

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
SOUTHWESTERN DIVISION**

MKB MANAGEMENT CORP, et al.

Declaration and Expert
Report of
Martha W. Shuping, M.D.

Plaintiffs,

Civil No. 1:13-CV-071

-vs-

BIRCH BURDICK, et al.,

Defendants.

Martha W. Shuping, M.D., declares and states the following:

DECLARATION OF MARTHA SHUPING, M.D.

I. PROFESSIONAL BACKGROUND AND CREDENTIALS

1. I am a medical doctor specializing in psychiatry licensed in the state of North Carolina licensed to practice in the state of North Carolina. I graduated from the Wake Forest University School of Medicine with the M.D. degree in 1984, and completed psychiatry residency at the Wake Forest University Baptist Medical Center in 1988. My Curriculum Vitae is attached as Exhibit A. I have been retained by the Office of the Attorney General, Civil Litigation Division as an expert witness on behalf of the State of North Dakota in defense of House Bill 1456.

2. Within my clinical experience, I have spoken with more than one thousand women who have requested help in regard to abortion related mental health problems. As a practicing psychiatrist, I have provided individual psychiatric treatment for many women with mental health problems associated with a past abortion. I have also conducted more than fifty abortion recovery weekends for groups of women who have requested help with emotional issues and psychiatric disorders associated with past abortions. I have treated many women who have experienced coerced, pressured, and forced abortions. I have treated women who have been victims of rape and incest, and have experience with women in these situations who have carried a pregnancy to term and with women in these situations who have chosen abortion. I have also treated women who have had abortions due to fetal abnormality, who subsequently experienced mental health problems associated with the abortion. I have treated women who have had mental health problems associated with miscarriages, stillbirths, and have also treated women with post-partum depression. I also have treated men and women with PTSD arising from various past traumatic experiences of various types including childhood physical abuse and childhood sexual abuse.

3. I have provided educational programs within the U.S. and in 15 countries in North America, South America, Europe and Asia, to train professional counselors, health professionals, and peer counselors to help women experiencing negative emotions and psychiatric disorders associated with past abortions. I have provided accredited continuing education for physicians, nurses and counselors on this subject.

4. I am a co-author of published research related to abortion and women's mental health. Because of my clinical experience with women experiencing abortion related mental health problems and also because of my knowledge of the abortion and mental health research, I was appointed by the President of Division 48 of the American Psychological Association to a task force with the purpose of establishing a research agenda in regard to abortion and mental health. As a member of this task force since April, 2013, I have been a participant in discussions with researchers of diverse backgrounds and viewpoints concerning abortion and mental health, specifically including members who are pro-choice and those who are pro-life in their personal views. The complete name of this task force is, American Psychological Association, Division 48, Society for the Study of Peace, Conflict, and Violence: Presidential Task Force for a Research Agenda on Abortion from a Peace Psychology Perspective (A.P.A. Div. 48 Task Force).

5. I have also had experience with women who are in the process of making decisions regarding their pregnancy. This experience includes psychiatric patients who have come to me as their treating psychiatrist, seeking assistance with their decision making in regard to an unintended pregnancy. This also includes volunteer work at a pregnancy resource center, Birthright, where I served as Assistant Director, then Executive Director, over a five year period, during which I provided some direct client services as well as training and supervision of volunteers, interns and staff. My experience also includes volunteer work as an abortion counselor during 1973 while a

university undergraduate student, serving at a clinic which provided counseling and referrals for abortion services.

6. I have been a registered participant at the United Nations Commission on the Status of women annual meetings in 2005, 2008, 2009, and 2011, and have been a workshop presenter during 2008, 2009, and 2011, on women's mental health and abortion. My CV is attached as Exhibit A.

7. The opinions provided herein, which are held to a reasonable degree of medical certainty, are based upon more than 25 years of experience as a psychiatrist, and the knowledge I have obtained through my education, training, research and consulting experience, voluntary experience, discussions with colleagues, attendance at conferences, and ongoing review of the medical and scientific literature, which includes but is not limited to published literature concerning mental health issues associated with postpartum depression, pregnancy loss (abortion, miscarriage, stillbirth and other perinatal losses), attachment including maternal-fetal attachment, posttraumatic stress, and complicated mourning. It would be impossible for me to provide a complete list of all sources which have contributed to formulating my opinion, but some of the most pertinent are discussed in my report and included in a list of citations following this report.

II. INTRODUCTION

8. I was retained by the Office of the Attorney General, Civil Litigation Division as an expert witness on behalf of the State of North Dakota in defense of House Bill 1456. In my opinion, within reasonable medical and scientific certainty, the provisions of HB 1456 are necessary to protect women from the well-substantiated increased risk of mental health, emotional and psychological problems and disorders associated with and caused by abortion, and in particular the adverse and profound adverse effects abortion has on the mental, emotional and psychological health and well-being of women.

9. I provide these opinions in opposition to Plaintiffs' Motion for Summary Judgment against enforcement of North Dakota House Bill 1456, now codified at North Dakota Century Code Sections 14-02.1-05.1 14-02.1-05.2 and 43-17-31. My understanding is that North Dakota's HB 1456 prohibits an abortion¹ if the unborn child² the pregnant woman is carrying has a detectable heartbeat, absent certain exceptions such as to prevent the death of a pregnant woman, to prevent a serious risk of substantial and irreversible impairment of a major bodily function of the pregnant woman, or to save the life of an unborn child. In addition to the benefit of protecting human life, HB 1456 will directly benefit the emotional, mental and psychological well-being of women of

¹ In referring to an "abortion," I am referring to the definition found in N.D.C.C. § 14-02.1-02(1), and being an induced termination of a clinically diagnosed intrauterine pregnancy of a woman with knowledge that the termination will with reasonable likelihood cause the death of the unborn child.

² I may sometimes refer to the term "unborn child," which shall have the same meaning as that term is defined in N.D.C.C. § 14-02.1-02(18) to mean the offspring of human beings from conception until birth.

reproductive age in North Dakota. To the extent that fewer abortions occur, fewer women will be at risk for mental health, emotional and psychological problems, and fewer women will be at risk for problems in their relationships with their children and their partners. Women who choose abortions will do so before a detectable heartbeat is present which will serve to reduce mental health, emotional and psychological problems associated with and caused by abortion and will reduce the risk for problems in relationships with their children and their partners.

10. I have been requested to give an expert opinion on the effect of abortion on women's mental health, emotional and psychological well-being.

11. In rendering my expert opinion, I utilized and considered testimonials and information I have received from women who have had abortions that I have diagnosed and personally counseled and treated for mental health problems and disorders over the course of my 25 year psychiatric medical career.

12. In rendering my expert opinions, I have also reviewed and considered testimony of approximately 4,500 women who had abortions. These testimonials include both declarations under penalty of perjury and affidavits of women who have experienced abortions, and these also form a part of the basis of my expert opinion. It is customary, in the field of psychiatry, to utilize patient accounts in forming professional opinion, in addition to considering the published research. Patient accounts are used in diagnosis, of course, but are also sometimes quoted in published research for illustrative purposes. In addition, because these are sworn testimonies, they actually have a higher value for accuracy and reliability than some of the patient history, anecdotal data and opinion

surveys of women suffering from mental trauma that are customarily used by professionals in the field of psychiatry. The declarations and affidavits and that I reviewed and that were utilized and considered in rendering my opinions are as follows:

- a. Statements from 96 women from North Dakota, South Dakota, Minnesota, and Montana, which have been submitted in some cases in the form of notarized affidavits, or in other cases as declarations. In regard to the North Dakota women, these include statements of six women within this group of 96 statements, identified by these names and Bates Numbers:
Jody Clemens (Bates Nos. 1119-20), Ruth Ruch (Bates Nos. 1121-22),
Terry Melby (Bates Nos. 1123-24), Erin Hill (Bates Nos. 1125-26),
Rhonda Nygaard (Bates No. 1127), Kay Kiefer (Bates Nos. 1128-29).
Many women have signed their full name and have given permission for their full name to be used, but some women have requested that only initials be used and for these women, the names have been redacted. In using material from these statements as examples below, I will state the actual name or initials according to what appears on the document and will reference the state they are from, or will refer to the “96 women” in considering this group of women as a whole. These statements of Ms. Clemens, Ms. Ruch, Ms. Melby, Ms. Hill, Ms. Nygard, and Ms. Kiefer are collectively attached as Exhibit B-1 and note the bates numbers that were assigned to them in discovery for this case. The other statements and affidavits that I used from the other women from North Dakota, South

Dakota, Minnesota and Montana are attached as Exhibits B-2 bates numbered 1576 to 1749.

- b. A group of approximately 180 affidavits from post-abortive women excerpts of which were previously submitted to the U.S. Supreme Court within an amicus brief in regard to *Gonzales v. Carhart*, and which were cited in that decision. These excerpts and affidavits are attached to the Affidavit of Allen E. Parker, Jr., dated November 25, 2013, as Exhibits 2 and 3, bates 1138 through 1458. I understand this affidavit and these exhibits are being submitted by the State of North Dakota in response to the Plaintiffs' summary judgment motion.
- c. Approximately 4,200 statements of post-abortive women, some in the form of notarized affidavits and others in the form of declarations that I have been asked to review. To identify these, real names will be used if permission was given to use full name, or if identifying data was redacted at the women's request for privacy, then initials will be used, and the group will be referenced as the "4200." Because of the volume of these statements it would be impossible to attach each and every statement to my declaration and therefore, I have only attached those that I have specifically referenced, which are representative and illustrative of these 4,200 statements in general and in total, These affidavits are attached to my declaration as Exhibit C and bates numbered 1750 to 1754.

d. Additional affidavits that have been obtained during the course of this litigation and disclosed to the Plaintiffs. These affidavits are attached as Exhibit D and bates numbered 1755 through 1793.

To refer collectively to all the documents included in a, b, c and d, nearly 4,500 in all, I will reference "the affidavits and declarations."

Also, because of the volume of the affidavits and declarations I reviewed and considered, it would be impossible to recite to each and every one of them with respect to the opinions I have rendered. Rather, I have cited to those affidavits and declarations that are representative and illustrative of the information contained in the affidavits and declarations in general and in total.

13. To be very clear, I cannot make a diagnosis on any woman from the statements I reviewed because the diagnosis would require a complete, individual psychiatric or psychological evaluation. However, these statements were utilized and considered in rendering my opinions, because they are examples of and wholly consistent with the testimonials and information I have received from the post-abortive women I have treated for mental health, emotional and psychological symptoms, problems and disorders over the course of my twenty-five year psychiatric career. Therefore, I utilized and considered these testimonials to avoid disclosure of my patients' personal information, yet show that post-abortive women I treat for mental health, emotional and psychological symptoms, problems and disorders have consistent stories and accounts of the mental, psychological and emotional problems encountered as the women in these testimonials. Further, these testimonials and statements noted are also illustrative of the mental health, emotional and

psychological symptoms, problems and disorders that have been identified in the published research. They provide additional weight and support for and are a part of the basis of my professional expert opinion. Finally, these testimonials allowed me to make some general observations.

14. In rendering my expert opinions, I have also reviewed and considered the deposition testimonies of Dr. Eggleston and Tammi Kromenaker taken on November 26, 2013. I understand these deposition transcripts are being submitted by the State of North Dakota in response to the Plaintiffs' motion for summary judgment. In rendering my expert opinions, I have also reviewed and considered statements assumed to be patients (also a partner and some family members) of the Red River Women's Clinic, which were disclosed in the discovery of this case by the Plaintiffs. These are unsigned (no names or initials); therefore I will refer to these individually by number and collectively as "Red River Women's Clinic patients." These statements were provided by the plaintiffs in discovery and the statements are attached hereto as Exhibit F and have bates number PL 624 to PL 675 that were assigned by Plaintiffs. At pages 55-57 of the deposition transcript of Tammi Kromenaker, (conducted on November 26, 2013), she stated that these statements came from "patient journals at our clinic" and further testified "We have patient journals throughout the clinic and patients or their support person who comes with will often be seen writing in them. The recovery room is where most of that writing occurs 'cause it's a more private space.'" However, she also testified, "There's no way to know the identity of a specific patient who wrote those."

15. Apparently the Red River Women's Clinic patients' statements were written in journals that are left at various places throughout the clinic, and the comments are written anonymously. From Ms. Kromenaker's testimony, the authorship of any of the comments cannot be known or discovered. Additionally, since they are not notarized documents and not declarations given under penalty of perjury, I would not assign to them the same weight compared to the declarations and affidavits. In writing a declaration or affidavit, there is some careful thought involved in choosing one's words accurately, and with the affidavit there is the additional step of proving one's identity before a magistrate, though preparation of either an affidavit or a declaration would indicate that the person has taken some time and considered their words carefully to give an accurate statement to be used for legal purposes. In contrast, it's not possible to know with certainty that the Red River Women's Clinic patients' statements were actually all written by patients (one appears to be written by a patient's partner, and one by a patient's mother), and if written by patients, many may have been written in the recovery room while the patient was perhaps still under the effects of anesthesia or pain.

16. It is also unclear how many were written before the abortion vs. after the abortion. Originally, at page 56 of the deposition transcript, in response to the question "So these are...patients that have already had an abortion?" Ms. Kromenaker testified, "yes," then later clarifying as above that the journals are throughout the clinic, but often women choose to write in the recovery room. However, from my reading of the statements, in some statements the writer indicates she is waiting for her abortion, while in others the writer states she is in recovery, and in many statements it is not clear whether the

statement is being given before or after the abortion. In terms of using these statements to better understand whether abortion improves women's mental health or whether abortion worsens women's mental health, they are of limited usefulness since some were written before, rather than after the abortion, and it's not definitely possible to tell which were before and which after. In either case, it is more important to consider the longer term effects of the abortion, rather than only the first thirty minutes after the abortion.

17. Thus, in my opinion, these the Red River Women's Clinic patients' statements are limited in their usefulness, but nevertheless, I have reviewed and considered them in rendering my expert opinions and will discuss their content and give my expert opinion in regard to their content further below.

III. NO MENTAL HEALTH BENEFITS FROM ABORTION

18. Dr. David M. Fergusson of New Zealand is a researcher who was invited to serve as a member of the APA Div. 48 Task Force on abortion research, on which he served for approximately six months during 2013. It is well known that his personal views are "pro-choice," and he served on the APA Div. 48 Task Force as a "pro-choice" member, since there was desire to have balance among membership in order to try to avoid bias and to consider all viewpoints in regard to the research. I know from serving with him, through personal communication between myself and Dr. Fergusson within the Task Force, that he is certainly pro-choice.

19. Dr. Fergusson has expressed concern that there has been very little published research on the mental health benefits of abortion, if any. "Few reviews have considered the extent to which abortion has therapeutic benefits that mitigate the mental health risks

of abortion" (Fergusson et al., 2013). With this in mind, he undertook a meta-analysis of eight studies that included several different mental health outcomes. A meta-analysis pools and re-analyzes data from several studies, and can provide a conclusion that is more reliable than the individual studies.

20. Fergusson's recent study was specifically to consider the "hypothesis that abortion reduces rates of mental health problems in women having unwanted or unintended pregnancy." His results showed: "There was consistent evidence to show that abortion was not associated with a reduction in rates of mental health problems," and the results were statistically significant.

21. He states: "For all analyses considered, there is no evidence to suggest that rates of mental health problems were lower in women having abortion than in comparison groups of women having unwanted pregnancy. This conclusion held for all studies, all authors, and all outcomes considered, irrespective of variations in study quality...."

(Fergusson et al., 2013).

22. His conclusion: "There is no available evidence to suggest that abortion has therapeutic effects in reducing the mental health risks of unwanted or unintended pregnancy."

