

1 BRIAN R. SCIACCA, ESQ. State Bar Number 235045
brian@ieplaw.com
2 Brian R. Sciacca
3 Attorney at Law
4 31787 5th Avenue
5 Laguna Beach, CA 92651
6 Ph: (949) 516-0633
brian@ieplaw.com

7 Attorney for Plaintiff Natalie Ryan

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9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**
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12 NATALIE RYAN,)
13) **Case Number:**
14 Plaintiff,)
15 vs.) **COMPLAINT FOR DAMAGES**
16) 1. UNRUH CIVIL RIGHTS ACT
PROFESSIONAL DISC GOLF) (CAL. CIV. CODE § 51)
17 ASSOCIATION, DISC GOLF USA,) 2. UNFAIR COMPETITON (CAL.
LLC, dba DISC GOLF PRO TOUR,) BUS. & PROF. CODE § 17200 *et.*
18 and 1000 RATED PRODUCTIONS,) *seq.*)
19) 3. INTENTIONAL
Defendants.) INTERFERENCE WITH
20) PROSPECTIVE ECONOMIC
21) ADVANTAGE
22) **DEMAND FOR JURY TRIAL**
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24 Plaintiff NATALIE RYAN alleges as follows:

25 **INTRODUCTION**

26 1. Plaintiff is a female professional disc golfer who is transgender. She is
27 member of the Professional Disc Golf Association (“PDGA”) and was a
28 competitor in the female professional open division on the Disc Golf Pro Tour in

1 2022, where she garnered two “Elite Series” victories and finished the tour ranked
2 in the top ten, qualifying to compete on the Tour again in 2023. In November of
3 2022, the Professional Disc Golf Association adopted a rule requiring any
4 transgender woman to have undergone gender-affirming treatment before the age
5 of 12 years-old in order to compete in the female professional open divisions of its
6 elite events. The Disc Golf Pro Tour (“DGPT”) simultaneously adopted the same
7 criteria for participation in the female professional open division of all its events.
8 Because Plaintiff did not have gender-affirming treatment prior to her 12th
9 birthday, she has now been deemed ineligible to participate in the female
10 professional open division of DGPT events by the PDGA and DGPT. Plaintiff
11 alleges that the policy adopted by the PDGA and DGPT is arbitrary and capricious
12 and in violation of Plaintiff’s right to be free from discrimination based on her
13 gender.

14 **JURISDICTION AND VENUE**

15 2. Plaintiff NATALIE RYAN (“Plaintiff”) is a female citizen of the state
16 of Virginia.

17 3. Defendant PROFESSIONAL DISC GOLF ASSOCIATION (“PDGA”) is a Colorado nonprofit corporation headquartered in Appling, Georgia. According
18 to its Articles of Incorporation, the purpose of the PDGA is the “promotion and
19 governance of the sport of disc golf.” The PDGA sanctions professional and
20 amateur disc golf tournaments in California, including the OTB Open presented by
21 MVP Disc Sports, scheduled to take place May 12-14, 2023, in Stockton,
22 California (“OTB Open”).

23 4. Defendant DISC GOLF USA, LLC is a Delaware Corporation
24 headquartered in Jeffersonville, Vermont and doing business as Disc Golf Pro Tour
25 (“DGPT”). The DGPT is “The Official Pro Tour of the PDGA.” The OTB Open is
26 an “elite series” event on the 2023 Disc Golf Pro Tour.
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1 5. Defendant 1000 Rated Productions is a disc golf events corporation
2 incorporated in California and headquartered in San Francisco, California and is
3 the administrator of the OTB Open.

4 6. Jurisdiction in the U.S. District Court of the Eastern District of
5 California is proper pursuant to 28 U.S.C. § 1332, Federal Diversity Jurisdiction in
6 that Plaintiff is a citizen of Virginia, Defendant PDGA is incorporated in Colorado,
7 with its principal place of business in Appling, Georgia, Defendant DGPT is
8 incorporated in Delaware, with its principal place of business in Jeffersonville,
9 Vermont, Defendant 1000 Rated Productions is incorporated and headquartered in
10 California.

11 7. The amount in controversy exceeds \$75,000 exclusive of interests and
12 costs.

13 8. Venue is proper in this court under 20 U.S.C. § 1367 as the action
14 arises from conduct which occurs in Stockton, San Joaquin County.

