

IN THE NEBRASKA ACCOUNTABILITY AND DISCLOSURE COMMISSION

IN RE: SENATOR MEGAN HUNT,)

#23-11

RECEIVED

Respondent.)

COMPLAINT

MAR 24 2023

NEBRASKA ACCOUNTABILITY

and
DISCLOSURE COMMISSION

COMES NOW, David D. Begley, Petitioner, and for his Complaint against Senator Megan Hunt, states and alleges as follows:

1. I am a Nebraska attorney, resident, citizen, and voter.
2. On January 17, 2023, LB 574 was introduced in the Unicameral and filed with the Clerk of the Legislature. If enacted into law, LB 574 (the Let Them Grow Act) would prohibit any minor child from obtaining gender altering medical services in Nebraska from a licensed health care practitioner. LB 574, §5.
3. On March 22, 2023, Senator Megan Hunt stated on the floor of the Unicameral that her minor child, who was born female, was transitioning genders. In order to fully transition, Senator Hunt's child would need medical services. The medical services, according to Senator Hunt, would cost \$7,000 per month if there was no health insurance coverage.
4. On March 22, 2023, on the floor of the Unicameral, Senator Hunt said that her minor child's health insurance was provided by Medicaid which is administered by the Nebraska Department of Health and Human Services. Furthermore, that her minor child's application for gender transition medical services had been rejected four times.
5. Senator Hunt's minor child is a member of her immediate family as defined in Neb. Rev. Stat. §49-1425.
6. At all times relevant herein, Senator Hunt had a potential conflict with respect to LB 574.
7. On March 23, 2023, Senator Hunt debated and voted "no" on LB 574.
8. At no time prior to March 23, 2023, did Senator Hunt deliver and file with the Speaker of the Legislature or the Commission the written statement required by Neb. Rev. Stat. §49-1499(a) and (b).

9. Currently, twenty-five states and the District of Columbia extend Medicaid coverage for sex change or gender transition medical services. *Medicaid Coverage for Gender-Affirming Care*, UCLA School of Law, The Williams Institute (2022).

<https://williamsinstitute.law.ucla.edu/wp-content/uploads/Medicaid-Gender-Care-Dec-2022.pdf>

10. Nebraska does not extend Medicaid coverage for sex changes. 471 NAC 18 §006.01(DD).

11. In my legal opinion, and per the case and statutory citations set out in the study prepared by The Williams Institute *supra*, Senator Hunt and her minor child have a slightly more than average chance of obtaining Nebraska Medicaid coverage for the child's gender transition medical services via a lawsuit if LB 574 does not become law.

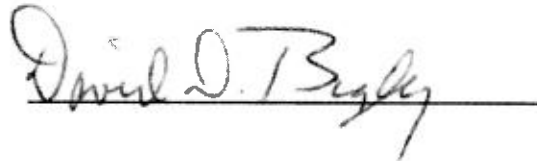
12. If LB 574 does not become law, then Senator Hunt's immediate family member could receive a financial benefit with Medicaid paying for the medical services necessary to transition genders.

13. Senator Hunt has the burden of proving that she is excepted from the provisions of Neb. Rev. Stat. §49-1499 because LB 574 would apply to "a broad segment of the public."

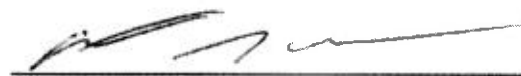
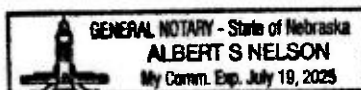
WHEREFORE, Petitioner prays that the Commission, per Neb. Rev. Stat. §49-14,126, impose such penalty on the Respondent as is allowed by law.

DATED this 23rd day of March, 2023.

DAVID D. BEGLEY, Petitioner



SUBSCRIBED AND SWORN to before me this 23rd day of March, 2023.


Notary Public