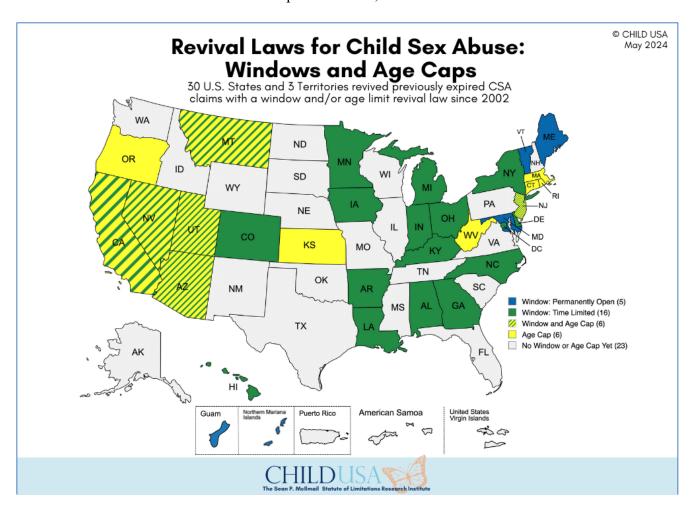


Revival Laws for Child Sex Abuse

30 U.S. States & Territories Revived Previously Expired Child Sex Abuse Claims with a Window and/or Age Limit Revival Law

Alice Nasar Hanan, Esq. Updated June 6, 2024



CHILD USA and CHILD USAdvocacy are leading the vibrant national and global movement to eliminate civil and criminal SOLs and revive expired civil claims as a systemic solution to the preventable CSA epidemic.





I. What Are Revival Laws and Why Do We Need Them?

It is a medical fact that victims of child sex abuse often need decades to come forward. They are traumatized from the abuse, incapable of processing what happened to them, and often dependent on the adults who perpetrated or caused the abuse. In a study of survivors of abuse in Boy Scouts of America, 51% of survivors disclosed their abuse for the first time at age 50 or older. One-third of CSA survivors never tell anyone they were abused. By the time many victims are ready to come forward, the courthouse doors are locked because the statutes of limitations (SOL) for claims expired. Revival laws honor and empower the victims of child sex abuse who faced locked courthouse doors due to unfairly short SOLs.

There is only one way to restore justice to adult victims of child sex abuse whose civil and criminal SOLs have expired, and that is to revive their civil claims. This is because the U.S. Constitution prohibits revival of criminal prosecutions, but allows revival of civil causes of action. Revival laws are not solely about justice for victims; there are also important public safety reasons for allowing older claims of abuse to proceed. When victims are empowered to disclose their abuse and sue for their injuries, the public benefits in many ways. Revival laws serve three compelling purposes: (1) they help identify hidden child predators and institutions that endanger children to the public, shielding other children from future abuse; (2) they shift the cost of the abuse from the victims and taxpayers to those who caused it; and (3) they educate the public about the prevalence, signs, and impact of child sex abuse so that it can be prevented in the future.

HOW REVIVAL LAWS HELP EVERYONE



Identifies Hidden Child Predators and the Institutions that Endanger Children

to the public, shielding other children from future abuse.



Punishes Bad Actors & Shifts the Cost of Abuse

from the victims and taxpayers to those who caused it.



Prevents Further Abuse

by educating the public about the prevalence, signs, and impact of child sex abuse so that it can be prevented in the future.



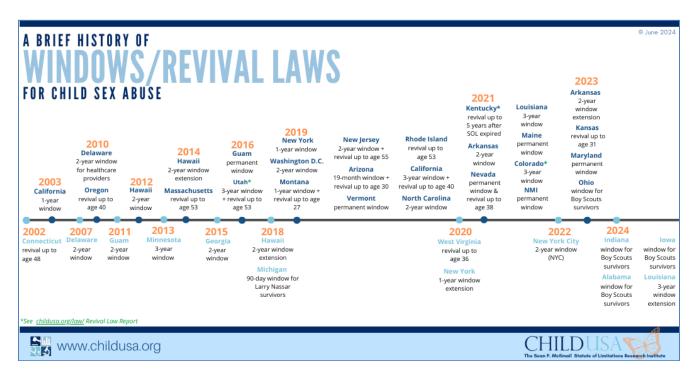
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II. State-by-State Overview of All Revival Laws Since 2002

A timeline of all CSA revival laws enacted since 2002 is provided in the graphic below.