15 **PARTIES TO THE CIVIL ACTION**

16 9. Plaintiff is informed and believes and, on that basis, alleges that each
17 of the named Defendants is legally responsible in some manner for the occurrences
18 herein alleged and that the injuries herein alleged were caused by the acts and/or
19 omissions of such Defendants.

20 10. Plaintiff herein alleges that the Defendants, and each of them, did
21 conspire together and/or aid and abet the others to violate Plaintiff's rights as
22 alleged herein.

23 11. Plaintiff is informed and believes and, on that basis, alleges that there
24 exists, and at all times relevant to this Complaint, existed, a unity of interests
25 between certain of the Defendants, such that any individuality and separateness
26 between these certain Defendants are the alter ego of other Defendants and each
27 exerted control over the other(s). Adherence to the fiction of the separate existence
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1 of these certain Defendants as entities distinct from other certain Defendants will
2 permit an abuse of the corporate privilege and would sanction fraud and/or
3 promote injustice.

4 **FACTS COMMON TO ALL CAUSES OF ACTION**

5 12. Plaintiff is a transgender woman, and as such, is within a class of
6 persons protected by the Unruh Act based on gender. Plaintiff has felt like a female
7 since birth and in January of 2018 had gender-affirming surgery. Plaintiff is
8 recognized under California law as a woman.

9 13. Plaintiff is a member of the PDGA and has been so since 2018. At all
10 times, she has been registered as a woman. She is assigned PDGA number 114560.

11 14. Plaintiff first competed in PDGA-sanctioned disc golf tournaments in
12 March of 2019. Since then, she has competed in 61 PDGA-sanctioned
13 tournaments. In 60 of those tournaments, she competed in a female-protected
14 division. The only exception came at a single “C-tier” event that offered no female
15 protected divisions.

16 15. In 2021, Plaintiff competed in five DGPT National Tour events in the
17 Female Professional Open (“FPO”) division. Her average finish was 16th place and
18 she earned a total of \$1653.00 in prize money. She also placed second in a DGPT
19 Silver Series event, earning \$750.00.

20 16. In 2022, Plaintiff competed in the FPO division of 13 DGPT Elite
21 Series events. She won two events, had four top-ten finishes, and earned
22 \$19,360.00 in prize money, while finishing the tour as the ninth-rated player in the
23 FPO division. She earned a “tour card” for 2023, entitling her to early and
24 automatic registration into all DGPT events in 2023 and other associated benefits
25 for which she paid \$5077.00.

26 17. In December of 2022, as a direct response to Plaintiff’s success on the
27 DGPT, the PDGA adopted new rules regarding the eligibility of transgender
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1 women to participate in the FPO division in 2023. The new policy bans any
2 transgender woman from competing in the FPO division of its major professional
3 events unless they have undergone gender-affirming treatment prior to the age of
4 12. At the time of its decision, the PDGA knew that Plaintiff would be ineligible to
5 compete under such guidelines. At the same time, the PDGA adopted an alternate
6 policy for non-elite female-protected divisions based upon a minimum length of
7 gender-affirming treatment and maximum blood levels of testosterone. The PDGA
8 left the “Official Pro Tour of the PDGA” to decide for itself which policy to adopt.

9 18. The DGPT immediately announced that it would adopt the policy
10 banning any transgender woman from competing in its events unless they have
11 undergone gender-affirming treatment prior to the age of 12. At the time of its
12 decision, the DGPT knew that Plaintiff would be ineligible to compete under such
13 guidelines.

14 19. On January 24, 2023, the PDGA sent an email to Plaintiff indicating
15 that Plaintiff is not eligible to participate in DGPT events and directing Plaintiff to
16 complete a “gender eligibility verification” form.

17 20. On February 7, 2023, the DGPT sent an email to Plaintiff notifying
18 her that the PDGA had informed it that Plaintiff was ineligible for the FPO
19 division at DGPT events for the 2023 season, even though she had qualified for a
20 tour card by her performance in 2023.

21 **Claims Against the PDGA**

22 21. PDGA is a business establishment for the purposes of the Unruh Civil
23 Rights Act, Cal. Civ. Code § 51.

24 22. PDGA is responsible for establishing eligibility criteria for the
25 tournaments it sanctions and providing such eligibility determinations to
26 tournament directors.

1 23. PDGA has established discriminatory guidelines for the participation
2 of transgender women, including Plaintiff, in the FPO division of professional
3 major events and DGPT events by requiring that transgender women undergo
4 gender-affirming treatment prior to the age of 12 in order to compete in said
5 events.