23. Based on the foregoing and on my own clinical experience and my own extensive review of the literature, to a reasonable degree of medical and scientific certainty, I conclude and it is my opinion there are no mental health, emotional and psychological benefits from abortion.

IV. ABORTION HAS A PROFOUND AND SIGNIFICANT ADVERSE EFFECT UPON THE MENTAL HEALTH, EMOTIONAL AND PSYCHOLOGICAL WELL-BEING OF WOMEN

24. In my opinion, to a reasonable degree of medical and scientific certainty, the overwhelming preponderance of scientific and medical evidence demonstrates abortion is a substantial contributing factor and cause of increasing the risk of mental health, emotional and psychological problems for women that have had an abortion, and in turn abortion has a profound and significant adverse effect on women's mental health, emotional and psychological well-being. Therefore, in my opinion HB 1456 protects women from these adverse effects of an abortion and in turn promotes the health, safety and well-being of women, along with protecting the life of unborn children and health and well-being of their families, and is medically and scientifically sound and reasonable. Along with my own clinical experience and my own extensive review of literature, further supporting information for these opinions is presented below.

(A) Suicide after abortion:

25. The following studies and literature support my opinion that women that have abortion have an increased risk of suicide and suicidal thoughts.

26. A large record-based study in Finland reported a higher rate of suicide after abortion. Women who had an abortion had a 650% higher risk of death from suicide compared to women who carried to term. This study linked actual death certificates to medical records (Gissler et al., 1996).

27. The higher suicide rates after abortion persist for several years and are highest for younger women. This was seen in a large study of more than 173,000 California

Medicaid records in which the increased rate of suicide persisted for the 8 years studied, and which was not explained by prior mental illness (at least not during the year preceding the target pregnancy) (Reardon et al., 2002).

28. A records based U.K. study comparing suicide attempts before and after abortion indicated the increase in suicide rates after abortion was not related to prior suicidal behavior but was most likely related to adverse reactions to the abortion (Morgan et al., 1997). The rate of attempted suicide remained level or decreased before and after pregnancies that resulted in giving birth. But following abortion, the suicide rate increased from a normal baseline to a significantly higher rate.

29. There are reports of attempted or completed suicides coinciding with the anniversary date of the abortion or expected due date of the aborted child (Tischler, 1981; Reardon , Strahan, Thorp, & Shuping, 2004). This would tend to indicate a possible causal relationship between the abortion and the suicide or attempted suicide.

30. Risk of death by suicide is reduced in women who carry a pregnancy to term. In the Finland study, women giving birth had a suicide rate about half that of the general population of Finnish women" (Gissler et al., 1996).

31. Several studies have shown carrying a pregnancy to term and giving birth are associated with a reduced risk of suicide (Appleby, 1991; Appleby et al., 1995; Drower & Nash, 1978; Jansson, 1965).

32. "In one study of women with prior psychiatric problems, none of those who carried to term subsequently committed suicide over an eight-to-thirteen year follow up, while five per cent of those who aborted subsequently committed suicide" (Reardon, et

al., 2004). A study of Canadian women also showed that women with previous psychiatric problems had a higher suicide rate after abortion (Greenglass, 1976).

33. Teens are at much higher risk of a suicide attempt after abortion. Researchers at University of Minnesota found suicide attempts increased ten-fold for teens who were post-abortive in the preceding 6 months (Garfinkel et al., 1986). Fergusson et al. (2006) found that 50% of post-abortive teens (15-18 years) had suicidal thoughts and behaviors, double the rate for pregnant but never aborted, and double the rate of never pregnant girls.

34. There is a much higher rate of suicide in post-abortive women compared to women who have given birth. Women who have given birth have a suicide rate that is below the community baseline. Even in women with prior mental illness, it still holds that those who have abortions have higher rates of suicide, while those who give birth have the lowest rate of suicide, lower than the non-pregnant baseline.. The data consistently show that the risk of suicide is less after giving birth, and higher after abortion.

35. Based on the foregoing, within reasonable medical and scientific certainty, it is my opinion that women having abortions are at increased risk of suicide and suicidal thoughts, compared to baseline community rates of suicide, and compared to other pregnancy outcomes, and women giving birth are at decreased risk of suicide compared to baseline community rates of suicide and compared to other pregnancy outcomes.

(B) Researchers on both sides agree: Some women have problems after abortion.

36. Researchers on both sides of the abortion issue agree that some women have mental health problems after abortion. For example, in 1992, the Journal of Social Issues

dedicated an entire issue to research relating to the psychological effects of elective abortion. In an overview of the contributor's papers the editor, Dr. Gregory Wilmoth (1992), concluded: "There is now virtually no disagreement among researchers that some women experience negative psychological reactions postabortion" [after abortion].

37. *A Clinician's Guide to Medical and Surgical Abortion* ("Clinician's Guide") is a medical textbook written by leading abortion providers (Paul, et al., 1999) for the purpose of training abortion providers. This textbook bears the logo of the National Abortion Federation on its cover. A chapter on counseling in *Clinician's Guide* identifies a number of "negative reactions" that some women experience after abortion, including: depression, guilt, shame, regret, and grief. (Baker, 1999).

38. According to *Clinician's Guide*, symptoms of depression include the following (as well as several other symptoms):

- a. "crying frequently."
- b. "suicidal ideation" (suicidal thoughts and behaviors).
- c. "performing poorly at work or school."
- d. "losing interest in enjoyable activities."
- e. "feeling worthless."

39. According to *Clinician's Guide*, symptoms of "severe guilt" include the following symptoms, below. Note that although these are listed as symptoms of "severe guilt" in the textbook, in fact, the symptoms identified in "b" through "d" below are also symptoms of Posttraumatic Stress Disorder which will be discussed further below. (American Psychiatric Association, 2013).

- a. "Engaging in self-punishing behaviors such as substance abuse, indiscriminate sex, and
- b. "Nightmares about killing or saving babies."
- c. "Blocking out the experience."
- d. "Avoiding anything that triggers memories of the event."
- e. "Fearing God's punishment."
- f. "Interpreting any misfortune, illness or accident as signs of God's punishment."

40. According to *Clinician's Guide*, symptoms of shame include the following, listed below. Note that although "self-destructive behavior" is listed in the textbook as a symptom of "shame," it is also a symptom of Posttraumatic Stress Disorder as we will discuss in another section.

- a. "Relentless thoughts of being a bad person."
- b. "Engaging in self-destructive behaviors."
- c. "Inordinate fear of anyone finding out about the abortion."
- d. According to Clinician's Guide, symptoms of regret include:
- e. "Believing a different decision would have resulted in a more desirable outcome."
- f. "Dwelling only on negative consequences attributed to the abortion decision."

41. According to *Clinician's Guide*, "symptoms of unresolved grief include engaging in thoughts and behaviors that perpetuate a strong emotional investment in the pregnancy or that prevent the redirection of emotional energy into moving forward with life."

42. The symptoms identified above are all symptoms that have been reported to me on numerous occasions by the women who come to me seeking help for mental health, emotional and psychological problems and disorders that they identify and I diagnose as being associated with their abortion.

(C) Risk factors for mental health, emotional and psychological problems after abortion.

43. Researchers on both sides of the abortion issue also agree that there are a number of well established "risk factors," supported by numerous studies, which are "predisposing factors" (the term used in *Clinician's Guide*) for mental health, emotional and psychological problems after abortion. Women who have these risk factors are more vulnerable to mental health, emotional and psychological problems after abortion. The textbook *Clinician's Guide* gives a list of factors that may predict increased risk of negative outcomes after abortion. I hold this opinion that there is agreement on many of these risk factors through having done extensive literature searches and reading studies by researchers on either side of the issue and it is very clear that there is agreement on a number of pre-existing conditions that if present places a woman at increased risk for mental health, emotional and psychological problems after abortion. I have also discussed the topic of risk factors within the A.P.A., Division 48, Task Force, on which I am a current member. The *Clinician's Guide* lists 14 such risk factors and cites some of the studies which established these particular risk factors.

44. A newer textbook, *Management of unintended and abnormal pregnancy: Comprehensive Abortion Care* (“*Comprehensive Abortion Care*”), by many of the same authors and many of the same editors (Paul, et al., 2009) lists 18 risk factors, including the same or similar risk factors from the earlier textbook, with some additional risk factors listed, in a chapter on counseling (Baker & Beresford, 2009). Note that this textbook also bears the logo of the National Abortion Federation on its cover. Below is a listing of 15 risk factors selected from *Comprehensive Abortion Care* which are extremely important in understanding the mental health, emotional and psychological effects that many women experience after abortion. There are additional risk factors that are also well established and agreed upon by researchers from both sides which will be discussed further below.

- a. “Commitment and attachment to the pregnancy.”
- b. “Perceived coercion to have the abortion.”
- c. “Significant ambivalence about the abortion decision.”
- d. “Putting great effort into keeping the abortion a secret for fear of stigma.”
- e. “Advanced stage of pregnancy.”
- f. “Preexisting experience of trauma.”
- g. “Past or present sexual, physical, or emotional abuse.”
- h. “Unresolved past losses and perception of abortion as a loss.”
- i. “Fetal Abnormality or other medical indications for the abortion.”
- j. “Intense guilt and shame before the abortion.”
- k. “An existing emotional disorder or mental illness prior to the abortion.”

- l. "Appraisal of abortion as extremely stressful before it occurs."
- m. "Expecting depression, severe grief or guilt, and regret after the abortion."
- n. "Belief that abortion is the same act as killing a newborn infant."
- o. "Lack of emotional support and receiving criticism from significant people in their lives."

45. Additional information on these and other established risk factors are included within the declaration of Dr. Priscilla Coleman, particularly in Exhibit D which is dated December 2, 2013 and is being submitted by the State of North Dakota in response to Plaintiffs' motion for summary judgment (I will refer to this report as the "Coleman Report"). I agree with the risk factors that Dr. Coleman has identified and will refer to some of these further below.

(D) Maternal – child attachment during pregnancy (prenatal bonding)³

(1) Introduction

46. Most people have some understanding of mother-child bonding during pregnancy. Popular magazines, baby books and websites tell parents that bonding begins in the womb, and that bonding can be enhanced by talking to the baby, singing to the baby, or by other parental actions (Babycentre, 2011). Medical journals are also giving the same advice to health care professionals working with pregnant women, that prenatal bonding can be enhanced by these activities (Verny, 1984).

³ In discussing mother-child bonding occurring during pregnancy, I will use the terms "maternal-fetal attachment," "maternal-fetal bonding," "prenatal bonding or attachment," or "maternal-child bonding during pregnancy" interchangeably, since they appear to be used interchangeably within the published literature irrespective of the age of the unborn child. I will use these terms to refer to bonding that takes place between a woman and her unborn child.

47. Consider first the risk factor of “commitment and attachment to the pregnancy.”

See also Exhibit D of the Coleman Report noting the 18 studies under the heading “Commitment to the Pregnancy,” which serve as additional evidence that commitment to the pregnancy is a risk factor for problems after an abortion. Experts on both sides recognize that if a woman is committed to the pregnancy and if she has in fact “attached” (bonded) to her unborn child, that she is more vulnerable to having psychological, emotional and mental health distress after an abortion. When a woman has bonded to her baby but then has an abortion, it is my opinion, the woman will experience distress at the loss of her child, and research confirms that. However, at face value, it is a jarring concept to think that women are aborting an unborn child to which they are “committed and attached.” It is important to consider the reasons that women abort babies to whom they have already bonded, and to consider how this affects women in the short term and in the long term. In my opinion, this situation occurs very frequently, that women experience attachment to their children but nonetheless obtain abortions. In my opinion, the loss of children through abortion in the presence of maternal bonding is a major source of many of the mental health symptoms, problems and disorders that many women experience after abortion.

48. In professional literature, maternal-fetal attachment has been defined as “the extent to which women engage in behaviors that represent affiliation and interaction with the unborn child.” (Cranley, 1981). This definition indicates that there can be varying degrees of attachment.

49. The reality of prenatal bonding is widely accepted in the medical and scientific literature. A PubMed search on maternal – fetal attachment shows hundreds of published articles, and similarly, a PubMed search on prenatal bonding also reveals hundreds of articles on this topic. These articles do not question whether or not prenatal bonding exists, but rather, examine what factors may enhance bonding, or consider factors that may decrease bonding. But there is no question that mother-child bonding occurs during the prenatal period. Many reports over the past 68 years have repeatedly concluded that attachment begins during pregnancy, and often very early in pregnancy, shortly after conception. (Deutsch, 1945; Bibring, 1961; Benedek, 1970; Klauss & Kennel, 1976; Peppers & Knapp, 1980; Condon, 1986; Borg & Lasker, 1989; Gilbert & Smart, 1992; Rando, 1993; Muller, 1996; Speckhard, 1997).

50. But does prenatal bonding take place in women seeking abortions? In legal testimony given in 1996 (published in 1999), Dr. Anne Speckhard stated, regarding the issue of attachment in regard to the wantedness vs. unwantedness of the pregnancy: “Psychological attachment is common in pregnancy, beginning for some women even in early pregnancy. As a human process, attachment occurs irrespective of perceived wantedness of the pregnancy. The basis of maternal attachment is both psychological and physical. On the psychological level attachment relies upon the images a woman is forming of her fetal child, images which invoke protective responses within her. The protective urges of maternal attachment form often irrespective of the pregnancy having been intended or wanted.”

51. Published research shows that even in women seeking abortion, maternal attachment to the unborn child has been demonstrated. For example an Australian study of women attending an abortion clinic revealed that 40% of the women reported talking to their unborn child, and 30% endorsed “patting my tummy affectionately.” (Allanson & Astbury, 1996). Additionally, 50% of the women stated that they had thought about whether it was a boy or a girl, and 50% also stated that they had “thought or daydreamed about what kind of mother I would be.” These thoughts and behaviors indicate attachment to the unborn child.

52. More recently, a Swedish study collected information from 499 women who had requested abortion (Stalhandske, et al., 2012). Sixty seven percent of these women “thought of the pregnancy in terms of a child.” This was one of several “existential components” that “correlated to difficulty in making the abortion decision and poor psychological wellbeing after the abortion.” It is worth noting that 97% of the women in this study were still within their first trimester at the time of the abortion, thus, it is seen that this bonding takes place early in pregnancy among women seeking abortions.

53. In addition to asking questions that could be answered as "yes" or "no" and questions using a numerical rating scale, women were invited to comment in their own words. One woman stated, “Immediately when I found out I was pregnant, I felt like a mother. It felt like I had some kind of affinity with the child, and now afterwards, it feels empty,” (Stalhandske, et al., 2012) indicating that this mother experienced maternal-child attachment very early in pregnancy, at the time she first discovered the pregnancy.

54. Another woman stated, "I lit a candle for the little one and asked for forgiveness," which is another example of maternal-fetal bonding since there would be no need to light a candle "for the little one" or ask forgiveness, unless the woman experienced the existence of some relationship that was being affected by the abortion (Stalhandske et al., 2012). Almost half of the women reported that they had done some special action such as asking for forgiveness following the abortion. The authors particularly noted that Swedish society is very secular, with only one third of Swedes considering themselves "religious," and with only 2% holding the belief that abortion is never justifiable, indicating a much higher level of support for abortion among their population compared to other western countries including the U.S.. Nevertheless, a high percentage of Swedish women in this study reported attachment to the unborn child and felt a need for "special acts."