A full list of the CSA revival laws in 33 U.S. States and Territories (30 States + 3 Territories) is provided in the following chart.*

State	Revival Law Type	Window Dates	Age Limit	Revival Law Description
Alabama	1+ Year Window (2024)	Open 4/3/24-1/31/26		1-year and 10-month window for expired claims against the Boy Scouts of America bankruptcy estate opened on April 3, 2024. ¹
Arizona	1.5-Year Window & Age 30 Limit (2019)	Closed 5/27/19- 12/30/20	Age 30	Permanently revived claims up to age 30 and 1.5-year window for expired claims against all types of defendants closed on December 30, 2020. ²
Arkansas	2-Year Window (2023)	Open 2/1/24-1/31/26		2-year window for expired claims against all types of defendants opened on February 1, 2024, and closes on January 31, 2026. ³
	1.5-Year Window (2021)	Closed 2/1/22- 7/31/23		1.5-year window for expired claims against all types of defendants opened on February 1, 2022, and closed on July 31, 2023. The window was set to be open for 2 years, but the later window statute shortened it, creating a 6-month gap period between windows.

^{*} This list does not include revival via delayed discovery rule or criminal conviction revival provisions.



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California	3-Year Window & Age 40 Limit (2019)	Closed 1/1/20- 12/31/22	Age 40	Permanently revived claims up to age 40 and 3-year window for expired claims against all types of defendants closed on December 31, 2022. ⁵
	1-Year Window (2004)	Closed 1/1/05- 12/31/05		1-year window for expired claims against perpetrators who were being criminally prosecuted under California Penal Code § 803(g)'s criminal SOL revival provision, but whose criminal case was overturned as a result of U.S. Supreme Court ruling in <i>Stogner</i> . ⁶
	1-Year Window (2003)	Closed 1/1/03- 12/31/03		1-year window for expired claims against private organizations and non-perpetrator individuals only closed on December 31, 2003. ⁷
Colorado*	3-Year Window (2021)	Closed 1/1/22- 12/31/24		3-year window for claims against perpetrators, private organizations, and government for abuse from 1960-2021 opened on January 1, 2022. In 2023, the window was held unconstitutional. ⁸ *The law is not a revival law—it is a new cause of action—but it is included because it opened a window to justice for many survivors whose common law claims were expired. ⁹
Connecticut	Age 48 Limit (2002)		Age 48	Permanently revived claims up to age 48 against all types of defendants. ¹⁰
Delaware	2-Year Window (2010)	Closed 7/13/10- 7/12/12		2-year window for expired claims against healthcare providers was added in 2010 because original window did not apply to them. ¹¹
	2-Year Window (2007)	Closed 7/10/07- 7/9/09		2-year window for expired claims against all types of defendants closed on July 9, 2009. ¹²
Georgia	2-Year Window (2015)	Closed 7/1/15- 6/30/17		2-year window for expired claims against perpetrators only closed on June 30, 2017. ¹³
Guam	Permanent Window (2016)	Open 9/23/16- never closes	No age limit	Permanently open revival window for all expired claims against all types of defendants opened on September 23, 2016. ¹⁴
	2-Year Window (2011)	Closed 3/9/11- 3/8/13		2-year window for expired claims against abusers only closed on March 8, 2013. ¹⁵
Hawaii	2-Year Window (2018)	Closed 4/24/18- 4/23/20		2-year window for expired claims against all types of defendants closed on April 23, 2020. ¹⁶



