

Senate Bill 277, was in fact signed into law by Governor Jerry Brown on the same day that Ms. Won's paper was submitted for review: June 30, 2015.

The requirement of vaccination as a condition of enrollment in public schools has a long history of judicial review. Ms. Won begins her account of the relevant state and federal cases in the nineteenth century. It seems that parents blindly opposed to vaccination inhabit the same forget-the-facts anti-intellectual space as climate-change deniers. Recently, a retracted report of a wholly unproven correlation between the principal childhood vaccines and autism has led to a four-fold spike in parental claims for a "religious" or "personal-belief" exemption of their children from vaccination. This threatens the herd immunity of school children, which is the only defense against epidemic disease for children who, because they have degraded immune systems (often incident to organ transplants or cancer treatment) would likely be killed by otherwise routine vaccinations.

The enactment of SB 277 has already spawned lawsuits and proposed ballot measures. Ms. Won's careful and sustained analysis in support of SB 277's constitutionality suggests that, in court at least, the opponents of comprehensive vaccination of public school students are unlikely to shut down this particular experiment in the laboratories of democratic federalism.

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## EDITOR'S NOTE:

Among the goals of the California Supreme Court Historical Society and its journal are to encourage the study of California legal history and to give exposure to new research in the field. Publication of the following "Student Symposium" furthers both of these goals.

Professor John Oakley, who offers a course each year in Constitutional Law at the University of California, Davis School of Law, graciously agreed to propose to his Spring 2015 students that they consider writing on California aspects of the topic, with the possibility that the most promising papers might be accepted by the journal. From those provided by Professor Oakley, three appear on the following pages as a student symposium on intersections of federal and California law.

— SELMA MOIDEL SMITH