55. The authors concluded that "women's experiences of abortion can include...feelings of attachment to the foetus...." (Stalhandske et al., 2012). The authors pointed out their study supports previous findings "that women who terminate a pregnancy can describe feelings of maternal attachment to their pregnancies" (Stalhandske et al., 2012, citing: Halldén et al., 2005; Allanson & Astbury, 1995). Prenatal bonding can and does take place in a sizable number of those women seeking abortions, and this recent study confirms that the presence of the attachment is associated with poor psychological outcomes (which confirms what was stated by Baker & Beresford, 2009, that attachment to the pregnancy is a risk factor for mental health problems after abortion.).

56. Rue et al. (2004) in a study of post-abortive women from a general gynecology population found that 37% of Russian women and 39% of American women reported they had felt emotionally close to or attached to the pregnancy / child, and only 24% of each group said they experienced "no bonding," while the remainder were "unsure."

57. While it is impossible to know the precise number of women who have undergone abortions and at the same have experienced some bonding to their unborn child, clearly a substantial number report experiencing bonding.

58. Consider also the statements of women concerning their personal experience of prenatal bonding prior to abortion. MKK is a woman who had an abortion in Rapid City, South Dakota, in 1978. See Exhibit B-2, Bates 1711. In her 2005 affidavit she stated, "Even though my abortion was in the first few weeks of pregnancy, there was still a connectiveness with the baby within me. Whether a physically formed baby is visible or not it is a real baby and we (mother and baby) were connected." This is similar to the statements of many women in my clinical experience.

59. Joanna (pseudonym) is a woman I know who has given me permission to tell her abortion story. Joanna was 16 years old when she became pregnant. She said, "I knew it was a baby. I was excited about the baby. I wanted the baby, and mom was getting excited, too." She was trying to make a plan for her baby's future, considering various options including possibly adoption though she reported that she was trying to figure this out on her own with "no counseling whatsoever." While she was still trying to find options, her boyfriend's father made the appointment for the abortion. She said that "at the time of the abortion, I wanted the baby." But she also says, "I didn't feel I had any

choice.” After a visit to a doctor to initiate an abortion procedure, she was taken home where she passed her baby in the toilet. “There the baby was, a perfect little baby boy. I thought, oh, my God, what have I done.” This example is one of numerous of reports I have heard from women in my clinical experience, indicating prenatal bonding prior to an abortion. Clearly, the fact of an abortion taking place cannot be assumed to mean that no maternal-child attachment took place, nor does it mean that the mother did not want the baby. One could attempt to make the case that Joanna is “different” from other women seeking abortions in that she “wanted” the baby who was aborted, but in reality, that makes her very similar to numerous women I know who had abortions that they didn’t want and in many cases tried to avoid.

60. In my opinion, there is clear evidence that maternal – child attachment or bonding is experienced by a significant number of women even those who obtain induced abortions, and even during early pregnancy, within the first trimester.

(2) Long duration of attachment to aborted child

61. Speckhard (1997) states that "the attachment to the developing fetus/embryo may persist despite its death," which can include miscarriage, stillbirth or abortion.

62. In a study by Dykes et al. (2011, first published online in 2010), women at the age of menopause were asked to discuss their thoughts and feelings concerning their past abortions that had taken place decades earlier. All the women in this study reported that they continued to think about the child they had aborted many years previously, expressing long lasting attachment and unresolved grief. This study clearly shows that

maternal-child bonding can persist for decades after an abortion. Some examples (using pseudonyms as given in the published study):

- a. Jenny said, "I've always thought of him ... wondering how old he'd be, I do wonder about that child" (Dykes et al., 2011).
- b. Elaine said, "This child of mine would have been (number of years) this month," referring to the expected due date she had been given for her pregnancy. She said, "I still think about this baby...I don't think I'll ever forget if I live to be a hundred" (Dykes et al., 2011).
- c. Tina reported "wondering what it would have been like now, how old would it have been" (Dykes et al., 2011).

63. MKK (SD, also quoted above) had reported bonding prior to the abortion, but the attachment also persisted for years. Twenty-seven years after her abortion, she reported continuing to think about her aborted child: "I often wonder if it was a girl or a boy." See Exhibit B-2, Bates 1711.

64. CL, who had an abortion in South Dakota in 1984, and signed a declaration in 2008, stated, 24 years after the abortion, "I think about the child I aborted almost every day." See Exhibit B-2, Bates1715-16.

65. Debbie L. Otto (real name) had an abortion during 1975, and later signed an affidavit in 2001 in Montana, in which she referred to her two living daughters then stated: "I've never quit thinking about my other baby [her aborted baby] who would be 25 ½ by now - I've had nightmares and depression...Abortion not only kills a baby -- it hurts women who bear the shame and guilt silently -- it touches every aspect of her life exactly

like it would to give birth and to kill it then." See Exhibit B-2, Bates 1673. This is an example of a woman who has been remembering her aborted child for more than 25 years, who also reports experiencing shame, guilt and emotional distress during this entire period of time. She said, "I'll never get over it as long as I live."

66. Statements such as these, the statements from women in the study and the statements made by MKK, CL, and by Ms. Otto, are very similar to the statements I have heard frequently in my clinical experience with women who have had abortions. Numerous women have come to me with unresolved abortion issues, from abortions that took place, 10, 20, or 30 years ago, and sometimes longer.

67. Rose (pseudonym) had an abortion at age 17, in 1975 (Shuping & Gacek, 2010; Shuping, 2011). She said, "I really wanted this child, but I didn't know what to do." She paid for the abortion herself through savings from a job, and through selling some treasured possessions. She reported that after the abortion, "I thought about him every day," wondering about the color of his eyes, the color of his hair, whether he would like sports. She had learned her child was a boy, so she read books about infant care to learn about baby boys. In this case, bonding not only persisted beyond the death of the unborn child, but actually grew stronger over time, through her continued thoughts and activities (such as reading infant care books). This has occurred with some of my patients, and has been noted in the published literature.

68. Rose discussed how as the years went by, she married and had children, but the memory of the aborted child intruded into her family life and impacted her relationships

with her husband and children for many years, an example of the long duration of attachment to the aborted unborn child that many women experience.

69. Mary (pseudonym) went to nursing school after her abortion (Shuping & Gacek, 2010; Shuping, 2011). She reported that during her training, "I was working the ER, and a young woman came in pregnant, cramping. I was helping to examine her as she miscarried, and in my hand, I could see the baby. It made me think of my baby, and I wanted him back." The miscarried baby was about the same gestational age and size as the baby she lost to abortion. This experience caused her to have distressing thoughts about her past abortion, and it was this experience that led her to seek treatment for issues related to the past abortion.

70. Mary's experience as a nursing student is a type of experience that for some women increases the bonding to their own fetal child. Some women who may have had limited attachment or no apparent attachment to their aborted unborn child at the time of the abortion may see something later that causes them to recognize their fetal child as a baby, and as "my baby," increasing feelings of regret, guilt, grief, or other negative emotions associated with the abortion. For some women, this occurs during a later, intended pregnancy when the women sees the ultrasound image and realizes her own aborted child would have looked like the image she is now seeing, or during a later, intended pregnancy when she hears a fetal heartbeat and realizes that the aborted child would also have had a heartbeat . Or a nurse or other healthcare professional who had an abortion in the past may later encounter fetal images or a miscarried baby as Mary did,

which may then lead to increased attachment to the aborted child, and increased distress over the death of the aborted child.

71. I have heard testimonials of this type of occurrence from a number of my patients, who have sought treatment for psychological problems and disorders which they have associated with a past abortion, and which I have diagnosed as being associated with a past abortion. Events such as this sometimes contribute to a much greater degree of attachment to the aborted child and contribute to greater distress later, even years after the abortion, when the woman becomes aware of the aborted baby as her child and then experiences distress at the child's death through abortion. Speckhard has also observed that, 'in the case of a woman who learns more about fetal development later a delayed post-traumatic reaction may result" (1999). For some women, in my clinical experience, it is these later experiences that lead them to seek counseling or abortion recovery programs.

72. Some women report an experience of attachment to their baby occurring at the moment of the abortion or immediately afterward, and women have reported that they experienced the abortion as the death of their child.

73. For example, Joy (MN) was only 7 weeks pregnant at the time of her 1995 abortion, but in her 2008 declaration she stated, "During my abortion I physically felt the life of my baby being literally sucked out of me, and if I could have stopped it right then, I would have, but I knew it was too late for her." See Exhibit B-2, Bates 1632 to 33. Thus, in that moment, she recognized the unborn child as "my baby," recognized that the abortion was taking the life of her baby, and would have stopped it at that moment had it

been possible, but the procedure was already in progress. For Joy, the attachment to the aborted child persisted over many years, associated with distress at the loss of her aborted child. She stated, "For many years I suffered deep mental anguish over the loss of my baby. I relived the abortion procedure over and over and was traumatized by it. I hated myself for killing my baby and worried constantly.....I had flashbacks to the procedure for years afterward."

74. Jody Clemens (ND) in her declaration (Exhibit B-1, Bates 1119-20), states, "My name was called and I was ushered back to the procedure room where I underwent an excruciating and painful procedure. I cried. What I had worked to successfully deny and dehumanize now became a reality. I knew my baby was dead and what I had done I could never undo." Ms. Clemens did not report any prior experience of attachment to her baby; but at some moment during or immediately after the procedure, she did experience attachment to her baby, an attachment that has persisted over many years, also associated with distress over the loss of her baby. "The years that followed my 'free choice' were lost years in many ways. I engaged in self-destructive behavior and was emotionally exhausted as I worked to keep my secret.....I suffered in silence for ten years living with shame, guilt, and grief.....My child died that day and I will forever be hurt by that loss every day."

75. Terry Melby of North Dakota, who has submitted testimony concerning her abortion (Bates 1123-24), states, "After the abortion, I realized that I had taken the life of my child. No one told me that; I instinctively just knew it." See B-1, Bates 1123-24. She asks, "How could a good mother kill her own child?" and states that after the abortion, "I

began to drink very heavily and daily. I engaged in reckless, self-destructive behavior, drinking and driving with my kids in the car. I desired to become pregnant again, to replace the baby I had just lost. I was suicidal, and nearly completed a suicide plan less than a month after the abortion. I suffered with physical complications caused by the abortion. Everything in my life changed after the abortion, and it took years to recover from it." From Ms. Melby's statement, she understood the unborn child as "my child," she believed that she had "taken the life of my child," experiencing this as the death of her child. She blamed herself harshly for causing her child's death, and clearly suffered mental health consequences following the abortion. She experienced ongoing attachment to her child over many years, stating, "My child would be 32 years old now," and she states it took "years to recover" from the effects of the abortion.

76. These statements made by Joy (MN) (¶ 73 above), by Jody Clemens (ND) (¶ 74 above), and by Terry Melby (ND) (¶ 75 above) are similar to reports given to me by patients within their medical and psychiatric history which I have considered in the course of psychiatric evaluations, in which I have diagnosed psychiatric symptoms, problems and disorders associated with past abortion(s).

77. Based on the foregoing, it is my opinion that even when pregnancy is unplanned, and occurs under challenging circumstances and results in an abortion, significant maternal bonding frequently occurs, and this bond can persist well beyond the unborn child's death, for many years, even decades, for many women. Some women who do not report prior bonding to the unborn child do experience awareness of attachment to their baby while they are undergoing an abortion procedure or immediately afterward, and

attachment arising at that time frequently persists for many years. Even when bonding may be weak or ambivalent at the time of the abortion, the attachment can persist and grow stronger over time. However, although this attachment persists after abortion, it persists within a situation of disruption and loss. The bonding is a natural process that serves to prepare the mother to care for her child after birth. When bonding is present, but abortion has occurred, the abortion is often a source of enduring psychological distress, experienced by many women. I will discuss below the effects of abortion when bonding has occurred, though some of the statements of women who have been quoted above have touched on some of the distress they have experienced.

78. Not all mental health problems or relationship problems following abortion are necessarily related to maternal-fetal attachment. It is important to recall that there are other risk factors besides "attachment to the pregnancy," and mental health problems that can occur whether or not bonding has taken place. Nevertheless, the experience of abortion in a context of maternal-fetal attachment is a very important and unique risk factor which requires further consideration as below.

(3) **Psychological, Emotional and Mental Health effects of abortion when maternal - fetal bonding has occurred**

79. A 2004 study by Rue et al. revealed that for both American and Russian women, bonding to the unborn child was predictive of a negative psychological outcome. Earlier published literature has reported that the degree of bonding is predicable of the degree of trauma symptoms that are experienced after abortion. (Speckhard, 1985; Speckhard, 1987; Speckhard, 1997; also Speckhard & Rue, 1992).

80. Speckhard (1999) has stated that "When maternal attachment occurs in pregnancy, even very early pregnancy, the traumatic disruption of this attachment bond is capable of causing enduring psychological damage. The consequences of disrupting maternal attachment via abortion can include psychological trauma and bereavement resulting in complicated mourning."

81. Kersting et al. (2007) stated, "The traumatic loss of an unborn child by induced termination of pregnancy because of fetal malformation is a major life event that causes intense maternal grief." Here, Kersting is only considering terminations associated with fetal malformation and not due to other reasons. The purpose of this study was to identify, through measurements of brain activity, which parts of the brain were affected by grief associated with fetal loss. The study compared post-termination women with women who delivered a healthy child. The brain activity was different in the women who terminated, who demonstrated "an involvement of the neural maternal attachment network in grief after the loss of an unborn child." Thus, there is an actual biological basis for the grief after loss of an unborn child.

82. Returning to the study by Dykes et al. (2011), which involved women who had chosen to terminate for non-medical reasons (elective abortions), "participants described the long-term emotional impact of their termination of pregnancies as predominantly negative....." From some of the interviews, it appears that time has not diminished these negatives which the women reported (see quotations from the women of this study, below), and for some women, the impact is the same or greater now than at the time of

the abortion. Negative emotions included shame, guilt, and regret, with some women reporting nightmares, flashbacks and additional symptoms.

- a. Ann said, "It's haunted me to be honest, I'm ashamed, I think it's just something else I have to hate myself about" (Dykes et al., 2011).
- b. Claire said, "I'll probably have nightmares the rest of my life, I hate myself so much" (Dykes et al., 2011).
- c. Elaine stated that the abortion was "wrong," stating, "I feel worse than a prostitute." She also made it clear that her feelings about the abortion related to her action in ending the life of her fetal child: "I was just so depressed, I didn't want to live anymore, I was suicidal and I started drinking, because all I could think about is that I've murdered this baby..." She stated she had originally "thought it would be okay," when she chose abortion, but it affected her "a lot more than I ever thought it would" (Dykes et al., 2011).

83. In considering whether they think about the abortion more or less now that they are menopausal (Dykes et al., 2011), Mary said, "As I've got older I feel guilty and more aware of what I did ... I think about it more now." Elaine said, "I've never not thought about it, but it never hurt me as much as it has now, I feel as hurt as I did when I first had it done." Barbara also reported she thought about it more as she got older. Clearly, the emotional impact can remain as intense, or can worsen as the years go by. This study was small and not designed to be generalizable, but it does show that for some women, the intensity of the distress can persist or worsen over time, which has been shown in other

studies. Acknowledging that the methodology was not intended to lead to generalizations, the authors (Dykes et al., 2011) did recommend, based on this study, that women should have access to "post-termination" counseling "throughout life," apparently due to the long lasting negative reactions that these women reported.

84. In the case of Rose (see ¶ 67 above) who had experienced bonding to her child before the abortion, she stated, "I didn't anticipate how strong the feeling of loss and regret would be. Even before the abortion, I already felt shame and guilt, but I didn't think I would have all the regret which I did almost immediately." Her negative feelings were very severe: "I hated myself after the abortion and tried to commit suicide." Soon after the abortion, she attempted to shoot herself but the gun misfired, then took a massive overdose of pills as a suicide attempt but after sleeping for two days, awakened unharmed. (Shuping & Gacek, 2010; Shuping, 2011) She continued to experience abortion related mental health problems and problems with family relationships for many years until receiving help through an abortion recovery program.

