

Filed
Superior Court of California,
Sacramento
02/13/2024
wofmos
By _____, Deputy
24WM000034

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15 Attorneys for Petitioners
16 PROTECT KIDS CALIFORNIA and
17 JONATHAN ZACHRESON

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **COUNTY OF SACRAMENTO**

20 PROTECT KIDS OF CALIFORNIA and
21 JONATHAN ZACHRESON,
22 Individually and on behalf of PROTECT
23 KIDS CALIFORNIA

24 Petitioners,

25 v.

26 ROB BONTA, in his official capacity as
27 Attorney General of California and
28 DOES 1-50, inclusive,

Respondents.

Case No.

**DECLARATION OF C. ERIN FRIDAY
IN SUPPORT OF WRIT PETITION**

Department:
Judge:

Action filed:
Trial date: None set

DECLARATION OF CLARE ERIN FRIDAY

I, C. ERIN FRIDAY, declare as follows:

1. I am an attorney at law licensed to practice in the State of California and am a

BY FAX

1 licensed attorney and of counsel with the Law Offices of Nicole C. Pearson, attorney of record
2 for Petitioners PROTECT KIDS CALIFORNIA and JONATHAN ZACHRESON
3 (“Petitioners”).

4 2. My declaration is submitted in support of the Petitioners’ Writ Petition. I have
5 personal knowledge of the matters set forth below and, if called as a witness, could and would
6 testify competently to them under oath.

7 3. I am a member of the executive committee for the Protect Kids of California Ballot
8 Initiative that has been given the title “RESTRICTS RIGHTS OF TRANSGENDER YOUTH”
9 and designation 23-0027A2 (the “Initiative”).

10 4. To date, 23 states (with a 24th state likely to follow suit) in the nation have passed
11 legislation that safeguards children’s natural bodies, sexual function and ability to procreate. The
12 titles of the acts or laws are all framed in a neutral or in a positive manner – highlighting that the
13 bills are protecting children. *See* Request for Judicial Notice.

14 5. I performed legal research using Casetext. I searched the term “female” in the
15 California Regulations The search engine located 185 Regulations that use the term “female” and
16 they all appear to use the term relative to those persons or animals whose bodies are developed
17 for production of large gametes whether or not eggs are produced.

18 6. I performed legal research using Casetext. I searched the term “female” in the
19 California codes. The search engine located 153 statutes that use the term “female”. The usage
20 of the term “female” in these statutes relate to those humans with biological female bodies whose
21 bodies are developed to produce large gametes, including but not limited to Welfare and
22 Institutions Code §1753.7 [addressing female and menstrual products]; Insurance Code §790.03
23 [referencing life insurance annuities for females as distinguished from males]; the Penal Code
24 §318.6 [addressing exposure of female breasts for crimes related to sexual infractions] and Cal.
25 Pen. Code § 273.4, an act penalizing those for female genital mutilation which means “the
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1 excision or infibulation of the labia majora, labia minora, clitoris, or vulva” body parts only
2 related to females.

3 7. On January 14, 2024, Korey Wells emailed Protect Kids California asking “How
4 do you expect this to have any change to win with a title that says ‘restrict rights? Where is
5 your lawsuit challenging this title? . . . nobody will support something that’s framed as a
6 negative.”

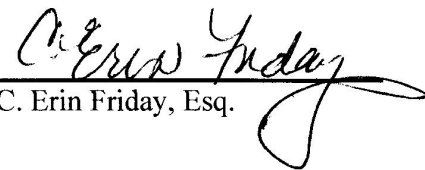
7 8. Exhibit 1 is a true and correct copy of the email from Mr. Wells with his email
8 address redacted.

9 9. I have been gathering signatures to place the Initiative on the California ballot.

10 10. I have had to explain to at least 10 potential signatories what the term
11 “transgender female” means because they are confused as to whether that term means that the
12 person (a) was born female and adopted a male gender identity, or (b) was born male and
13 adopted a female gender identity.

14
15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

17 Executed this 8th day of February 2024, in Redwood City, California

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20 C. Erin Friday, Esq.

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Exhibit 1

From: Korey Wells [REDACTED]
Sent: Sunday, January 14, 2024 10:12 PM
To: Protect Kids CA <info@protectkidsca.com>
Subject: Petition title & description

How do you expect this to have any chance to win with a title that says "restrict rights"?

Where are your lawsuits challenging this title?

From Julius Caesar to the Modern Era it has been demonstrated that awarding more "rights" has been a steadfast way to win political support. Your initiative is to enfranchise & Protect the rights of Women- nobody will support something that's framed as a negative.

If you don't challenge the title I will assume this is just a DNC plot to gather names of opposition.