6 24. Plaintiff's inability to compete in the FPO division of professional
7 major and DGPT events sanctioned by the PDGA has limited her professional disc
8 golf career.

9 25. PDGA's policy of requiring its transgender women members to
10 undergo gender-affirming treatment prior to the age of 12 in order to compete in
11 the FPO division of its professional major and DGPT events has denied Plaintiff
12 and other transgender women, who in the eyes of California law are women, full
13 and equal access to the accommodations, advantages, facilities, privileges, and/or
14 services of Defendant's organizations.

15 26. PDGA acted intentionally to discriminate as a business establishment
16 in violation of the Unruh Civil Rights Act, Cal. Civ. Code § 51. Plaintiff is
17 informed and believes, and thereupon alleges, that PDGA and/or its employees
18 sought to preclude Plaintiff from access to competition in the FPO division of
19 professional major and DGPT events and the associated attendant
20 accommodations, advantages, facilities, privileges, and services because of her
21 gender as a transgender woman. Plaintiff is further informed and believes, and
22 thereupon alleges, that the exclusion of transgender women from competition in
23 the FPO division of professional major and DGPT events and the associated
24 attendant accommodations, advantages, facilities, privileges, and services is the
25 policy of the PDGA.
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1 27. Plaintiff suffered damages that include economic losses, mental
2 suffering, emotional distress, grief, anxiety, humiliation, shock, indignity, and
3 embarrassment.

4 **Claims Against the DGPT**

5 28. DGPT is a business establishment for the purposes of the Unruh Civil
6 Rights Act, Cal. Civ. Code § 51.

7 29. In 2021 and 2022 DGPT had no rule that transgender women must
8 undergo gender-affirming treatment prior to the age of 12 in order to compete in its
9 FPO division. Thus, Plaintiff was eligible to compete and did compete in the FPO
10 division of DGPT events in 2021 and 2022, and qualified to compete in 2023
11 before DGPT adopted the policy at issue.

12 30. DGPT has established discriminatory guidelines for the participation
13 of transgender women, including Plaintiff, in the FPO division of DGPT events by
14 requiring that transgender women undergo gender-affirming treatment prior to the
15 age of 12 in order to compete in said events.

16 31. Plaintiff's inability to compete in the FPO division of DGPT events
17 has limited her professional disc golf career.

18 32. DGPT's policy of requiring its transgender women members to
19 undergo gender-affirming treatment prior to the age of 12 in order to compete in
20 the FPO division of its events has denied Plaintiff and other transgender women,
21 who in the eyes of California law are women, full and equal access to the
22 accommodations, advantages, facilities, privileges, and/or services of Defendant's
23 organizations.

24 33. DGPT acted intentionally to discriminate as a business establishment
25 in violation of the Unruh Civil Rights Act, Cal. Civ. Code § 51. Plaintiff is
26 informed and believes, and thereupon alleges, that DGPT and/or its employees
27 sought to preclude Plaintiff from access to competition in the FPO division of
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1 DGPT events and the associated attendant accommodations, advantages, facilities,
2 privileges, and services because of her gender as a transgender woman. Plaintiff is
3 further informed and believes, and thereupon alleges, that the exclusion of
4 transgender women from competition in the FPO division of DGPT events and the
5 associated attendant accommodations, advantages, facilities, privileges, and
6 services is the policy of the DGPT.

7 34. Plaintiff suffered damages that include economic losses, mental
8 suffering, emotional distress, grief, anxiety, humiliation, shock, indignity, and
9 embarrassment.

10 **CLAIMS FOR RELIEF**

11 -COUNT ONE-

12 *Violations of the Unruh Civil Rights Act*

13 (Cal. Civ. Code § 51)

14 (Against All Defendants)

15 35. Plaintiff incorporates by reference the allegations contained in the
16 paragraphs above as though fully set forth herein.

17 **PDGA**

18 36. Plaintiff was subjected to the above-referenced conduct, including but
19 not limited to discrimination on the basis of gender by the PDGA.

20 37. Plaintiff is informed and believes, and thereupon alleges, that she was
21 targeted for discrimination on the basis of gender because she is a woman who did
22 not receive gender-affirming treatment before the age of 12.