Indiana Iowa	2-Year Window (2014) 2-Year Window (2012) 1+ Year Window (2024) 1+ Year Window (2024)	Closed 4/24/14- 4/23/16 Closed 4/24/12- 4/23/14 Open 3/12/24- 7/1/25 Open 4/19/24-		In 2014 original window was extended for another 2 years and expanded to include claims against the government. ¹⁷ 2-year window for expired claims against perpetrators, other individuals, and private organizations closed on April 24, 2014. ¹⁸ 1-year and 3-month window for expired claims against the Boy Scouts of America bankruptcy estate opened on March 12, 2024. ¹⁹ 1-year and 9-month window for expired claims against the Boy Scouts of America bankruptcy
Kansas	Age 31 Limit	12/31/26	Age 31	estate opened on April 19, 2024. ²⁰ Revives SOL up to age 31 or 3 years after criminal conviction. ²¹
Kentucky	Limited Window (2021)	Closed 5 years after SOL expired		Limited window reviving expired claims for up to 5 years after the date the SOL previously expired opened on March 23, 2021. ²² The revival was held unconstitutional. ²³
Louisiana	2+ Year Window	Opening soon 8/14/24-6/13/27		Nearly 3-year window extension will open on August 1, 2024. ²⁴
	3-Year Window (2021)	Open 6/14/21 – 6/13/24		3-year window for expired claims against all types of defendants opened on June 14, 2021. ²⁵
Maine	Permanent Window (2021)	Open 10/28/21- never closes	No age limit	Permanently open revival window for all expired claims against all types of defendants opened on October 18, 2021. Sovereign immunity laws still block window claims against the state. ²⁶
Maryland	Permanent Window (2023)	Open 10/1/23- never closes	No age limit	Permanently open revival window for all expired claims against all types of defendants opened on October 1, 2023. ²⁷
Mass.	Age 53 Limit (2014)		Age 53	Permanently revived claims up to age 53 against perpetrators only. ²⁸
Michigan	90-Day Window (2018)	Closed 6/12/18 – 9/10/18		90-day window reviving claims for victims of Larry Nassar only closed on September 10, 2018. ²⁹
Minnesota	3-Year Window (2013)	Closed 5/26/13- 5/25/16		3-year window for expired claims against all types of defendants closed on May 25, 2016. ³⁰
Montana	1-Year Window & Age 27 Limit (2019)	Closed 5/7/19 – 5/6/20	Age 27	Permanently revived claims up to age 27 and 1-year window for expired claims against





				perpetrators and entities closed on May 6, 2020. ³¹
Nevada	Permanent Window & Age 38 Limit (2021)	Open 6/2/21- never closes	Age 38	Permanently open revival window for all expired claims against perpetrators or persons criminally liable for sexual abuse or exploitation of a minor (including trafficking, prostitution, and pornography) and promoters, possessors, or viewers of CSAM (child sexual abuse material) opened on June 2, 2021. Also, permanently revives claims up to age 38 for CSA and sexual exploitation of a minor against other defendants. ³²
New Jersey	2-Year Window & Age 55 Limit (2019)	Closed 12/1/19 – 11/30/21	Age 55	Permanently revived claims up to age 55 and 2-year window for expired claims against all types of defendants closed on November 30, 2021. Window applies to child sex abuse victims and those sexually assaulted as adults. ³³
New York	2-Year Window (2022)	Open 3/1/23-3/1/25		2-Year window for expired gender-motivated violence, including CSA and sexual assault claims, will open on March 1, 2023, against all types of defendants for abuse that occurred in New York City—Manhattan, Queens, Staten Island, Brooklyn, and the Bronx. ³⁴
	1-Year Window (2020)	Closed 8/14/20- 8/13/21		In 2020 extended original window by one year which closed on August 13, 2021. ³⁵
	1-Year Window (2019)	Closed 8/14/19- 8/13/20		1-year window for expired clams against all types of defendants opened on August 14, 2019. ³⁶
North Carolina	2-Year Window (2019)	Closed 1/1/20 – 12/31/21		2-year window for expired civil claims against all types of defendants closed on December 31, 2021. ³⁷
Northern Mariana Islands	Permanent Window (2021)	Open 11/10/21- never closes	No age limit	Permanently open revival window for all expired claims against all types of defendants opened on November 10, 2021. ³⁸
Ohio	5-Year Window (2023)	Open 10/12/23- 10/11/28		5-year revival window for CSA claims against the Boy Scouts of America bankruptcy estate opened on October 12, 2023. ³⁹
Oregon	Age 40 Limit (2010)		Age 40	Permanently revived claims up to age 40 against all types of defendants. ⁴⁰
Rhode Island	Age 53 Limit (2019)		Age 53	Permanently revived claims up to age 53 against perpetrators only. ⁴¹