85. MKK (SD, see Exhibit B-2, Bates 1711) who reported bonding prior to her abortion, and lifelong persistent attachment to her aborted child, reported lifelong distress. "Year after year I kept my secret, and year after year I suffered not only the pain of losing my child but the guilt and shame of what I had done. I cannot tell you the mental anguish that that abortion has had on my life."

86. Erin Hill is a North Dakota woman who had an abortion at age 16 and who has submitted written testimony for this case (See Exhibit B-1, Bates 1125-26). She was a young woman who unknowingly went into an abortion with multiple risk factors present.

Ms. Hill stated that she "really wanted to keep my baby," but "decided that I had to have an abortion," indicating that she was experiencing ambivalence which is a risk factor for negative reactions after the abortion (Baker et al., 1999; Baker & Beresford, 2009; Coleman Report, Exhibit D). Adolescence has also been determined to be a risk factor (Coleman report, Exhibit D; Curley & Johnston, 2013; Mulfel, 2003; Shuping, 2011; Speckhard & Rue, 1992).

87. Ms. Hill was also experiencing attachment to her baby. When she attended a counseling session, she says she "cried the entire time..... I remember the counselor asking me why I was crying. I was upset that she had to ask. 'I'm here to have an abortion. To kill my baby.'" Prior to the abortion she was already thinking of the pregnancy as "my baby," and she considered the abortion as the killing of her baby. She reported that during the abortion procedure, "I cried the entire time, saying 'I'm sorry, I'm so sorry' over & over. The nurse held my hand and asked why I was sorry. I told her I was telling my baby I was sorry because I didn't know what else to do."

88. Not surprisingly, Ms. Hill reports a negative reaction to the abortion, stating, "It poisoned my life." She reported that she became promiscuous and began to drink, also suffering from depression. These are some of the negative reactions that were listed in *Clinician's Guide* (Baker et al., 1999) as being associated with abortion for some women, and many of my own patients have reported these symptoms as being associated with their abortions, and I have diagnosed these symptoms as being associated with my patients' past abortions.

89. Speckhard (1999) states, "For the woman whose individual meanings define pregnancy as involving the conception of a human being, abortion is a human death event. This death event is further complicated for the women who has formed an image of her fetal child and who has begun an attachment to this child; abortion then becomes defined for her as the death within her body of "my own child."

90. We see an example of what Speckhard was describing in Erin Hill, who said, "I'm here to have an abortion. To kill my baby." MKK (SD) (see B-2, Bates 1712) also expresses the concept of killing her child: "We who have had abortions have chosen to kill our children. We understand, too late, what we have done. I must live with the fact that I chose my reputation and my social appearance over the life of my child. It was my choice and I regret it to this day."

91. Speckhard (1999) states that "trauma researchers generally agree that abortion is capable of causing enduring psychological harm for some women. Abortion for the woman who defines her unborn child as her own child, involves a death experience which is volitional, intended, and horrific, even more so for the woman who becomes aware of details of her abortion experience." She states that even though a "crisis pregnancy" can be stressful, abortion is a unique "stressor by virtue of containing a traumatic death event capable of engendering deep and enduring psychological trauma." Speckhard (1999) states, that "traumatic stress from an abortion event can function as the basis of the etiology of a number of ... psychopathologies," including posttraumatic stress disorder and other disorders. "For the woman who perceives the fetus as human and who may have formed an attachment, the abortion stressor event is defined by her as the actual

death of her offspring." Speckhard testified that "for these women, abortion is experienced as...a human death experience from which PTSD can follow" (testifying according to the diagnostic criteria in place at that time).

92. In the examples of Joy (Exhibit B-2, Bates 1632-33), Jody Clemens (Exhibit B-1, Bates 1119-20), and Terry Melby (Exhibit B-1, Bates 1123-24), above, each has reported experiencing the unborn child as her own "baby," and each experienced the abortion as the death of her baby. Each of these women experienced this as intended and volitional, as each was at the clinic for the purpose of having an abortion and each was at the clinic by her own choice, and not by force. Each experienced the abortion as a source of enduring emotional distress over many years. The testimonials of these women are very similar to testimonials of many women who have come to me seeking professional help for mental health symptoms, problems and disorders that they attribute to a past abortion and that I have diagnosed as attributable to a past abortion.

93. In reviewing the published literature concerning the impact of maternal-fetal attachment in the context of abortion, there is some clarification needed, concerning attachment that persists beyond death, and "disruption" of that bonding when abortion takes place. "Disruption" could perhaps be understood as meaning the cessation or termination of the relationship, but this is not what occurs, based on women's statements, and based on the published literature. From careful review, I would clarify as follows: It is very frequent, even in the first trimester, for maternal – fetal bonding to take place. Even when an abortion takes place, the woman still has attachment to the unborn child, with whom she has identified as "my baby," but the baby is gone and the relationship is

forever altered in a way that is experienced as a loss and as a death experience for the woman which is a source of enduring emotional distress for the woman.

94. To make a comparison, if a woman's mother died, even though the mother is no longer physically present, the relationship persists in some fashion, in the thoughts and memories. The woman still refers to the mother as "my mother" and she may do certain things to respect or honor her mother, for example, giving to a charity that was important to her mother, or even making a career decision based on her mother's previously expressed desires. Alternatively, if the relationship were conflicted, the daughter might make decisions of which her mother would not approve, and the daughter might even take satisfaction in the decisions. But there is a sense in which there is still a relationship after death; there is still "my mother" in thoughts and memories, but at death, that relationship is forever altered, and a loss is experienced since the person is no longer physically present, and the opportunities for future companionship or interaction are no longer present.

95. For the many women who bond to their baby prior to or during the abortion (or who experience delayed bonding which occurs at a later time), the bonding very often persists for years, even decades, but it becomes a source of emotional pain, since the child is no longer available for the relationship which the mother may later desire—or which she may have desired even at the time of the abortion. The bonding does not end with the death of the child, nor does the perceived relationship end with the death of the child, since the mother who has already bonded to her baby may still consider the baby as "my baby." But the opportunities for enjoyment of that relationship and for interaction

are gone, and opportunities for continued development of that relationship are extremely limited. A mother may choose to read baby care books, as Rose did, with the desire to maintain some connectedness to her child, and the attachment may actually increase through such behaviors. The relationship is now characterized by loss. The actual opportunities for a living relationship with the child no longer exist. The mother cannot physically breast feed the aborted child or kiss her child goodnight, cannot watch the child play baseball or see him graduate from college. As Lisa (MN), stated in her 2009 declaration, "Abortion takes a life away, one that I can only dream of having gotten to know and raise." See Exhibit B-2, Bates 1652-53. The bonding or attachment does not end, and the relationship does not end, but the relationship is characterized by disruption and loss and it becomes a source of pain, particularly for those women who experience the abortion as described by MKK (SD) in her 2005 affidavit, "We who have had abortions have chosen to kill our children." See Exhibit B-2, Bates 1711. For many women, a relationship they now desire with their aborted child is no longer accessible to them, and they live with the knowledge that the lost opportunities, and the physical death of their child, came about by their own decision.

96. Thus, in my opinion, maternal-fetal bonding or attachment (mother-child bonding to the unborn child) is a source of significant, enduring psychological, emotional and mental health distress for many women who have abortions. In my opinion, many women experience abortion as a death experience, in many cases experiencing this as the death of "my baby." For those women who experience abortion as a death experience, and especially as the death of "my baby," this death experience is a trauma sufficient to give

rise to Posttraumatic Stress Disorder as will be discussed below. In my opinion, the death experience of this maternal-fetal bonding from an abortion also increases the risk for other psychological, emotional and mental health disorders in addition, but here we will specifically discuss Posttraumatic Stress Disorder.

(E) Posttraumatic stress disorder after abortion (PTSD)

97. It should be noted first of all that the American Psychiatric Association (2013) has recently published a new diagnostic manual in which diagnostic criteria for many disorder have been modified, which is the case for the diagnosis of Posttraumatic Stress Disorder (PTSD). Thus, studies and reports which were published prior to 2013 were based on slightly different diagnostic criteria. Particular points within the diagnostic criteria have changed, but the main symptoms are in essence the same as before despite some changes. There are a number of specific criteria that must be met in order for this diagnosis to be made.

98. According to the American Psychiatric Association (2013), the diagnosis of Posttraumatic Stress Disorder (PTSD) starts with "exposure to actual or threatened death, serious injury, or sexual violence in one (or more) of the following ways," which can include "directly experiencing the traumatic event(s)," "witnessing, in person the event(s) as it occurred to others," or "learning that the traumatic event(s) occurred to a close family member. In cases of actual or threatened death of a family member or friend, the event(s) must have been violent or accidental."

99. Speckhard (1999) has testified, "For the woman who perceives the fetus as human and who may have formed an attachment, the abortion stressor event is defined by her as

the actual death of her offspring.....for these women, abortion is experienced as...a human death experience from which PTSD can follow," testifying according to the diagnostic criteria in place at that time that abortion presented a type of death experience that could serve as a trauma that could lead to PTSD.

100. Using current diagnostic criteria for PTSD, we will consider examples from the affidavits and declarations and also examples from published research to demonstrate how these PTSD criteria are frequently met by women who have had abortions. I discuss the criteria at Paragraphs 101-103 (directly experiencing the traumatic event), 104-105 (witnessing, in person the event(s) as it occurred to others), 106-107 (learning that the traumatic event(s) occurred to a close family member) and 108-117 (abortion as violent death).

101. **Directly experiencing the traumatic event:** For women having an abortion, who have experienced the abortion as the death of "my baby," there has been a death experience which they have directly experienced—the death of their baby in their own body. In considering the statements of Joy, (Exhibit B-2, Bates 1632-33) Jody Clemens (Exhibit B-1, Bates 1119-20), and Terry Melby (Exhibit B-1, Bates 1123-24) in describing their abortions, it could be said that they directly experienced the traumatic event, in that they were aware of the death of their baby in their own body at the time of the abortion. Karen Choma (MN) stated, "When the baby was aborted, I instantly and instinct[ively] knew I had ended a life," directly experiencing the ending of a life. Exhibit B-2, Bates 1639. I have heard similar reports from my own patients, and similar

examples have been included in published literature, for example, Speckhard & Rue (1992).

102. Although above we considered the woman directly experiencing the trauma of her baby's death, a woman having an abortion also or instead directly experiences "threatened death or serious injury" involving her own life. Mary A. Hill-Griffith (FL) (one of the *Gonzales* affidavits) stated that "immediately after abortion" she experienced severe hemorrhaging that required an "emergency D & C" procedure. By her report, she apparently believed herself to be at risk of death. See Parker Affidavit, Bates 1143-44, 1427.

103. Linda Huffstetler (TX), in her 2013 declaration, tells about experiencing severe life threatening complications when she had a first trimester abortion at 7 weeks during 1977. She says, "During the abortion the nurses told me I almost didn't make it and there was complications.....I was in recovery for the next 10 hours." Exhibit C, Bates 1753-54. She survived an experience in which she was told she almost died, and she also talks about the death of her baby through the abortion, so for her both types of traumatic experiences were present. Ms. Huffstetler states that she was later able to find reports that 14 young women had died during abortion procedures with the doctor who performed her abortion, and she has reflected on the possibility that she could have been one of those young women. She reports that she had PTSD for more than 30 years, and she lists a number of PTSD symptoms that we will review below including guilt, shame, anxiety, fear, anger, and nightmares.

104. **Witnessing, in person the event(s) as it occurred to others:** In cases in which women may have been exposed to fetal parts in the process of the abortion, it may be said that they witnessed "in person the event as it occurred" to their baby. I have had patients who have reported to me that they have seen fetal parts during the course of a surgical abortion, and this has been reported in the published literature (Speckhard, 1987; Selby, 1990). Additionally, in medical abortion by use of RU-486, it is common for women to see the expelled unborn child during the abortion procedure which is typically completed at home. I have had patients who have had medical abortions and have seen the expelled unborn child, and this has been reported by Hallden et al. (2009).

105. In later abortions, some women have experienced the baby's increased movements during the procedure and then the cessation of movement, which has been reported to me, and which is another way in which the woman may be a "witness" to the death of the unborn child.

106. **Learning that the traumatic event(s) occurred to a close family member:** In some cases, the precipitating event may have involved the situation of learning that the traumatic death occurred to a family member, their baby. An example of this is the case of Mary (Shuping & Gacek, 2010; Shuping, 2011) who as a nursing student held in her hand a miscarried baby and then realized that her own previously aborted unborn child would have been at that age and stage of development. A woman who experiences attachment to her baby at a later time and at that time comes to appreciate the meaning of the abortion as the death of her own child would be in a situation analogous to someone learning about the death of a family member at a later time.

107. The 2008 declaration of Patty Miller (SD) gives another example of this type of experience. Exhibit B-2, Bates 1740-41. She had a first trimester abortion at 8 weeks, and states, "The day I had my first child and held him in my arms was the day I realized I had truly killed two other babies with my poor 'choice.' The pain of realizing what I had done nearly killed the joy of receiving this new baby in my arms."

108. **Abortion as violent death:** Regarding the concept of abortion as a "violent" death, many of the women who have had abortions have given statements that indicate their understanding of the abortion as an act of violence.

109. Joni Lineberry (MT) in her 2010 declaration concerning her first trimester (10 weeks) abortion in 1975 stated, "I was not informed of the horror and pain that my baby would feel." Exhibit B-2, Bates 1688-89. Without commenting on research data as to what her unborn child may have experienced, clearly it is Ms. Lineberry's belief that her baby suffered because of the abortion, and it is her belief about the nature of the death experience that is relevant to her experience of the abortion as the traumatic death of her baby.

110. Linda Prok (MN) in her 2008 declaration concerning her first trimester abortion in 1981 stated, "No one told me that I would have to wait on the table while the doctor made sure that all the baby's parts had been removed. Now it was no longer 'tissue' as they had said, the baby had a body." Exhibit B-2, Bates 1650-51. It is usual that the physician or other personnel would check to make sure that all fetal parts were accounted for, because if fetal tissue were left inside the woman, complications such as infection or bleeding could follow. However, for Ms. Prok, her awareness that her baby "had a body" that was

in "parts" seems to have given her an understanding of her baby having experienced a violent death. She reports for more than 20 years she "suffered with the thought that I had taken my child's life," and carrying "the guilt for what I had done throughout my life." She also reported experiencing long lasting shame even at the time of the declaration, 27 years after the abortion.

111. Loretta Bingham (FL), in her affidavit (one of the *Gonzales* affidavits) stated, "I was called back into the clinic because they thought they hadn't gotten all the baby out of me." (See Parker Affidavit, Bates 1161, 1279.) "In my mind, I kept seeing an infant with its arms and legs pulled off. Twenty years later – it still hurts."

112. Darlene Crumbo (CA) in her affidavit (one of the *Gonzales* affidavits) stated, "It hurts so bad to think of the child I could have had. To think of the baby that was sucked out of me like a vacuum cleaner." See Parker Affidavit, Bates 1172, 1299.

113. Kristen Frank (MN) signed a declaration in 2008 concerning her 2007 abortion at 9 weeks. Exhibit B-2, Bates 1641-43. She stated, "I didn't realize that the 'scraping' and vacuum actually break up the being into pieces before it is sucked out. It's just extremely mutilating....." She also speaks of abortion as "killing your own child" by allowing another to use "instruments" to "mutilate your baby and then suck it out with a vacuum."