23 38. At all times relevant, PDGA has had an explicit policy of requiring
24 transgender women to have undergone gender-affirming treatment before the age
25 of 12 in order to compete in the FPO division of its professional major and DGPT
26 events. This policy has denied Plaintiff and other transgender women from equal
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1 access to the accommodations, advantages, facilities, privileges, and/or services of
2 Defendant's business.

3 39. As a direct and proximate result of PDGA's unlawful conduct,
4 Plaintiff has suffered special damages to be proven at time of trial.

5 40. As a direct and proximate result of PDGA's unlawful conduct,
6 Plaintiff has suffered general damages including but not limited to shame,
7 humiliation, mental suffering, shock, embarrassment, intimidation, inconvenience,
8 physical distress and injury, fear, stress, and other damages to be proven at trial,
9 including loss of income and endorsements.

10 41. Plaintiff is informed and believes, and thereupon alleges, that PDGA
11 committed the acts herein alleged maliciously and oppressively in conscious
12 disregard for Plaintiff's rights. Accordingly, Plaintiff is entitled to recover punitive
13 damages according to proof.

14 42. As a result of the conduct of PDGA, Plaintiff was forced to retain an
15 attorney in order to protect her rights. Accordingly, Plaintiff seeks reasonable
16 attorney's fees incurred in this litigation in an amount according to proof at trial
17 and other relief as requested in Plaintiff's prayer for relief below.

18 43. Plaintiff requests an injunction against PDGA to prohibit it from
19 conducting business activity in California as long as it continues to violate the
20 rights of Plaintiff and other transgender women.

21 44. Plaintiff requests an injunction allowing Plaintiff to compete in the
22 FPO division of the OTB Open in Stockton California in May of 2023.

23 **DGPT**

24 45. Plaintiff was subjected to the above-referenced conduct, including but
25 not limited to discrimination on the basis of gender by the DGPT.
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1 46. Plaintiff is informed and believes, and thereupon alleges, that she was
2 targeted for discrimination on the basis of gender because she is a woman who did
3 not receive gender-affirming treatment before the age of 12.

4 47. Because of Plaintiff's success on the DGPT in 2022. DGPT
5 deliberately changed its policy so as to exclude Plaintiff and other transgender
6 women from competition in the FPO division by requiring that transgender women
7 undergo gender affirming treatment prior to the age of 12 in order to compete. This
8 policy has denied Plaintiff and other transgender women from equal access to the
9 accommodations, advantages, facilities, privileges, and/or services of Defendant's
10 business.

11 48. As a direct and proximate result of DGPT's unlawful conduct,
12 Plaintiff has suffered special damages to be proven at time of trial.

13 49. As a direct and proximate result of DGPT's unlawful conduct,
14 Plaintiff has suffered general damages including but not limited to shame,
15 humiliation, mental suffering, shock, embarrassment, intimidation, inconvenience,
16 physical distress and injury, fear, stress, and other damages to be proven at trial,
17 including loss of income and endorsements.

18 50. Plaintiff is informed and believes, and thereupon alleges, that DGPT
19 committed the acts herein alleged maliciously and oppressively in conscious
20 disregard for Plaintiff's rights. Accordingly, Plaintiff is entitled to recover punitive
21 damages according to proof.

22 51. As a result of the conduct of DGPT, Plaintiff was forced to retain an
23 attorney in order to protect her rights. Accordingly, Plaintiff seeks reasonable
24 attorney's fees incurred in this litigation in an amount according to proof at trial
25 and other relief as requested in Plaintiff's prayer for relief below.
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1 52. Plaintiff requests an injunction against DGPT to prohibit it from
2 conducting business activity in California as long as it continues to violate the
3 rights of Plaintiff and other transgender women.

4 53. Plaintiff requests an injunction allowing Plaintiff to compete in the
5 FPO division of the OTB Open in Stockton California in May of 2023.

6 WHEREFORE. Plaintiff prays for the relief as set forth below.

7 -COUNT TWO-

8 *Unfair Competition*

9 (Cal. Bus. & Prof. Code § 17200 *et. seq.*)

10 (Against All Defendants)

11 54. Plaintiff incorporates by reference the allegations contained in the
12 paragraphs above as though fully set forth herein.

13 **PDGA**

14 55. The PDGA has engaged in unfair business acts and practices,
15 including unlawful discrimination, as set forth above.