Utah*	3-Year Window & Age 53 Limit (2016)	Closed 5/10/16- 5/9/19	Age 53	Permanently revived claims up to age 53 and opened a 3-year window, both for claims against perpetrators and persons criminally liable. The revivals were held unconstitutional. ⁴²
Vermont	Permanent Window (2019)	Open 5/28/19- never closes	No age limit	Permanently open revival window for all expired claims against all types of defendants opened on May 28, 2019. ⁴³
West Virginia	Age 36 Limit (2020)		Age 36	Permanently revived claims up to age 36 against all types of defendants. ⁴⁴
Washington D.C.	2-Year Window (2019)	Closed 5/3/19- 5/2/21		2-year window for expired claims against all types of defendants closed on May 2, 2021. Window applied to all child sex abuse victims up to age 40 and, in some circumstances, older victims and those sexually assaulted as adults. ⁴⁵

III. Analysis of SOL Revival Laws

This section analyzes the 33 jurisdictions that, since 2002, have enacted laws that revive civil suits for victims of child sex abuse whose SOL has already expired. Revival laws establish a specific period of time during which survivors can bring previously-expired civil claims to court. There are two types of revival laws: (1) revival windows and (2) revival age limits. When the revival period is a set amount of time after the law is passed, it is called a revival window, and claims can be filed while the window is open. States have opened windows for a few years or permanently. When the revival period is set at a survivor's age, it is called a revival age limit, and claims can be filed until a survivor reaches that specific age. The age states choose ranges from 27-55.

So far, the most popular means of reviving has been with a revival "window". Some revival laws include both windows and age limits, while some jurisdictions have chosen to revive via one or the other. Both types of laws enable adult victims of child sex abuse to sue their abusers and/or the institutions responsible years after they were abused. These revival laws have been instrumental in giving thousands of victims across America a long overdue opportunity for justice. They also make states a safer place for children by educating the public about hidden predators and institutions that endanger children in their communities.

a. Explanation of Revival Window Laws

California was the first state to enact a revival window after 2002 to help past victims of abuse. Since then, 23 more states—Delaware, Hawaii, Minnesota, Georgia, Utah, Michigan, New York, Montana, New Jersey, Arizona, Vermont, North Carolina, Kentucky, Arkansas, Nevada, Louisiana, Maine, Colorado*, Maryland, Ohio, Indiana, Alabama, Iowa—and three territories—Guam, Washington D.C., and Northern Mariana Islands—have opened windows. These windows have varied in length and by the types of defendants that are permitted to be sued.





The most effective way to remedy the wrong of having unreasonably short SOLs for so long is to completely revive all expired claims with a permanently open revival "window." This is exactly what Guam did in 2016. Vermont and Northern Mariana Islands did so too in 2021. Maryland opened a permanent revival window in 2023, but it is not as strong as others because claims are subject to damage caps and deceased victims are excluded from the window. With these permanent windows, any person that was sexually abused as a child may sue their abuser or any responsible person or institution when they are ready. In effect, the law was shifted to accommodate the inherent barriers to disclosure.

The next best windows are those in Arkansas, California, Delaware, Hawaii, Louisiana, New Jersey, and New York because the windows are or were open for two or more years and clearly apply to claims against any type of defendant: perpetrators, individuals, institutions, and the government. The less effective windows are those that only revive claims against perpetrators, like in Georgia, Nevada, and Utah. The least generous windows are in Alabama, Indiana, Iowa, Michigan, and Ohio. Michigan's window only helped victims of Larry Nassar, while Alabama, Indiana, Iowa, and Ohio's are only helping victims of the Boy Scouts of America. They leave a gaping hole of injustice for all other victims of child sex abuse in their states.

States like Massachusetts, Pennsylvania, and Rhode Island do not yet have windows and are continuing to protect hidden predators and put children at risk.

A window report card grading U.S. States and Territories on the quality of their windows is included below.

