subject to dispute and are capable of immediate and accurate determination by resort
26 to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

27 15. North Carolina House Bill 808, titled “An Act to Prohibit Gender Transition
28 Procedures for Minors.” (Passed **2023-08-16**; Assigned Session Law 2023-11.) “Judicial notice

1 shall be taken of the following:... (b) Regulations and legislative enactments issued by or under
2 the authority of the United States or any public entity in the United States. (c) Official acts of the
3 legislative, executive, and judicial departments of the United States and of any state of the United
4 States. ... (h) Facts and propositions that are not reasonably subject to dispute and are capable
5 of immediate and accurate determination by resort to sources of reasonably indisputable
6 accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

7 16. North Dakota House Bill 1254, titled “Relating to Prohibition of certain practices
8 against a minor; to provide a penalty; and to declare an emergency.” (Passed **2023-04-25**;
9 Assigned House Bill No. 1254.) “Judicial notice shall be taken of the following:... (b)
10 Regulations and legislative enactments issued by or under the authority of the United States or
11 any public entity in the United States. (c) Official acts of the legislative, executive, and judicial
12 departments of the United States and of any state of the United States. ... (h) Facts and
13 propositions that are not reasonably subject to dispute and are capable of immediate and accurate
14 determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b),
15 (c), (h).)

16 17. Nebraska bill LB574, titled “Let Them Grow Act.” (Passed **2023-06-01**;
17 **Assigned Legislative Bill 574**.) “Judicial notice shall be taken of the following:... (b)
18 Regulations and legislative enactments issued by or under the authority of the United States or
19 any public entity in the United States. (c) Official acts of the legislative, executive, and judicial
20 departments of the United States and of any state of the United States. ... (h) Facts and
21 propositions that are not reasonably subject to dispute and are capable of immediate and accurate
22 determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b),
23 (c), (h).)

24 18. Ohio House Bill 68, titled “Saving Adolescents from Experimentation (SAFE)
25 Act.” (Passed **2024-04-24**.) “Judicial notice shall be taken of the following:... (b) Regulations
26 and legislative enactments issued by or under the authority of the United States or any public
27 entity in the United States. (c) Official acts of the legislative, executive, and judicial departments
28 of the United States and of any state of the United States. ... (h) Facts and propositions that are
not reasonably subject to dispute and are capable of immediate and accurate determination by

1 resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

2 19. Oklahoma Senate Bill 613, titled “An Act relating to health care; defining terms;
3 prohibiting gender transition procedures for children.” (Passed **2023-05-01**; Assigned Senate Bill
4 613.) “Judicial notice shall be taken of the following:… (b) Regulations and legislative
5 enactments issued by or under the authority of the United States or any public entity in the United
6 States. (c) Official acts of the legislative, executive, and judicial departments of the United States
7 and of any state of the United States. … (h) Facts and propositions that are not reasonably subject
8 to dispute and are capable of immediate and accurate determination by resort to sources of
9 reasonably indisputable accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

10 20. South Dakota House Bill 1080, titled “An Act to prohibit certain medical and
11 surgical interventions on minor patients.” (Passed 2023-02; Assigned House Bill 1080.) “Judicial
12 notice shall be taken of the following:… (b) Regulations and legislative enactments issued by or
13 under the authority of the United States or any public entity in the United States. (c) Official acts
14 of the legislative, executive, and judicial departments of the United States and of any state of the
15 United States. … (h) Facts and propositions that are not reasonably subject to dispute and are
16 capable of immediate and accurate determination by resort to sources of reasonably indisputable
17 accuracy.” (Ev. Code, §§ 452(b), (c), (h).)

18 21. Tennessee Senate Bill 1, titled “AN ACT to amend Tennessee Code Annotated,
19 Title 28; . . . and Title 71, relative to medical care of the young.” (Passed **2023-03-22**; Assigned
20 Public Chapter No. 1, Senate Bill No. 1.) “Judicial notice shall be taken of the following:… (b)
21 Regulations and legislative enactments issued by or under the authority of the United States or
22 any public entity in the United States. (c) Official acts of the legislative, executive, and judicial
23 departments of the United States and of any state of the United States. … (h) Facts and
24 propositions that are not reasonably subject to dispute and are capable of immediate and accurate
25 determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b),
26 (c), (h).)

27 22. Texas Senate Bill 14, titled “Relating to prohibitions to certain children of
28 procedures and treatments for gender transitioning gender reassignment, or gender dysphoria

1 and on the use of public money or public assistance to provide those procedures and treatments.”
2 (Passed **2023-06-02; Assigned S.B. No. 14.**) “Judicial notice shall be taken of the following:…
3 (b) Regulations and legislative enactments issued by or under the authority of the United States
4 or any public entity in the United States. (c) Official acts of the legislative, executive, and judicial
5 departments of the United States and of any state of the United States. ... (h) Facts and
6 propositions that are not reasonably subject to dispute and are capable of immediate and accurate
7 determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b),
8 (c), (h).)

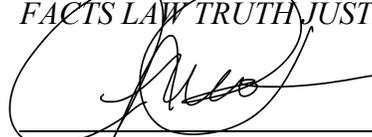
9 23. Utah Senate Bill 16, titled “Transgender Medical Treatments and Procedures.”
10 (Passed **2023-02-01; Assigned S.B. 16.**) “Judicial notice shall be taken of the following:… (b)
11 Regulations and legislative enactments issued by or under the authority of the United States or
12 any public entity in the United States. (c) Official acts of the legislative, executive, and judicial
13 departments of the United States and of any state of the United States. ... (h) Facts and
14 propositions that are not reasonably subject to dispute and are capable of immediate and accurate
15 determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b),
16 (c), (h).)

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1 24. West Virginia Senate Bill 697, titled “A Bill to amend the Code of West Virginia,
2 1931, as amended, by adding thereto a new article, designated §16-2S-1, . . . and §16-2S-8, all
3 relating to prohibiting gender transition surgeries, treatments, and therapies to minors;
4 establishing penalties for practitioners in violation of regulations; safeguarding the mental and
5 physical health of minors; prohibiting political subdivisions from enacting conflicting policies;
6 creating whistleblower protection; prohibiting taxpayer subsidization of gender transition
7 treatments,” introduced January 17, 2024. Judicial notice shall be taken of the following:… (b)
8 Regulations and legislative enactments issued by or under the authority of the United States or
9 any public entity in the United States. (c) Official acts of the legislative, executive, and judicial
10 departments of the United States and of any state of the United States. . . . (h) Facts and
11 propositions that are not reasonably subject to dispute and are capable of immediate and accurate
12 determination by resort to sources of reasonably indisputable accuracy.” (Ev. Code, §§ 452(b),
13 (c), (h).)

14 Dated: February 12, 2024

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