114. Rashel Brown (MT) signed a declaration in 2010 concerning her 1998 first trimester abortion. Exhibit B-2, Bates 1701-02. She gave a graphic description of what she believed occurred to the body of her unborn child during the abortion, and expressed her belief that the unborn child feels pain, a belief echoed in a number of the affidavits and declarations. She also stated her belief that killing the unborn child is "murder."

115. Many of the women who submitted affidavits and declarations used the term "murder" to describe their abortion, for example, Lisa (MN) who signed a declaration in 2009, stated, "Abortion is murder," and a number the women speak of their abortion in that way, or of the baby as having been murdered. Exhibit B-2, Bates 1652-53. Deanna Hall (CA) in her affidavit (one of the Gonzales affidavits) stated, "When I woke up in recovery, I immediately knew the horror of what I had done.....I am a murderer....." defining herself as a murderer. Parker Affidavit, Bates 1166, 1287.

116. I should add that none of the abortion recovery programs that I have served as a consultant have defined abortion as "murder," nor do the workbooks or participant manuals of any of the major abortion recovery programs in the U.S. use this term. The forms on which some of the affidavits and declarations are written include some questions in many cases, but none of the forms use the word "murder," and some of the women's statements were typed or written on blank paper without any specific questions to direct their answers in any way. Nevertheless, a number of women, in the affidavits and declarations, have spontaneously used the word "murder" as their expression of how they view the death of their aborted child. The women themselves often use the term "murder" in the affidavits and declarations both to describe the experience of their baby, and in judging their own action. Many of my own patients have also used the term "murder" in discussing the abortion when seeking treatment for abortion related mental health problems.

117. Speckhard and Rue (1992) refer to national polling data from *The Los Angeles Times* from 1989 (Skelton, 1989) indicating a majority of Americans (57%) viewed

abortion as murder. A more recent *Los Angeles Times* poll (Rubin, 2000) revealed that 57% of Americans still viewed abortion as murder. Elaine (in the study by Dykes et al., 2011), stated, "all I could think about is that I've murdered this baby..." Since Elaine is English, this would indicate that this viewpoint is not uniquely part of American culture, though it is a widespread belief in the U.S. In any case, many of the women themselves within the declarations and affidavits have reported viewing abortion as murder, which indicates that these women are viewing the abortion as a violent death, and this is similar to what my own patients have reported to me in discussing their psychiatric problems which they attribute to the abortion, and which I have diagnosed as being associated with their past abortions. Clearly, many women who have had abortions view the abortion as a violent death.

118. Prior to 2013, the previous criteria specified that "the person experienced, witnessed or was confronted with an event or events that involved actual or threatened death or serious injury, or a threat to the physical integrity of self or others," and also specified that the person's response involved "intense fear, helplessness or horror." (American Psychiatric Association, 1994). In either case, whether using old or new criteria, the death or threatened death was the initiating experience, but a number of specific types of symptoms must follow for the diagnosis of PTSD to be made.

119. There is abundant evidence that a substantial number of women do in fact experience PTSD after abortion. In order to make this diagnosis, after the death experience, there are currently four types of symptoms that must be experienced. To illustrate the types of symptoms in each category, I will use examples from my clinical

experience, from the published literature, and from the affidavits and declarations of post-abortive women. However, it is not my intent to state or imply that any of the women quoted actually have PTSD, since that diagnosis could only be determined by an individual psychiatric or psychological evaluation. But a number of women have reported specific symptoms that are characteristic of PTSD, and their statements are used below as examples.

120. **PTSD intrusion symptoms:** These include:

- a. "recurrent, involuntary, and intrusive distressing memories of the traumatic event(s),"
- b. "recurrent, distressing dreams in which the content and/or affect of the dream are related to the traumatic event(s),"
- c. flashbacks "in which the individual feels or acts as if the traumatic event(s) were recurring."
- d. "intense or prolonged psychological distress at exposure to ...cues that symbolize or resemble an aspect of the traumatic event(s)."

121. Intrusive, distressing memories were reported by Ruth Ruch (ND) in her statement (Exhibit B-1 Bates 1121-22). She says that after the abortion, "I tried so hard to erase the memory of my abortion." Her statement that she "tried" to eliminate the memory would seem to indicate that she the memory was involuntary. Her statement that she tried "hard" to erase the memory indicates some effort was required, and in the next sentence states she "struggled with alcohol addiction and thought of suicide often," which seems to reflect on the degree of distress she experienced from these memories. Much

later, "When I became pregnant with my last child, 14 years later, I studied furiously all the baby development books I could. I realized what my aborted baby looked like at 8 weeks and the memories came flashing back in tidal waves." These memories were sufficiently distressing to Ms. Ruch that, although pregnant at the time, "Once again, I began drinking heavily."

122. Nancy Hook (SD) states in her affidavit, referring to her abortion, "There is barely a day that goes by that I don't think about it," even after thirty years. Exhibit B-2, Bates 1739. Similar statements can be found throughout the affidavits and declarations, and I have frequently heard similar statements from numerous patients who I have evaluated for abortion-related psychiatric problems and disorders, similar in that the memories connected with the abortion are often present on a daily basis, persisting for many years. The memories can be so consuming, taking up so much of the woman's thoughts, that it interferes with normal life, as expressed by Ruth Ruch (ND, above) who stated, "It robbed me of nearly 20 years of my life."

123. Nightmares were reported by Claire in Dykes' study (2011), and by Debbie Otto (MT, Exhibit B-2, Bates 1673). Dianne Heynen (SD) in her 2008 declaration said, "I had no idea it would still be haunting me now after twenty-nine years.....Just last night I had an abortion related nightmare" (Exhibit B-2, Bates 1725-26). Pamela Berry (TX) said in her affidavit (one of the *Gonzales* affidavits), "I had nightmares of babies crying" (Parker Affidavit, Bates 1161, 1280). Teresa Renee Zell (NC) (one of the *Gonzales* affidavits) is another one of many who reported nightmares (Parker Affidavit, Bates 1153, 1264). As

noted above, *Clinician's Guide* (Baker et al., 1999) had listed nightmares about babies as a possible symptom of guilt, but it is also a symptom of PTSD.

124. Flashbacks were reported in the study by Dykes et al. (2011). Joy (MN, Exhibit B-2, Bates 1632-33), reported flashbacks in her affidavit, stating, "I had flashbacks to the procedure years afterward." Darla Weaver (TX) in her 2002 affidavit (one of the *Gonzales* affidavits) stated, "I can drive down the street and flashback to the abortion table" (Parker Affidavit, Bates 1156, 1269).

125. Intense distress at a cue that resembled the past trauma was reported in the affidavit of S.T. (TN) (one of the *Gonzales* affidavits): "Having the D & C after miscarriage brought back horrible memories of the abortion" (Parker Affidavit, Bates 1152, 1263). Kay Kiefer (ND) (Exhibit B-1 Bates 1128-29) also describes this symptom of distress at reminders of the abortion: "Every time... I heard something about abortion, I felt like a hot spear went right through me."

126. Unfortunately for many women, babies are a reminder of the abortion, and thus it can be emotionally painful for them to be around other people's children, or even their own children. Sandi Taylor (MT), for example, says in her affidavit, "Now I want to burst into tears every time I see a mother and child" (Exhibit B-2, Bates 1703-1706).

127. Carrie Sanchez (SD), in her affidavit, said that soon after her abortion she went to visit "one of my best friends who had just had a baby boy. I am sure she has never figured out why when I held him I began to cry" (Exhibit B-2, Bates 1719-23). She stated, "Every time I see my friend's son who is now 10 years old I am sadly reminded of [the abortion]. It never goes away." She stated that after she was married and was again

pregnant, "At my first ultrasound, I was exactly 8 weeks pregnant. I heard the baby's heartbeat and began to cry. These were not tears of joy. I instantly thought that I had killed a heartbeat just like that 9 years ago."

128. Megan Petty (MT) in her declaration states, "Seeing babies hurts my heart," even thirty-five years after the abortion (Exhibit B-2, Bates 1709-10).

129. When women experience distress associated with reminders of the abortion, this can lead to avoidance symptoms as discussed below at paragraphs 130-134. Since babies and children remind some women of the abortion, this can lead to avoidance of babies and children.

130. **PTSD avoidance symptoms:** Avoidance symptoms include efforts to avoid distressing memories, or avoidance of people, places, or activities that serve as reminders of the abortion (a type of symptom that was also listed in *Clinician's Guide*, as above). Some women I know have reported driving miles out of their way to avoid driving past the abortion clinic. Some women avoid going for routine gynecological care because the examination reminds them of the abortion. Some women avoid family gatherings when babies would be present at holidays, or avoid baby showers for family members, because they do not want to be around babies or anything that would cause them to think about babies, because babies are a distressing reminder of the abortion.

131. Mary Ellen York (MI) stated in her affidavit (one of the *Gonzales* affidavits), "For years, I couldn't even look at a baby and when I heard the word "abortion" I would just cringe" (Parker Affidavit, Bates 1153, 1265).

132. Becky Abell (OK) in her affidavit (also one of the *Gonzales* affidavits) states, "I avoided anything to do with babies." Ms. Abell married and gave birth to a son, five years after the abortion (Parker Affidavit, Bates 1150, 1259). She says, "It was during that pregnancy I realized I had destroyed a life through abortion. My downward spiral began."

133. Many women stated in the affidavits and declarations that they had trouble bonding with subsequent children born after the abortion, and I have heard these reports from many of my own patients. In cases in which the baby is a distressing reminder of the abortion, in which the woman then develops an avoidance pattern of behavior to avoid the painful emotions, it is understandable that bonding problems could arise with subsequent children, which has been reported.

134. The declaration of Tammy Litchfield (NC; one of the 4200) states that "the trauma of the abortion did not present itself instantly. I eventually was unable to even look at babies, be involved with baby showers or anything that pertained to a birth of any kind.....Years later, when I did become a mother, I was very...unloving. I held myself back from my children.....I could not even enjoy the birth of my children. I went through the motions numb" (Exhibit C, Bates 1750-52).

135. **"Negative alterations in cognitions and mood associated with the traumatic event":** Symptoms of PTSD in this category can include a "persistent negative emotional state, which could be, for example, "fear, horror, anger, guilt or shame." The statements submitted by MKK (SD, Exhibit B-2, Bates 1711), Debbie Otto (MT, Exhibit B-2, Bates 1673), and CL (SD (Exhibit B-2, Bates 1715-16) (already quoted in part,

above) each specifically mentioned both shame and guilt. Considering the 96 statements, declarations and affidavits, from women of North Dakota, South Dakota, Minnesota and Montana, more than half specifically state they experienced either shame or guilt, or both. Fifty three women out of the 96, more than 50%, specifically used the word "shame," or the word "guilt," or both words in their statement. Many of the women additionally mentioned feelings of "self-loathing," "disgust" for themselves, "worthlessness," "disgrace," or similar words that may have represented shame, though I only counted "shame" when that specific word was stated by the woman. Likewise, one woman made the statement that it took her "years" to forgive herself, and others made similar statements that may have represented "guilt," but I tallied only the number of women who specifically used the exact word "guilt." So, at least 53% of the 96 women reported guilt or shame, and many more expressed what was very likely the same emotion using other words. See Exhibits B-1 and B-2.

136. The report of guilt and shame by so many women is particularly important since many studies have focused these two emotions after abortion. One study showed that "shame-proneness was positively correlated with PTSD symptom severity," that those experiencing shame have more severe PTSD symptoms (Leskela et al., 2002). Also, the effects of shame and guilt can be very disabling, can prevent women from seeking help, and may "impede emotional processing of the event" (Lee et al., 2001). One study found that guilt and shame 10 days after abortion predicted high PTSD avoidance scores two years later (Broen, et al. 2004).

137. However, although guilt and shame are uniquely associated with PTSD in some studies, nevertheless, the diagnostic criteria do not require guilt or shame. There are seven different types of symptoms listed under the heading of "negative alterations in cognitions and mood," one symptom being "persistent negative emotional state," which could include guilt or shame as above, but could include any negative emotional state. In the group of 96 affidavits and declarations, almost every woman expressed at least one or more negative emotion, with many listing several, including fear, anger, guilt, shame, grief, regret, sadness or sorrow, self-hatred, or feeling depressed and/or anxious. For almost all the women the negative emotions appeared to be very persistent over the years, and many women wrote that it was "life-long," that it "never went away," or in some cases they stated the number of years since the abortion and indicated that it had been ongoing for that number of years--for many of the women, for decades. See Exhibits B-1 and B-2.

138. Only two women (of the 96) did not name a clearly recognizable negative emotion, but one used the term "downward spiral" that persisted for six years after the abortion during which time she was engaged in "heavy drinking and promiscuous sex," while the other stated she had not known "that my baby would be ripped limb from limb" and she had not known that the consequences of abortion would be so long lasting--but she did not specify a particular emotion. Other than these two, each woman of the 96 did name one or more specific negative emotions.

139. Tammy Litchfield's declaration (NC; one of the 4200, also referenced above) described her emotional state as "continual emotional pain," "torment" and "self-

loathing" after her abortion from age 17 until age 31, until she "began my healing process" (Exhibit C, Bates 1750-52). She says she had angry outbursts that were "horrifying and cruel to those closest to me."

140. Some of the other symptoms of this category ("negative alterations in cognitions and mood") can include "persistent inability to experience positive emotions (e.g. inability to experience happiness... or loving feelings)" and "feelings of detachment or estrangement from others." Recall Tammy Litchfield (NC, above), describing herself as an unloving mother, and stating, "I could not even enjoy the birth of my children. I went through the motions numb" (Exhibit C, Bates 1750-52).

141. This sense of detachment and inability to experience loving feelings, which is a symptom of PTSD, contributes to the bonding problems with subsequent children that many women reported in the affidavits and declarations, and that many of my patients have reported to me during evaluation for psychiatric symptoms, problems and disorders that I have diagnosed as associated with their past abortion. There are also studies in the published literature showing increased bonding problems, increased child neglect, and increased child abuse after abortion.

142. Those women who experience distress in the presence of their children, as above, and at the same time, find themselves unable to enjoy their children and unable to have loving feelings, are experiencing bonding problems, and this is completely consistent with the reports of many women in the affidavits and declarations, the statements of many of my own patients who have had abortions and have subsequently had bonding problems with their living children, and the published research on bonding problems after

abortion (Coleman et al., 2002; Coleman, 2009). In addition, among those women who experience decreased bonding or attachment to their own children, and who find it distressing to have to care for their children, it follows that there is increased child abuse and neglect, which is shown in the published literature-- abortion is associated with increased child abuse and neglect (Ney et al., 1993; Coleman et al., 2005; Coleman et al., 2007). Child abuse and child neglect are not specifically symptoms of PTSD, but a sense of detachment and inability to experience loving feelings is a symptom of PTSD from which problems in the parent-child relationship and also problems in the husband-wife or couple relationship may arise, and according to published literature, problems in these relationships are increased in families in which an abortion has occurred in the past.

143. Also within this category of PTSD symptoms, "negative alterations of cognitions and mood," another of the possible symptoms listed is: "inability to remember an important aspect of the traumatic event(s)," which was expressed in *Clinician's Guide* (Baker et al., 1999) as "blocking out the experience." Even though as above, many women are bothered by intrusive memories about the abortion, when the experience is very severely traumatic and overwhelming to the person, there can be portions of the memories which are not accessible to the person—there can be gaps in the memory where certain portions of the experience are actually not able to be remembered.