W	/indow Repo	ort Card
/indow l civil c	laws open access to justice for adult sur laims already expired. Survivors can sue	vivors of child sex abuse whos while the window is open.
Α	Vermont, Guam, & N. Mariana Islands	Window permanently open for claims against <u>all</u> types of defendants
A –	Maryland	Window permanently open for claims against <u>all</u> types of defendants, but has exclusion for deceased victims and damage caps
В	Arkansas, California, Delaware, Hawaii, Louisiana, New Jersey, & New York	Window for 2 or more years for claims against <u>all</u> types of defendants
С	Arizona, Maine, Minnesota, Montana, North Carolina, & Washington D.C.	Window, but not explicitly for claims against all types of defendants
D	Alabama, Georgia, Indiana, Iowa, Michigan, Nevada, & Ohio	Window, but explicitly limited to claims against specific types of defendants, like perpetrators & Boy Scouts
F	Massachusetts, Pennsylvania, Rhode Island, & All Other States	No window, hidden predators & bad acting institutions are protected





b. Explanation of Revival Age Limit Laws

The revival age limit laws have opened the courthouse doors to adult victims by allowing them to bring suits for previously expired claims up until they reach a certain age. The cut-off age varies from West Virginia's age thirty-six to Connecticut's age forty-eight, and age fifty-three in Massachusetts and Rhode Island. The upside of these laws is that victims younger than the age limit are less pressured to bring claims within a set few years whether or not they are ready to come forward, which is the case with temporary windows. The downside is that older victims that are above the cut-off age are still barred from court. These laws also vary by which defendants are open to suit, with Connecticut as the best one, reviving suits against any type of defendant, and Massachusetts and Rhode Island with worse versions that only revive claims against a perpetrator.

c. Explanation of Laws with Both Revival Windows & Age Limits

Some states have revived expired claims of abuse via laws that open temporary windows for victims of all ages and allow victims to file claims until they reach a certain age, even after the window closes. The benefit of this hybrid approach is that it gives victims of all ages an opportunity to file claims and allows more victims into court on a schedule that fits their needs. This approach is particularly helpful for younger victims who are not fully aware of the abuse or its effects and have not disclosed yet. It also benefits all victims younger than the age limit who, for whatever reason, are not yet ready to file a lawsuit against their abuser or those responsible for their abuse before the window closes. However, a permanent revival window also avoids these issues and is preferable.

Utah was the first state to pass this type of hybrid revival law in 2016 when it attempted to open a three-year window and enact revival until a victim reaches age fifty-three for claims against perpetrators only. However, Utah's revival law was held unconstitutional.⁴⁶ In 2019, Arizona, California, Montana, and New Jersey improved on Utah's approach, and all passed revival laws that included a window and an age limit for claims against perpetrators and other types of defendants. In 2021, Nevada opened a permanent revival window for claims against perpetrators only, and revived claims against other defendants up to age thirty-eight. New Jersey's law is the strongest and empowers the most victims with its two-year window and revival up to age fifty-five. Arizona and Montana's revival laws are less effective with shorter windows and younger revival age limits, age thirty and twenty-seven, respectively.

d. Revival Law Ranking

This subsection takes a snapshot of all the jurisdictions that have revived claims for victims whose SOL had already expired. It analyzes all three types of revival laws with a focus on who they help and for how long. The states are ranked in the chart below based on what aged victim the revival law covers, the length of time the revival window is open, and which individuals and entities can be sued. Guam, Maryland, NMI, and Vermont have the best revival laws, because their windows are permanently open for claims against all defendants. Maryland's permanent window may appear to rank well alongside them, but its practical application falls short in comparison. This is due to the presence of damage caps on claims and the exclusion of deceased victims from the window, making it less helpful than the others in real-life scenarios. Recently, Alabama, Indiana, Iowa, and Ohio opened limited revival windows only for claims against the bankruptcy estate of the Boy Scouts of America. These states stand alongside





Michigan as having the worst windows because they help so few survivors. The following graphic illustrates the rankings of each jurisdiction's civil SOL revival law for child sexual abuse claims.



e. Revival Laws Extending into 2024

There are multiple revival laws in effect that can help survivors of child sex abuse gain access to justice. The U.S. jurisdictions with open revival windows in 2024 include Alabama, Arkansas, Guam, Indiana, Iowa, Louisiana, Maine, Maryland, Nevada, New York City, NMI, Ohio, and Vermont. The revival windows in Guam, Maine, Maryland, Nevada, NMI, and Vermont are permanently open, and the end dates for the other revival windows are in the graphic below. The jurisdictions with age limit revivals in place in 2024 include Arizona (30), California (40), Connecticut (48), Kansas (31), Massachusetts (53), Montana (27), Nevada (38), New Jersey (55), Oregon (40), Rhode Island (53), and West Virginia (36).