16 56. At all times relevant, PDGA has had an explicit policy of requiring
17 transgender women to have undergone gender-affirming treatment before the age
18 of 12 in order to compete in the FPO division of its professional major and DGPT
19 events. This policy has denied Plaintiff and other transgender women from equal
20 access to the accommodations, advantages, facilities, privileges, and/or services of
21 Defendant's business.

22 57. By engaging in these acts and practices, as set forth above, PDGA
23 committed one or more acts of unfair competition within the meaning of Section
24 17200.

25 58. The conduct of the PDGA was unlawful under Section 17200 as it
26 included business acts and practices that are discriminatory in violation of the
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1 Unruh Civil Rights Act, the California Constitution, and well-established public
2 policy.

3 59. The conduct of the PDGA as outlined above was unfair within the
4 meaning of Section 17200 because it was against established public policy and was
5 pursued to attain an unjustified monetary advantage for the PDGA at the expense
6 of the privacy, reputation, business, and occupation of Plaintiff. As such, the
7 business practices and acts of the PDGA have been immoral, unethical, oppressive,
8 and unscrupulous.

9 60. The injury to Plaintiff caused by the conduct of the PDGA is far
10 greater than any countervailing benefit.

11 61. By and through the unfair and unlawful business practices and acts
12 described herein, the PDGA have benefitted from discrimination against Plaintiff
13 and other transgender women and have deprived Plaintiff and others of valuable
14 rights and benefits guaranteed by law, all to Plaintiff's detriment.

15 62. As a result of the unlawful actions of the PDGA, Plaintiff has suffered
16 injury in fact and actual, general, and special damages, including but not limited to
17 harm to her business, occupation, and reputation.

18 63. Plaintiff is seeking an injunction enjoining the PDGA from engaging
19 in these unlawful acts.

20 64. Plaintiff seeks an order of this Court against the PDGA awarding
21 restitution, disgorgement, injunctive relief and all other relief allowed under
22 Section 17200, including interest and attorney's fees and costs pursuant to
23 California Code of Civil Procedure §§ 1021.5 and 1032.

24 **DGPT**

25 65. The DGPT has engaged in unfair business acts and practices,
26 including unlawful discrimination, as set forth above.
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1 66. At all times relevant, DGPT has had an explicit policy of requiring
2 transgender women to have undergone gender-affirming treatment before the age
3 of 12 in order to compete in the FPO division of DGPT events. This policy has
4 denied Plaintiff and other transgender women from equal access to the
5 accommodations, advantages, facilities, privileges, and/or services of Defendant's
6 business.

7 67. By engaging in these acts and practices, as set forth above, DGPT
8 committed one or more acts of unfair competition within the meaning of Section
9 17200.

10 68. The conduct of the DGPT was unlawful under Section 17200 as it
11 included business acts and practices that are discriminatory in violation of the
12 Unruh Civil Rights Act, the California Constitution, and well-established public
13 policy.

14 69. The conduct of the DGPT as outlined above was unfair within the
15 meaning of Section 17200 because it was against established public policy and was
16 pursued to attain an unjustified monetary advantage for the DGPT at the expense
17 of the privacy, reputation, business, and occupation of Plaintiff. As such, the
18 business practices and acts of the DGPT have been immoral, unethical, oppressive,
19 and unscrupulous.

20 70. The injury to Plaintiff caused by the conduct of the DGPT is far
21 greater than any countervailing benefit.

22 71. By and through the unfair and unlawful business practices and acts
23 described herein, the DGPT have benefitted from discrimination against Plaintiff
24 and other transgender women and have deprived Plaintiff and others of valuable
25 rights and benefits guaranteed by law, all to Plaintiff's detriment.
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1 72. As a result of the unlawful actions of the DGPT, Plaintiff has suffered
2 injury in fact and actual, general, and special damages, including but not limited to
3 harm to her business, occupation, and reputation.

4 73. Plaintiff is seeking an injunction enjoining the DGPT from engaging
5 in these unlawful acts.

6 74. Plaintiff seeks an order of this Court against the DGPT awarding
7 restitution, disgorgement, injunctive relief and all other relief allowed under
8 Section 17200, including interest and attorney's fees and costs pursuant to
9 California Code of Civil Procedure §§ 1021.5 and 1032.

10 WHEREFORE. Plaintiff prays for the relief as set forth below.

11 -COUNT THREE-

12 *Intentional Interference with Prospective Economic Advantage*

13 75. Plaintiff incorporates by reference the allegations contained in the
14 paragraphs above as though fully set forth herein.