144. **"Marked alterations in arousal and reactivity associated with the traumatic event(s)":** Symptoms of PTSD in this category include "reckless or self-destructive behavior," "irritable behavior or angry outbursts," "problems with concentration," or "sleep disturbance." As above, Terry Melby (ND – Exhibit B-1, Bates 1123-24) reported

engaging in "reckless, self-destructive behavior, drinking and driving with my kids in the car." Nine of the 96 women described their behavior as "self-destructive" or "reckless," using those exact words. (See Exhibit B-1 and B-2.) In addition, 18 of the 96 reported suicidal thoughts and behaviors, but only two reported actually making suicide attempts, so only these two were counted as "self-destructive" due to their reported self-destructive behavior, thus giving a total of 11 out of the 96 (11%) who could be counted as "self-destructive." (Others listed alcohol or substance abuse, promiscuity, eating disorders and behaviors that may have been self-destructive, but I have counted them as "self-destructive" only if they described themselves with the exact words "self-destructive" or "reckless" or reported an actual suicide attempt). However, it is not a requirement that a person have reckless or self-destructive behavior to be diagnosed with PTSD, as other arousal symptoms may be present instead, such as sleep disturbance or angry outbursts.

145. A study of medical records of 56,284 women with no known history of sleep problems revealed that women were more likely to be treated for sleep disorders after an abortion compared to childbirth (Coleman & Rue, 2006). The increased risk of sleep problems for the post-abortive women was highest during the first 6 months after the abortion, but persisted for four years. Women whose medical records showed prior history of sleep disorders were excluded from the study.

146. Problems with anger were reported by 15% of the 96 women. Exhibit B-1 and B-2.

147. In addition to the above symptoms of the various types, the disorder must persist for at least one month, and must cause clinically significant distress or impairment for the

diagnosis to be made. To meet criteria for the diagnosis the patient must have one or more symptom of intrusion and one or more symptom of avoidance, and two symptoms involving negative cognitions or mood, and two arousal symptoms. Thus, not every symptom must be experienced by every patient, but a specified number from each type of symptom (and for brevity, I have omitted listing some symptoms from the various categories).

148. From this review of the various symptoms of PTSD along with examples from the affidavits and declarations, and from the published research, one can see that a significant number of women do report these symptoms after abortion, and I have treated many women who report these symptoms to me after abortion. I have evaluated and treated many patients who met the diagnostic criteria for PTSD, patients who reported symptoms and problems that they attributed to a past abortion, whom I diagnosed as having PTSD arising from their past abortion, using the criteria in use at the time. However, on review of some of the cases I have treated, they would also have met criteria for PTSD under the recently revised criteria for PTSD. The patients in my own practice who met criteria for PTSD arising from their past abortion(s) reported symptoms and problems similar to the symptoms and problems reported in the affidavits and declarations from which I have quoted only a few representative examples.

149. Based on the foregoing, I conclude and it is my opinion, to a reasonable degree of medical and scientific certainty, that it is very common for women to have symptoms of PTSD arising from an abortion , and that a significant number of women do meet full criteria for PTSD after abortion. In addition, many other women have some symptoms of

PTSD after abortion, even though in some cases not meeting all the criteria. As we will see below, even "subthreshold PTSD," also called "partial PTSD," is a significant clinical problem and a source of distress and disability for many who have these symptoms. My opinion is further supported by the published research discussed below.

(F) High risk of PTSD after abortion in published literature

150. Sharain Suliman, a psychologist, and co-authors who included psychiatrists, a psychologist, and an anesthesiologist, conducted an important analysis of PTSD after abortion (2007). The concept for this study originated with an anesthesiologist, Dr. Labuschgne, who provided anesthesia for abortions (Sharain Suliman, personal communication, November 18, 2013). The study took place at a private abortion clinic and at a hospital that provides abortions, with the cooperation of these facilities. This was not a study by researchers known for a pro-life perspective. The research team was aware of published literature on PTSD after abortion, and wanted to find out if one type of anesthesia or another could lead to better outcomes in regard to reducing occurrence of PTSD following abortion.

151. This was a prospective study in which actual abortion patients were given seven psychological tests at the abortion facility immediately before and after the abortion on the day of the abortion. In addition, blood was taken to check for cortisol levels. (Cortisol levels are affected in a unique way when PTSD is present -- Auxier & Runyan, 2012). Some studies of PTSD have used interviews or old records to look back at a past abortion, but there are few if any comparable studies of PTSD after abortion in which immediate data was collected at the abortion facility, with administration of multiple

psychological tests (not just questionnaires) before and after the abortion, on the day of the abortion and at one month and three months follow up.

152. In the introductory section of the published article, Suliman et al. (2007) discussed published literature showing that some women develop PTSD or PTSD symptoms after abortion, for example, a study of first trimester abortion patients in which some women reported nightmares, flashbacks, and unwanted thoughts related to the abortion (Slade, et al., 1998). Suliman et al. (2007) also cited research showing that simply "being conscious during surgery is a traumatic event that may result in developing chronic PTSD" (Osterman, et al., 1998).

153. In this discussion, Suliman et al. (2007) considered possible causes of PTSD after abortion. "Seeing the foetus may be traumatic," (Suliman et al., citing Urquart & Templeton, 1991), "while awareness or consciousness during experiences of blood, pain and death (of the foetus) have also been associated with PTSD-type symptoms (Suliman et al., citing Slade et al., 1998).

154. Suliman et al. (2007) conducted a study comparing two types of anesthesia to determine whether one type of anesthesia or another could reduce the risk of PTSD. But the type of anesthesia made no difference in terms of long-term outcome. At three months after abortion, 18.2% of the women were diagnosed as having PTSD. Suliman et al. concluded: "High rates of PTSD characterize women who have undergone surgical abortions (almost one fifth of the sample meet criteria for PTSD)....."

155. Suliman's results were similar to the results of other previous studies. For example, a study by Barnard (1990) found 18.8% of post-abortive women met criteria for

PTSD 3 to 5 years after abortion with an additional higher percentage of those women having some symptoms of PTSD (without meeting criteria for full PTSD), such as 39% reporting sleep disturbance and 45% having flashbacks).

156. Suliman et al. noted that rate of PTSD in their study was intermediate between the rate of 14.3% reported by Rue et al. (2004) after abortion, and 25% (at one month after pregnancy loss) reported by Englehard et al. (2001). The study by Englehard et al. was of women who had miscarriages, not abortion, but "the results indicate that pregnancy loss is potentially traumatic, putting women at risk of developing PTSD."

157. Broen et al. (2005) compared women after elective abortion (within first 12 weeks of pregnancy) and women after miscarriage, administering tests 10 days after abortion or miscarriage, and again at 6 months, 2 years, and 5 years. A clinical interview and several tests were used, including the Impact of Event Scale (IES) which is well-established as reliable to distinguish between traumatized vs. non-traumatized groups, and which measures symptoms of PTSD. The study design did not include assigning any diagnosis to any study participant, but simply compared the scores on the various measurements.

The results were statistically significant. Both the abortion group and the miscarriage group had symptoms of PTSD, but both groups differed from each other in several ways.

158. In this study (Broen et al., 2005), women who had abortions had high scores for avoidance on the IES, and the scores stayed "almost unchanged throughout the five years." At each time of measurement, the abortion group had higher avoidance scores and also higher anxiety scores than the miscarriage group. At each measurement, the

abortion group also showed significantly lower quality of life, from 10 days through 5 years, compared to the miscarriage group.

159. Regarding PTSD "intrusion" symptoms, the miscarriage group started out with higher scores compared to the abortion group (though both groups had elevated intrusion symptoms). But the miscarriage group completely recovered by two years, while the abortion group also had some intrusion symptoms that persisted even at 5 years (Broen et al., 2005).

160. One other difference between groups was that the abortion group had higher scores for shame and guilt, and also for relief, compared to the miscarriage group (Broen, et al., 2005). This is of particular interest since various studies over the years have shown "relief" after abortion, particularly studies conducted soon after the abortion. In this study, even though "relief" was measured in the abortion group, the abortion group also had many PTSD symptoms as above, as well as guilt and shame, demonstrating that "relief" can coexist with negative emotions and even with symptoms of PTSD.

161. It has been widely reported and communicated to patients that many women experience relief after abortion, in a way that gives many women hope that the abortion will be a positive experience. MMP (MN) in her affidavit, in response to the question, "Were you adequately informed of the consequences of abortion?" stated, "I thought the only consequence would be tremendous relief and freedom from worry" (Exhibit B-2, Bates 1588). Other women made similar statements within the affidavits and declarations, that they had expected to feel relief, but did not. MMP states, in answer to the question, "How has your abortion affected you?" stated that she experienced "extreme

isolation, depression, anxiety, grief for someone who should be alive but is not because of my 'choice.'" She didn't mention relief at all, though she had expected to feel relief, and I don't recall seeing "relief" reported in any of the affidavits or declarations, but a number of studies have shown that relief can coexist with other very negative emotions or symptoms (Broen et al., 2005).

162. A study comparing Russian and American women who had previously had abortions (Rue et al., 2004) showed that both groups had high scores on a test that reliably measures trauma symptoms, the TSI Beliefs Scale. The average score for the Russian women was 276 and for the American women the score was 260, with both scores indicating significant trauma. As a point of reference, in a previous study of battered women in the U.S., the average score on this test was 242.

163. Further, 77.9% of American women reported "guilt" associated with the abortion (Rue et al., 2004).

164. Very few women reported benefits of the abortion, with only 0.3% of the Russian women and 0.9% of the American women saying they "felt better" after the abortion, only 2.2% of Russian women and 0.9% of American women saying their relationship with their partner improved after abortion (Rue et al., 2004).

165. Using the American Psychiatric Association diagnostic criteria for PTSD, Rue et al. (2004) found 14.3% of post-abortive American women met full criteria for PTSD, but 65% reported some symptoms of PTSD, for example, 47% reported unwanted memories of the abortion, 50% avoided thinking or talking about abortion, and 25% had difficulty

being near babies (with many other symptoms being reported, too many to list here), even though only 14.3% fully met the criteria to be diagnosed with PTSD.

166. The condition of having some symptoms of PTSD without meeting all criteria has been termed "subthreshold PTSD," also referred to in the literature as "partial PTSD" or as "PTSS" (posttraumatic stress symptoms) (Lundell, et al., 2013). Even though only "partial," this condition is associated with "substantial disability and suicidal risk." In a study by Marshall (2001), higher numbers of subthreshold PTSD symptoms were associated with greater impairment, comorbidity, and suicidal ideation.

167. A large U.S. government study, The National Vietnam Veterans' Readjustment Study, was conducted in the 1980's due to a Congressional mandate to investigate PTSD in Vietnam veterans. (Price, 2007; Kulka et al, 1988; Kulka et al., 1990a; Kulka et al., 1990b;). The study results indicated that 15.2% of male and 8.5% of female Vietnam theater veterans met full diagnostic criteria for PTSD at the time of original study (Price, 2007; Schlenger, et al., 1992). Considering female Vietnam veterans who had "high levels of war-zone exposure," 17.5% met full criteria for PTSD at the time of the original study (Kulka et al., 1988; Price; Schlenger). However, an additional percentage of men and women had "partial PTSD," which was also considered a serious clinical problem (Kulka et al., 1988; Price; Weiss, et al., 1992). Kulka et al. (1988) stated that those with partial PTSD suffered from "impairments in function" and were "seriously affected by PTSD" and in need of treatment, even though not meeting full criteria for PTSD. This is analogous to the findings of Barnard (1990) and Rue et al. (2004) that some women who experience trauma associated with abortion develop full PTSD while an additional

percentage experience some symptoms of PTSD, "partial PTSD," which is an important clinical problem requiring attention. In regard to partial PTSD after pregnancy loss, Englehard et al. (2001) concluded that even when PTSD symptoms do not meet full criteria for PTSD, symptoms may still impair quality of life.

168. In addition, a follow-up study on the veterans discovered that a high percentage of those with PTSD or partial PTSD had failed to improve after many years, with 78% of those with PTSD continuing to experience PTSD symptoms 20-25 years after Vietnam (Price, 2007; Schnurr, et al., 2003). Kulka et al., the original authors of the study in 1988, stated at that time that PTSD is a "chronic, rather than acute, disorder," meaning, it is a long-term disorder, but the follow up study showed it was much longer term than anyone had realized in the 1980's (Price, 2007).

169. This is consistent with other research showing that PTSD can be very long lasting over a lifetime. A major U.S. study of PTSD, the National Comorbidity Study, demonstrated that "more than one third of people with posttraumatic stress disorder fail to recover even after many years." (Kessler, 1995). Other studies have shown that the duration of PTSD can span an entire lifetime (Yehuda et al., 1995; Port et al., 2001; Schnurr et al. 2002).

170. A 2005 study by Kersting et al. is pertinent in regard to the long-lasting nature of PTSD and also grief in women having abortions. Kersting et al. administered psychological tests to 83 women after abortion, including the Perinatal Grief Scale which "is a tried-and-tested" measurement for grief associated with perinatal losses including abortion, and the Impact of Event Scale, Revised, which is well established as a reliable

test for PTSD symptoms. Kersting et al. administered these tests at 14 days after the abortion, and again 2 to 7 years after the abortion. It was expected that grief and trauma symptoms would have decreased over the 2 to 7 year period, but that was not the case. Comparing trauma symptoms in each of the three categories (avoidance, intrusion and hyperarousal symptoms), there was no significant difference between the trauma symptoms at 14 days compared to the trauma symptoms at 2 to 7 years. The trauma scores were significantly higher in the abortion group compared to a group of women who delivered healthy babies. Similar results were obtained for grief, with four out five of the subscales showing no significant difference, with only one subscale having decreased significantly. Kersting et al. concluded: "The results indicate that termination of pregnancy is to be seen as an emotionally traumatic major life event which leads to severe posttraumatic stress response and intense grief reactions that are still detectable some years later."

171. An important finding of the follow-up study of Vietnam veterans is that many veterans had "delayed onset" of PTSD, which is defined as onset of PTSD occurring 6 months or more after a traumatic event (Schnurr et al., 2003). Of veterans with PTSD, almost 40% reported that their PTSD symptoms started 2 or more years after Vietnam. Almost one third of veterans with PTSD experienced their symptoms starting between 2 to 5 years after Vietnam, and a "late onset cluster" experienced the start of PTSD symptoms on average 6 years after Vietnam, and up to 22 years after Vietnam. Delayed onset is "common" with PTSD, and various studies of PTSD have shown from 22% to 70% of PTSD patients having had delayed onset (Schnurr et al., 2002).

172. In my clinical experience, I have evaluated and treated many individual women who had delayed onset of PTSD symptoms which originated several years after the abortion, and this is clearly consistent with the published literature on PTSD. As with the case of Mary (Shuping, 2011; Shuping & Gacek 2010) who held a miscarried unborn child in her hand, some women who do not have PTSD symptoms immediately may at a later time hear a baby's heartbeat or see an ultrasound image during a subsequent intended pregnancy and at that time come to understand the abortion as the death of their child, and then develop PTSD symptoms arising from that experience.

173. It is well-established in the trauma literature that all trauma is cumulative—each new traumatic stress continues to add to the burden of trauma carried by a person (Neuner et al., 2004; Mollica et al., 1998). If a person has some symptoms of trauma but not enough to meet diagnostic criteria for posttraumatic stress disorder, later additional trauma may cause symptoms to worsen or new symptoms to develop so that the person later meets criteria for diagnosis. This may explain why women who have already experienced past abuse or unresolved trauma are known to be at increased risk for problems after abortion (Baker et al., 1999; Baker & Beresford, 2009; Speckhard & Rue, 1992), since the trauma of the abortion is additive to the effects of the earlier trauma.