¹ Alabama: Ala. Code § 6-2-8(b)(2) (2024); <u>S. B. 18, 2024 Leg., Reg. Sess. (Ala. 2024)</u>.

¹⁶ HAW. REV. STAT. § 657-1.8; 2018 Haw. Sess. Laws 98 (S.B. 2719).



² ARIZONA: <u>AZ ST § 12-514</u>; "ARIZONA CHILD PROTECTION ACT", <u>H.B. 2466</u>, 54th Leg., 1st Reg. Sess. (ARIZ. 2019).

³ Arkansas: <u>Arkansas Act 616; S.B. 204</u>, 94th General Assembly, Reg. Sess. (Arkansas 2023); <u>ARK. CODE ANN. § 16-118-118.</u> While there is legislative intent to extend the existing window by another two years, the amending language may have created a 6-month gap during which the window is closed from August 1, 2023 until January 31, 2024, before opening again on February 1, 2024.

⁴ Arkansas: "Justice for Vulnerable Victims of Sexual Abuse Act", <u>Arkansas Act 1036; S.B. 676, 93rd General Assembly, Reg. Sess. (Arkansas 2021); ARK. CODE ANN. § 16-118-118.</u>

⁵ CAL. CIV. PROC. CODE § 340.1 (2020); "CHILD VICTIMS ACT," 2019 Cal. Legis. Serv. Ch. 861 (A.B. 218).

⁶ Cal. Civ. Proc. Code § 340.35 (1-year window); S.B. 1678, 2004 Gen. Assemb., Reg. Sess. (Cal. 2004); *Stogner v. California*, 539 U.S. 607 (2003) (holding California Penal Code section 803 unconstitutional).

⁷ CAL. CIV. PROC. CODE § 340.1 (2002); 2002 Cal. Legis. Serv. Ch. 149 (<u>S.B. 1779</u>).

⁸ <u>Aurora Public Schools v. A.S., 2023 CO 39 (Col. June 20, 2023)</u> (holding, "the CSAAA is unconstitutionally retrospective to the extent that it permits a victim to bring a claim for sexual misconduct based on conduct that predates the Act and for which previously available causes of action were time-barred" and "clarifying" that "there is no 'public policy exception' to the ban on retrospective laws in article II, section 11 of the Colorado Constitution) <u>affirming Saupe v. Aurora Public Sch.</u>, No. 2022CV30065 (Colo. Dist. Ct. Aug. 3, 2022).

⁹ "CHILD SEXUAL ABUSE ACCOUNTABILITY ACT," <u>SB21-088</u>, 73rd Gen. Assemb., 1st Reg. Sess. (Colo. 2021) (effective, January 1, 2022).

¹⁰ CONN. GEN. STAT. § 52-577D; 2002 Conn. Legis. Serv. P.A. 02-138 (S.H.B. 5680).

¹¹ DEL. CODE tit. 18, § 6856; 2010 Del. Laws Ch. 384 (H.B. 326).

¹² Del. Code tit. 10, § 8145; "CHILD VICTIM'S ACT," 2007 Del. Laws Ch. 102 (S.B. 29).

¹³ GA. CODE § 9-3-33.1; "HIDDEN PREDATOR ACT," 2015 Ga. Laws Act 97 (H.B. 17).

¹⁴ 7 GUAM CODE ANN. §§ 11306, 11301.1(b); P.L. 33–187:2 (2016).

¹⁵ 7 GUAM CODE ANN. § 11306(2) (2011); Public Laws No.31-06 (2011).