15 **DGPT**

16 76. Plaintiff had a prospective economic benefit as one of the top ten
17 female professional disc golfers in the world which included, *inter alia*, the
18 probability of future economic benefit from winning and/or performing well at
19 DGPT events, bonuses from sponsors and additional endorsements from future
20 sponsors.

21 77. Plaintiff is sponsored by certain entities and is entitled to bonuses
22 from those entities for performance in DGPT events. Plaintiff was also engaged in
23 negotiations with prospective sponsors prior to the commencement of the 2023
24 season.

25 78. DGPT had knowledge that Plaintiff was sponsored by certain entities
26 and entitled to bonuses for performance in DGPT events. DGPT also had
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1 knowledge that Plaintiff was engaged in negotiations with prospective sponsors
2 prior to the commencement of the 2023 season.

3 79. DGPT's intentional act of excluding Plaintiff from competing in the
4 FPO division of DGPT tournaments were designed to disrupt Plaintiff's economic
5 relationship with her sponsors and prospective sponsors. The change in eligibility
6 requirements was an independent wrong committed by the DGPT, which was in
7 violation of the Unruh Act and unfair competition laws.

8 80. As a result of DGPT's actions Plaintiff lost her ability to compete in
9 the FPO division of DGPT events, Plaintiff lost her ability to earn performance
10 bonuses from her sponsors. In addition, all entities with whom Plaintiff was
11 negotiating sponsorships for the 2023 season withdrew from negotiations
12 following DGPT's adoption of its new discriminatory policy. This caused an actual
13 disruption in Plaintiff's relationship with certain entities that sponsored, or were
14 interested in sponsoring, Plaintiff's career as a professional disc golfer.

15 81. Plaintiff lost her ability to earn bonuses from her sponsors and lost
16 prospective sponsorship opportunities, causing economic loss. Such economic loss
17 was proximately caused by DGPT.

18 82. The conduct of DGPT was malicious and oppressive as defined under
19 California Civil Code § 3294, and, as such, warrants the imposition of punitive
20 damages against them, in an amount to be determined at time of trial.

21 WHEREFORE. Plaintiff prays for the relief as set forth below.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiffs prays that process be issued and judgment be entered
24 against Defendants, and each of them, as follows:

25 **For the First Cause of Action:**

- 26 a. Special damages in a sum according to proof against all Defendants;
27 b. General damages in a sum according to proof against all Defendants;
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- c. Statutory damages of a maximum of three times the amount of actual damages or a minimum of \$4000.00;
- d. For interest provided by law including, but not limited to, California Civil Code § 3291 against all Defendants;
- e. For attorney's fees as allowed by law against all Defendants;
- f. Costs of suit and for other such and further relief as the court deems proper against all Defendants;
- g. For civil penalty provided by law including, but not limited to, that provided by California Civil Code § 52 against all Defendants;
- h. For punitive damages against all Defendants;
- i. A permanent injunction against PDGA and DGPT enjoining them from denying transgender women from competing in the FPO division of disc golf tournaments and from doing business in California so long as they continue to violate California law and the rights of transgender women;
- j. A declaratory judgment that the Unruh Civil Rights Act, Cal. Civ. Code § 51 applies to Defendants and that Defendant's actions violated the Act;
- k. Costs of suit incurred herein; and
- l. For other and further relief as the Court deems proper.

For the Second Cause of Action:

- a. Special damages in a sum according to proof against all Defendants;
- b. General damages in a sum according to proof against all Defendants;
- c. For costs of suit;
- d. For restitution, disgorgement, injunctive relief and all other relief allowed under § 17200, including interest and attorney's fees and costs;

- e. A permanent injunction against PDGA and DGPT enjoining them from denying transgender women from competing in the FPO division of disc golf tournaments and from doing business in California so long as they continue to violate California law and the rights of transgender women;
- f. For pre-judgment and post-judgment interest at the legal rate; and
- g. For other and further relief as the Court deems proper.

For the Third Cause of Action:

- a. Special damages in a sum according to proof against DGPT;
- b. General damages in a sum according to proof against DGPT;
- c. For costs of suit;
- d. For punitive damages in an amount to be determined at trial;
- e. For pre-judgment and post-judgment interest at the legal rate; and
- f. For other and further relief as the Court deems proper.

DATED: February 22, 2023

/s/Brian R. Sciacca
Brian R. Sciacca
Attorney at Law

Attorney for Plaintiff
Natalie Ryan