174. PTSD is a serious condition that is frequently is a cause of disability and is also associated with many other health problems. A 2007 study by Sareen et al. showed PTSD is associated with chronic pain conditions, cardiovascular diseases, respiratory disease, gastrointestinal illnesses, also suicide attempts, poor quality of life, and both short- and long-term disability. PTSD is predictive of poor general health (Lauterbach, 2005).

(G) PTSD Rates after Abortion are Likely Higher than Studies Reflect

175. There are several reasons that the true rate of PTSD for women who have had an abortion is higher than reflected in the literature. One reason is that many studies are considering only the "current" prevalence of PTSD at one point in time, whether that may be one week after abortion, or three months after abortion, not considering the number of cases that may arise at a later time which would indicate the "lifetime prevalence" of PTSD, which would be a larger number than "current" prevalence. Additionally, because of distress associated with recalling the abortion which is a symptom of PTSD and because of avoidance symptoms of PTSD, many women choose not to participate in research studies related to abortion, or may drop out later due to the distress they experience. Thus, many studies greatly underestimate the true prevalence of mental health disorders after abortion, including PTSD. It is also important to realize that these same factors also cause underestimation of other mental illnesses and disorders that occur after abortion.

176. In studying the prevalence of any disorder, one can examine "current prevalence," or lifetime prevalence. With the Vietnam veterans, in the original study (Kulka et al., 1988) it was stated that the "current" percentage of men with full PTSD at the time of the study was 15.2%, meaning that 15.2% of Vietnam veterans had PTSD at that time. But the total "lifetime prevalence" for men, referring to how many male veterans had ever had PTSD in their entire life after entering Vietnam was 30.9%. As an example, suppose a veteran developed PTSD in 1970 and still had PTSD currently at the time of the study. He would be counted as a "current case." But suppose another man developed PTSD and

had completely recovered by 1980. He would be counted in the "lifetime prevalence" category because he had PTSD in his life even though not currently, and the man who currently had symptoms would also be counted in the lifetime prevalence rate. "Lifetime prevalence" in this study included any veteran who ever had PTSD after entering Vietnam including past cases and current cases. The lifetime prevalence is higher than the current prevalence.

177. Looking at data for women veterans, although the "current" prevalence was 8.5% for full PTSD, the lifetime prevalence for full PTSD was much higher, 26.9%, which was comparable to lifetime prevalence for male veterans (Kulka et al., 1988).

178. Similarly for partial PTSD, the original current prevalence for men was 11.1% and lifetime prevalence was 22.5%. For partial PTSD the original current prevalence for women was 7.8% but lifetime prevalence was 26.9%. Any time one determines the lifetime prevalence for PTSD, it would be expected to be higher than the "current" prevalence (Kulka et al., 1988).

179. Considering the study by Suliman et al., wherein psychological tests were given after the abortion and at one and three months, 18.2% was the "current" prevalence for PTSD within the first three months after abortion. But we have already discussed that many cases may not develop until later, for example, when the woman has her first intended pregnancy or her first miscarriage, or when there is some other trigger. Some women do have symptoms immediately or soon after the abortion, as Suliman et al. reported, but some women can be expected to develop PTSD at different points in time

and the lifetime prevalence for PTSD would be higher than what can be determined at any one point in time.

180. Considering that the majority of the veterans with full PTSD had delayed onset after more than 6 months, with 40% first meeting criteria for the diagnosis 2 to 5 years after Vietnam, also considering the "late onset" cluster with PTSD being diagnosed at 6 years to 22 years after Vietnam (Schnurr et al., 2003), studies looking for PTSD in the first three months after abortion would be expected to find a lesser number of cases compared to the number of cases that would emerge over a longer follow up period. It is possible that at three months, the current cases in Suliman's study may represent a minority of those who would eventually develop PTSD, or at any rate, it is very likely that a significant number of additional cases of PTSD would be discovered later if the study could have continued for a much longer duration.

181. However, it is often extremely difficult to conduct studies with longer follow -up periods, because there are usually more dropouts over increased length of time. Study participants may move to new addresses or drop out for various reasons, and dropouts are one of the other reasons it is difficult to get a complete picture of the number of women being impacted by PTSD (or by any of the other mental health problems associated with abortion). The fact that many studies of women's mental health after abortion are short term or do not consider lifetime prevalence is a deficiency that is difficult to avoid. These studies are very likely to identify a lower percentage of women affected by abortion if the study is not designed to consider lifetime prevalence of PTSD.

182. The next problem is the problem of non-participation by women in studies, whether by initially refusing to participate, or by dropping out. As we have already discussed, avoidance is a symptom of PTSD, and many women with PTSD do not want to talk about their abortions. Many women in the affidavits and declarations stated that they did not want to talk about the abortion, and some said they had difficulty even saying the word "abortion."

183. A number of authors over a period of decades have concluded that the more severely distressed women have a greater likelihood of dropping out of a study or not participating in the first place. Adler (1976) reviewed 17 studies of women after abortion, and found attrition rates ranging from 13% to 86%. Adler concluded: "Results support the suggestion that women for whom the abortion was more stressful are less likely to be represented in the final sample."

184. Wilmoth et al. in 1992 stated, "The available evidence strongly indicates that these women who refused to participate or who did not provide follow up data were different from those who did in ways that most likely would increase the prevalence rate of negative psychological responses."

185. Ruth Ruch (ND – Exhibit B-1, Bates 1121-22) stated that after her abortion, "For the next 3 weeks of my life, I drank alcohol until I passed out...I hated myself for what I had done." Her distress persisted for many years and she eventually did obtain counseling, about 14 years later, but for many years, "it was a secret I swore I would keep until I died." Ms. Ruch does not report having been invited to participate in a study, but this gives an example of what some women are doing and how they are feeling after their

abortion. Women in this much distress are very unlikely to participate in an abortion follow up study. In my clinical experience, many women have reported severe distress such as this following their abortion, and many women have also reported to me having used alcohol abuse and substance abuse as a way to cope with their distress (and increased substance abuse after abortion is also demonstrated in published research such as Coleman, 2005; Coleman et al., 2005b; Morrissey & Schuckit, 1978; Reardon & Ney, 2000; Reardon, Coleman, Cougle, 2004).

186. Weisaeth (1989) did a very useful study that demonstrates how non-participation can be due to trauma, and which shows how a high percentage of non-participation can hugely distort a study's findings. In this study, 246 employees were exposed to an industrial disaster. In this study, "resistance" was measured by counting the number of contacts required in order to get the person to come in to participate in an evaluation. Employees were repeatedly contacted until they agreed and came for the evaluation, so that ultimately, there was 100% participation. But it was found that the employees who had been exposed to the highest degree of trauma in the disaster were the ones who had the highest resistance to participating (24.2% resistance in the high trauma group), those with intermediate exposure to trauma had an intermediate resistance to participating (6.8%), and those who had the least exposure to the trauma had the least resistance (4.2%). After gaining 100% participation and conducting the assessments, it was found that if the initial refusals had been accepted, the researchers would have lost 42% of the PTSD cases, and would have lost 64% of the most severe PTSD cases. (The persistent contacting that was done with employees after the disaster is obviously not an acceptable

method to use with abortion patients, who prefer not to participate in a study, or who change their mind and drop out, but it is likely that the non-participants in abortion studies are likewise the most traumatized, and this suggests the magnitude of the effect of this disproportionate resistance or refusal by those who are most traumatized.)

187. Returning to the study by Suliman et al. (2007), the dropout rate was high, with only 37% of the original sample continuing through the entire study. It is extremely likely that a disproportionate percentage of women with PTSD dropped out, and also extremely likely that those who dropped out were experiencing a higher degree of trauma symptoms compared to those who continued in the study. Therefore, although Suliman et al. found 18.2% of women in the study experiencing PTSD at three months, and considered that "high," in reality had it been possible to retain the dropouts, it's quite likely the percentage may have been much higher than the original number, and higher still if it were possible to continue the study for a much longer time to include women who experience delayed onset. The exact prevalence cannot be known with certainty, but it is extremely likely to have been higher than what was found.

188. A study by Coleman et al. (2010) did overcome some of the limitations in a study that appears to more effectively capture the lifetime prevalence data and that appears to allow a greater comfort level for highly traumatized individuals to participate. This study used online surveys to gather data on 374 women who had experienced either a first trimester abortion (up to 12 weeks) or a 2nd or 3rd trimester (13 weeks or later). The results showed that "52.5% and 67.4% in the early and late abortion groups, respectively, met the DSM-IV symptom criteria, a considerably higher percentage than in earlier

published reports." Coleman suggested a number of reasons for these results being so much higher.

189. "First, for this particular sample of women, a great deal of time had elapsed since the abortion (an average of 15 years) and the symptoms could conceivably have developed later in this extended time frame" (Coleman et al., 2010). Some women may have initially experienced the abortion as a trauma but did not develop PTSD until additional trauma was experienced at a later time (for example, a later miscarriage), due to the cumulative effects of trauma. As has been seen with the veterans study (Schnurr, 2003), some people do develop PTSD symptoms years after the initial trauma, and for some women, the PTSD symptoms do not arise until later, when the woman hears a heartbeat or sees an ultrasound image in a later intended pregnancy, or when she in some other way experiences the aborted child as her own child who died in the abortion.

190. In the study by Coleman et al. (2010) the wording of the survey asked women to identify symptoms that occurred at any time after the abortion that were attributed to the abortion. This allowed women to endorse symptoms they may have experienced in the past even though they may not currently be experiencing that symptom.

This study was essentially collecting data on the lifetime prevalence of PTSD after abortion, rather than merely a current prevalence rate. It potentially provides a clearer picture of how many women were impacted in total over a longer period of time, though identifying a higher percentage of women affected by PTSD compared to studies only considering current prevalence.

191. Additionally, this sample (Coleman et al. 2010) "was characterized by high rates of exposure to potentially traumatizing physical and sexual abuse in childhood and adulthood," which are predisposing factors that are known to increase the risk of mental health problems after abortion (Baker et al., 1999; Baker & Beresford, 2009).

It should be noted that childhood sexual abuse has been experienced by 25% of U.S. women, (Pereda, 2009; Centers for Disease Control and Prevention, 2013). This is a common problem that would have an effect on many women who have abortions. In Coleman's study, 32% had a history of childhood sexual abuse, 7% higher than the national prevalence, thus while this may have had some impact, it would not explain the large difference in PTSD found in this study compared to other previous studies. Similarly, a history of childhood physical abuse was seen in 36% of Coleman's sample, while the national prevalence for history of childhood physical abuse in adult women is 27% (Centers for Disease Control and Prevention, 2013). Coleman's sample is 9% higher than the national average. Thus, Coleman's sample appears to have been more highly traumatized prior to the abortion though it does not appear that this would fully account for the very high rate of PTSD in Coleman's study (Coleman et al., 2010).

192. Coleman et al. (2010) discuss that in this sample, "more than a quarter of the current sample had experienced more than one abortion and the effects may have been cumulative." It is very likely some women who had multiple abortions experienced cumulative effects from past abortions, since it is well established that the effects of trauma are cumulative, and there is abundant literature that women having multiple abortions are at increased risk for mental health problems. However, in this sample only

26.6% of the women had more than one abortion; Guttmacher Institute reports that nationally in U.S., 48% of abortion patients are having repeat abortions (only 28% for North Dakota women). Thus, in this study, the higher rate PTSD would not be due to the percentage of women having repeat abortions.

193. An important factor with this study was that the data were collected anonymously, online, so that women who had been more negatively affected may have felt more willing to participate in this study compared to the usual response rate for the more severely affected women. In my opinion, it is possible that this study is simply identifying a true lifetime prevalence rate by using a format that is more comfortable for the participation of the more traumatized women who would otherwise not participate, but it's also possible that the study included a disproportionate number of women with PTSD due to the method used. While in many studies there is legitimate reason for concern that cases of PTSD are being missed due to dropouts, in this study there is the concern that highly traumatized individuals may have been disproportionately represented, and the results could be higher than would have been seen in a representative sample. This is not a randomized sample, and it is possible that this study over-estimates the lifetime prevalence of PTSD after abortion.

194. A 2013 PTSD study by Curley and Johnston is also worth considering. These researchers recruited students with a past history of abortion and students who had never been pregnant for a comparison group. Of the 151 female students, 89 had a history of past abortion an average of 3 years previously (range, one month to 10 years). Surprisingly, *all* the students in the abortion group reported symptoms of PTSD and grief

lasting on average three years. For some, the effects were still very severe. For example, one woman enrolled in the study, but then became so distressed while completing the form that she felt it necessary to drop out of the study. Five students were referred to university psychiatric services either due to expressing suicidal thoughts, or due to their responses on a psychological test indicating depression or suicidal thoughts. "Twelve students requested and were referred for psychological follow up services to address the abortion at the time of the interview." (Curley & Johnston, 2013).

195. Part of the study involved determining how many of the post-abortive women desired to receive "psychological follow up services, which are not typically offered within healthcare, to address distress after their abortion." More than 50% of the students with a past abortion desired psychological follow-up services. The authors note that "a 50% incidence of persistent distress after abortion is significantly higher than 30 to 40 % that was previously thought." In their introduction, they had stated that "young women under age 25 years are at highest risk for developing mental health problems after abortions," citing literature that reported up to 40% of women in this age group have mental health problems after abortion.

196. Results of several tests including the Impact of Events Scale showed that the group that preferred treatment had moderate to severe PTSD symptoms indicative of partial or full PTSD, while the group that did not prefer treatment also had lingering symptoms of PTSD though less severe. The authors concluded: "It is evident that, among university women, the psychological impact of having an abortion may be more severe and of longer duration than was previously estimated."

197. It is not possible to design the perfect study that will provide the exact prevalence of PTSD after abortion because of the nature of PTSD. It is an intrinsic feature of PTSD to experience distress when confronted with reminders of the trauma, such as occurred with the woman who could not complete the questionnaire (Curley & Johnston, 2013), and it is intrinsically part of the disorder to avoid those painful reminders that would cause distress, as has so often occurred when women drop out of studies intended to measure the psychological effects of abortion. Considering that it can be distressing for some even to complete a questionnaire (Curley & Johnston, 2013), one can appreciate the problem of obtaining the needed data. It's also quite possible that other women on the campuses where Curley and Johnston recruited had even more severe PTSD symptoms and chose not to volunteer for the study due to greater severity of symptoms and greater avoidance symptoms in particular, but there is no way to obtain that information.

198. It is not possible for any researcher to state with certainty the prevalence for PTSD associated with abortion. The true prevalence of PTSD associated with abortion is underestimated in the literature due to the various factors discussed, including the fact that many patients have delayed onset, and many of the most traumatized women decline to participate in studies or drop out later. Additionally, many avoid treatment out of shame (which will be discussed further below) and thus do not show up in analyses of medical records. No one can produce an accurate figure as to exactly how many women are impacted by PTSD after abortion (which is not the only adverse psychological reaction to abortion, though it is a very important one because it is very long lasting and has so many affects in every aspect of a woman's life). However, published studies are

increasingly utilizing better methods and are recognizing the long-term, chronic course that is typical of PTSD including PTSD after abortion, and with each study, we obtain additional information. It is essential to understand, as discussed above, that studies will unavoidably underestimate the number of women impacted, but certainly, good studies are identifying significant numbers of women with severe symptoms, and there is no question that many women are affected. The lifetime prevalence for full PTSD in American women, from all causes, is 10.4% (Kessler et al., 1995). Even though it is not possible to state with certainty the exact lifetime prevalence of PTSD or PTSD symptoms after abortion, it is definitively known that women who abort are at a significantly increased risk for PTSD compared to women who do not abort.