- ¹⁷ HAW. REV. STAT. § 657-1.8; 2014 Haw. Sess. Laws 112 (S.B. 2687).
- ¹⁸ HAW. REV. STAT. § 657-1.8; 2012 Haw. Sess. Laws 68 (S.B. 2588).
- ¹⁹ IND. CODE ANN. §§ 34-11-2-4 (2024); Pub. L. No. 79-2024, 2024 Ind. Legis. Serv. (West).
- ²⁰ 2024 Ia. Legis. Serv. S.F. 2431 (West's No. 87).
- ²¹ S. Sub for HB 2127, 90th Leg., 2023 Reg. Sess. (Kan. 2023).
- ²² Ky. Rev. Stat. Ann. § 413.249; 2021 Kentucky Laws Ch. 89 (HB 472).
- ²³ Thompson v. Killary, No. 2022-SC-0308-DG, 2024 WL 646733 (Ky. Feb. 15, 2024) ("We hold that while the statute is remedial in nature and should be applied retroactively, Appellants hold a vested right in asserting a statute of limitations defense that is not overcome by the addition of a new triggering event and KRS 413.249 does not provide for the revival of time-barred claims.").
- ²⁴ <u>La. Stat. Ann. § 9:2800.9;</u> 2024 La. Sess. Law Serv. Act 481 (S.B. 246).
- ²⁵ LA. STAT. ANN. § 9:2800.9; 2021 La. Sess. Law Serv. Act 322 (H.B. 492).
- ²⁶ ME. STAT. tit. 14 § 752-C; 2021 Me. Legis. Serv. Ch. 301 (H.P. 432) (L.D. 589). See ME. STAT. tit. 14 § 8103.
- ²⁷ "THE CHILD VICTIMS ACT OF 2023," 2023 Md. Laws Ch. 6 (H.B. 1); 2023 Md. Laws Ch. 5 (S.B. 686).
- ²⁸ MASS. GEN. LAWS ch. 260, § 4C; "SEXUAL ABUSE OF MINORS," <u>2014 Mass. Legis. Serv. Ch. 145 (H.B. 4126)</u>. ²⁹ MICH. COMP. LAWS § 600.5851b; 2018 Mich. Legis. Serv. P.A. 183 (S.B. 872).

- 30 MINN. STAT. § 541.073, 2013 Minn. Sess. Law Serv. Ch. 89 (H.F. 681)
 31 MONT. CODE § 27-2-216; "TORT ACTIONS--CHILDHOOD SEXUAL ABUSE," 2019 Mont. Laws Ch. 367 (H.B. 640).
- ³² NEV. REV. STAT. ANN. §§ 11.215, 41.1396; 2021 Nevada Laws Ch. 288 (S.B. 203).
- ³³ N.J. STAT. ANN. §§ 2A:14-2A & 2A:14-2B; 2019 N.J. Sess. Law Serv. Ch. 120 (S.B. 477).
- ³⁴ N.Y.C. ADMIN. CODE § 10-1105; (Am. L.L. 2022/021, 1/9/2022, eff. 1/9/2022), available at https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCadmin/0-0-0-7248.
- 35 New York: N.Y. C.P.L.R. 214-g; "Child Victims Act" 2019 Sess. Law News of N.Y. Ch. 11 (S. 2440); Executive Order No. 202.29 (2020); S.B. 7082, 2020 Leg., Reg. Sess. (N.Y. 2020).
- ³⁶ N.Y. C.P.L.R. § 214-g (2019).
- ³⁷ N.C. GEN. STAT. ANN. § 1-17; 2019 North Carolina Laws S.L. 2019-245 (S.B. 199).
- ³⁸ 2021 N. Mar. I. Pub. L. 22-12 (H.B. 22-2).
 OHIO REV. CODE ANN. § 2305.111; 2023 Ohio Legis. Serv. Ann. 12 (H.B. 35).
- ⁴⁰ OR. REV. STAT. ANN. § 12.117; "CHILD ABUSE," 2009 Or. Legis. Serv. 879 (H.B. 2827).
- ⁴¹ R.I. GEN. LAWS ANN. § 9-1-51; 2019 R.I. Pub Laws 19-83 (19-H 5171B).
- ⁴² UTAH CODE ANN. § 78B-2-308; 2016 Utah Laws Ch. 379 (H.B. 279).). See Mitchell v. Roberts, 469 P.3d 901, 903 (Utah
- ⁴³ Vt. Stat. Ann. tit. 12, § 522; 2019 Vt. Legis. Serv. No. 37 (H. 330).
- ⁴⁴ W. Va. Code Ann. §55-2-15; 2020 W. Va. Legis. Serv. Ch. 2 (H.B. 4559).
- ⁴⁵ D.C. CODE ANN. § 12-301; 2018 D.C. Sess. Law Serv. 22-311 (Act 22-593).
- ⁴⁶ Mitchell v. Roberts, 469 P.3d 901 (Utah 2020), reh'g denied (July 13, 2020).