(H) Conclusions Regarding PTSD

199. Based on the foregoing, and based on my clinical experience, and from my review of the literature on PTSD, which is not limited to the studies cited here, it is my opinion to a reasonable degree of medical and scientific certainty, that many women experience enduring, severe, psychological distress from PTSD (whether full PTSD or partial PTSD) caused by and associated with past abortion(s). Whether full PTSD or partial PTSD, the PTSD symptoms have a very long-term, adverse effect on the health and the quality of life of the women, and frequently have an adverse effect on their ability to bond to their living children, and often prevent them from enjoying their living children, as well as adversely impacting their relationship with their spouse or partner. Considering women who have had abortions, it is my opinion that many women develop symptoms of PTSD after abortion and many women, who do not originally experience symptoms of PTSD,

experience delayed onset of PTSD, sometimes several years after the abortion, often during a subsequent intended pregnancy, which prevents them from enjoying the happiness that they expected from the intended pregnancy and childbirth subsequent to the abortion. PTSD is typically a serious, chronic, long-term condition, and these symptoms frequently persist for decades, very often for a lifetime. Many women experience severe distress at the loss of companionship and loss of enjoyment of the relationship with the unborn child, and experience severe distress in recalling the death of their unborn child, and their role in that death. Severe shame often prevents women from talking about the abortion to anyone, and prevents the most traumatized from seeking counseling, making it much less likely that they will recover from the effects of the abortion(s). Full PTSD and partial PTSD are both clinically important problems occurring after abortion and having an adverse effect on the women affected and also having an adverse effect on society, since either can be a cause of disability. In the practice of psychiatry, I have treated many patients who are disabled by PTSD, and it is a condition that is disabling for many patients. Many women meet full criteria for PTSD at some time during their lifetime after abortion, and many other women will also experience distress from subthreshold PTSD. Therefore, in my opinion HB 1456 protects women from these adverse effects of an abortion and in turn promotes the health, safety and well-being of women, along with protecting the life of unborn children and the health and well-being of their families, and is medically and scientifically sound and reasonable.

200. Limiting abortion to the period of time before the heartbeat is detectable, as set forth in HB 1456 will decrease the risks that result from abortion – indeed the statements and declarations of women that have had abortion demonstrate this.

201. Recall the statement of Carrie Sanchez (SD) who said, concerning an intended pregnancy after her abortion: "I heard the baby's heartbeat and began to cry. These were not tears of joy. Exhibit B-2, Bates 1719-23. I instantly thought that I had killed a heartbeat just like that 9 years ago."

202. Jody Clemens (ND) (Exhibit B-1 Bates 1119-1120), who reported experiencing isolation, shame and despair after her abortion, states that after she married, "I became pregnant again, and only then learned that 21 days after conception, that my baby's heart was beating. That meant there was new blood circulating through new veins in a new little human being... Why wasn't I provided with this information when I had my abortion?... Had I known the truth that my baby's heart was beating at the time of the abortion I would never have gone through with the procedure. A beating heart means there is life. My baby was alive—he may have been small but he was very much alive. If this law had been in effect for me, I would not have suffered the irreparable injury I have."

203. Ms. Clemens's statement is one of many women who express that they wish they had not had the abortion, and that they emphatically would not have desired the abortion had they known of the presence of the heartbeat.

204. Rhonda Nygaard (ND) (Exhibit B-1, Bates 1127) stated, "If I had been told the truth about the development of my baby--that he...had a heartbeat at 6 weeks--I would never have gone through my abortion."

205. Terry Melby (Exhibit B-1 ND, Bates 1123-24) was previously quoted concerning her reaction to her abortion, which included drinking and driving with her children in the car, and a suicide attempt within one month of the abortion. She states "if I had just been told the truth, that the baby was formed and had a heartbeat, I would not have gone through with the abortion. The child would be 32 years old now."

(I) PTSD Not Comparable to Post-Partum Depression

206. Sometimes questions are raised as to whether PTSD after abortion might in some way be comparable or analogous to post-partum depression. But these are very different conditions. Post-partum depression typically arises soon after birth primarily due to hormonal changes. This is most frequently treated with antidepressant medication, and in the cases I have treated, there has been improvement within about two weeks. The time course for post-partum depression is typically weeks, not decades as I have often seen with PTSD after abortion, and as reported in some of the affidavits and declarations, and as demonstrated in the research (above). Many of the women who have come to me for help with PTSD symptoms have not sought treatment earlier or have failed to respond to previous treatment and in either case, are coming to me for help after experiencing many years of PTSD symptoms, but I have never seen any patient in their 50's or 60's coming in for treatment of postpartum depression. The patients I have treated for post-partum depression have started treatment soon after childbirth and have responded to treatment

quickly, within weeks, and do not have lingering symptoms decades later. As we have seen, PTSD can continue for many years, even for a lifetime.

207. Di Scalea and Wisner (2009) reviewed 7 studies of prevention and 13 studies of treatment for postpartum depression. Treatment with antidepressant medication is effective for both prevention and treatment, and additionally, studies have also shown "robust and rapid response" with use of hormone treatment. Hilgers (2004) reports very rapid response with use of injectable progesterone treatment, with 95% effectiveness, and with symptoms beginning to improve within hours. This is in contrast to PTSD which often "fails to improve after many years" (Kessler, 1995) and which can persist for one's entire life (Port et al., 2001; Schnurr et al. 2002; Yehuda et al., 1995);).

208. Postpartum psychosis is a more serious disorder than postpartum depression, occurring in only 1 or 2 pregnancies per 1,000. Of women suffering from postpartum psychosis a small percentage, up to 4% may attempt infanticide, and up to 5% suicide (Hilgers, 2006). This disorder is believed to be a form of bipolar disorder, and fortunately, there are a number of effective medications from which the physician can choose that can give a "quick, full recovery," and "prevention of future episodes" (Sit et al., 2006).

209. My opinion regarding postpartum depression is, to reasonable degree of medical and scientific certainty, that it is very unlike PTSD, in that postpartum depression is of much shorter duration and much more easily treatable than PTSD. They are not comparable or analogous conditions.

(J) Women with history of abortion are at increased risk for postpartum depression

210. A 2013 study by Giannandrea et al. (2013) revealed that women with a history of pregnancy loss (abortion, miscarriage, or stillbirth) are at increased risk for postpartum depression and for PTSD after the birth of a child, and those with multiple losses are at even higher risk (Giannandrea et al., 2013). For those women who may have already had partial PTSD due to prior trauma associated with the earlier pregnancy loss, aspects of the delivery process or baby itself may function as a reminder of the previous trauma and cause symptoms to worsen, becoming full PTSD, or these same "reminders" may serve as a stress that precipitates the onset of postpartum depression. Giannandrea concludes: "Although the clinician, and even the patient, may not see a pregnancy loss as significant, this study indicates it could add to her traumatic burden, making her more vulnerable to clinically significant distress at the time of another pregnancy and birth." Giannandrea states that even though "a woman may not have sought mental health treatment at the time of her loss or termination, or believes herself fully recovered," nevertheless she is still at increased risk for mental health complications during a future pregnancy if she has the history of prior loss.

211. In addition, a new study was published during November, 2013, showed that "fear of childbirth predicts postpartum depression (Räisänen et al., 2013). Fear of childbirth can be a symptom of PTSD associated with abortion. In this study, data show that women who had previous abortion have 41% higher risk of postpartum depression. However in this study, there is no increased risk of postpartum depression after miscarriage.

212. Based on the foregoing, considering the results of these two excellent new studies, also based on the body of trauma literature, and my clinical experience, it is my opinion to a reasonable degree of medical and scientific certainty that abortion places a woman at risk of developing postpartum depression or PTSD in subsequent pregnancies. In the previous discussion of the PTSD symptoms with examples, we have considered examples in which women saw an unborn child, heard a heartbeat or held their baby from an intended pregnancy and through that experience became more aware of the unborn child they had lost to abortion. Some women, at that point in time, come to think of the abortion as the death of their baby, and may then develop PTSD symptoms. Alternatively, they may develop severe grief at that time which can include symptoms of depression. The specific degree of risk cannot be known precisely with certainty, and I would not give an opinion only on the basis of two studies, but in this case, the two studies are completely consistent with my clinical experience and with the manner in which PTSD develops. The provisions of HB 1456 will serve to reduce this risk by limiting abortions to the period before the heartbeat is present, which will decrease PTSD symptoms and adverse psychological reactions that may arise from the abortion during subsequent pregnancies.

(K) Additional Risk Factors for Increased Risk of Mental Health Problems after an Abortion

213. I have previously considered a list of risk factors from *Comprehensive Abortion Care*, a textbook of the National Abortion Federation, and have discussed at length one of these risk factors, "commitment and attachment to the pregnancy." See Paragraphs 46 to 96 above. As identified earlier in this report at Paragraph 44 a – o, there are many

different risk factors which can place a woman at increased risk for mental health, emotional and psychological problems after abortion. As noted, a woman that has one of these risk factors, in turn has an increased risk of having mental health problems after abortion. I would like to review a few of these now and then draw some conclusions about risk factors.

214. **Pressured, Coerced and Forced Abortion (Abortion of Wanted Babies)** This topic concerns the risk factor of "perceived coercion to have the abortion," another risk factor that in my opinion is equally important. (Baker & Beresford, 2009; Baker et al., 1999). The 2008 A.P.A. Report (American Psychological Association, 2008) identified "pressure to abort" as a risk factor for mental health problems after abortion. The Council on Scientific Affairs of the American Medical Association (1992) has also identified pressure or coercion as a risk factor. Researchers and experts on both sides agree that pressure, coercion, and even "perceived coercion" (the woman's perception that she is being coerced, whether or not observers agree with the woman's assessment of her situation) place the woman at increased risk for mental health problems after abortion. (Reardon, 2003-2004; Rue et al., 2008; Rue & Speckhard, 1992; Speckhard & Rue, 1992). See also Exhibit D of the Coleman Report which lists 13 studies showing that "Coercion or Pressure from Others to Abort" is a risk factor for increased mental health problems after abortion.

215. According to one definition, coercion involves "intimidation" to "compel the individual to do some act against his or her will" which may be "by the use of psychological pressure, physical force, or threats." (The Free Dictionary). Thus, coercion

may involve "psychological pressure" though in some cases physical force or threats are used to compel the woman to obtain an abortion against her will.

216. For an adolescent or a young adult, if the parents or other adults "insisted" on the abortion, this could serve as psychological pressure that would make it very difficult or even impossible for the young woman to refuse the abortion. The following gives an example of a woman from South Dakota, who had an abortion due to pressure from her boyfriend's mother, and perceived pressure from her own parents. In the end, at the clinic, she changed her mind about going forward with the abortion and said so to the nurse, but her expressed wishes were not honored.

217. Carrie Sanchez (SD) had an abortion in 1995 and signed an affidavit in South Dakota in 2005, 20 years later (Exhibit B-2, Bates 1719-23). Ms. Sanchez was a college student and very much wanted to carry the pregnancy to term. But her boyfriend's mother "insisted" that she should have an abortion, while the boyfriend and his father said nothing. Later, her own parents said they would support her decision, but "it was clear... what they wanted," which was for her to have the abortion. She stated, "My mother took me to a clinic...to have the procedure. I was not doing this for myself. I did not want to have an abortion. As I sat in a waiting room with other women who were having an abortion, the feeling grew stronger in me that I did not want to do this. I made up my mind. Forget the papers I had signed, not even sure what they were. When they came for me (I was next) I would just tell them I did not want to do it, they would show me to my clothes and I would leave. Wrong!! I told the nurse I had changed my mind. She said let's go in and talk to the 'Doctor.'" But Ms. Sanchez says that as soon as she sat down to

talk with the doctor, she was being stuck with a needle (either by the doctor or the nurse), and apparently received a strong sedative or anesthetic. She woke up in the Recovery Room with the abortion already completed. A nurse asked if she could get her anything. Carrie reported, "I first asked if it was done and she simply said, 'yes.' I told her yes you can get a gun for me."

218. Ms. Sanchez has continued to experience attachment to her aborted child and to experience distress associated with the abortion. She stated, "Every time I see my friend's son who is now 10 years old I am sadly reminded. It never goes away. I would rather look at my child and smile."

219. Ms. Sanchez said that after she was married and was again pregnant, "At my first ultrasound, I was exactly 8 weeks pregnant. I heard the baby's heartbeat and began to cry. These were not tears of joy. I instantly thought that I had killed a heartbeat just like that 9 years ago."

220. Another example comes from the affidavit of Deborah Schleif (MN) concerning her abortion in 1972 in California, where it was legal at that time (Exhibit B-2, Bates 1620-22). Her abortion was three days before her 16th birthday. She states, "When I first found out I was pregnant I was really scared. I was only 15 years old. It was a while before I told anyone. I told my mother first. She was upset, but I thought she would there for me. Next I told my father. He slammed his fist on the table and looked at me with such anger and disgust that I thought he could have killed me at that moment...Later that day my mother told me, 'Your father said that you either have to get an abortion or leave

this house.'" Then I told Michael the father of the baby. He wasn't happy about the baby. He wanted me to have an abortion, too. I wanted to have and keep the baby."

221. This is an important point about pressured, coerced and forced abortions: They are abortions of wanted babies. The mother wants the baby (unborn child) and others in her life do not support her desire but instead use psychological pressure and sometimes threats or physical force to secure the abortion. I have already discussed at great length the risk factor of aborting when the woman is "committed or attached to the pregnancy," and the evidence of how the woman is affected when prenatal bonding followed by abortion can give rise to PTSD. (See Paragraphs 46 to 212.) With a coerced or pressured abortion, the baby is typically wanted by the mother, as was reported by both Ms. Sanchez and Ms. Schleif, but the abortion of the wanted baby (though unplanned pregnancy) takes place due to the coercion or pressure from others. Because they are abortions of wanted babies, everything that has already been stated in regard to prenatal bonding and PTSD applies.

222. In the case of Ms. Schleif, she took the step of going to Social Services to apply for child welfare benefits, however, the father of the baby threatened to lie in court to say he was not the father, and he threatened that he would have some of his friends testify that she had slept with them, so that paternity could not be known (which apparently was before DNA testing was available). Because of the boyfriend's statements, she says that she did proceed with the abortion, against her wishes. "I know I did not want to do this and just before I went into the operating room the doctor asked me if I was sure I wanted to 'to do this.' I said, 'no, but I have to.' I cried."

223. She reports that following the abortion, she had fertility problems and was never able to have another child, despite fertility treatments. That was not necessarily a consequence of the abortion, but nonetheless, she has sadness that she aborted one child and was never able to have another. She experienced alcohol and drug abuse and a suicide attempt. She reports continued emotional pain that she thinks is hard for her current husband to understand. She still thinks about her aborted child and hopes that "one day in heaven, I will see my child." Thus, she has had difficult consequences from an abortion that she did not want and tried to avoid (by initially attempting to obtain child welfare benefits for her unborn child, but later feeling unable to withstand the pressure to abort).

224. If Ms. Schleif's situation occurred today in 2013, the baby's father would not be able to use that threat of perjury, since DNA testing to establish paternity is now widely available and most people are well aware of this. So that particular tactic is not likely to work today, but at the time, she was young and was receiving what was for her strong pressure. However, today, there are cases where the pressure can escalate to physical violence and even murder of women who refuse to abort; homicide is now the leading cause of death of pregnant women. (Curtis, 2003; Gazmararian et al., 1995; Hilberman & Hilgers et al., 1981; Horon & Cheng, 2001; McFarlane et al., 2002; Munson, 1977-78;).

225. There is a continuum of pressure that can range from the more subtle, such as Ms. Sanchez saying she knew what her parents wanted her to do, or the baby's father saying, "I will never love that baby," to parents threatening to cut off college funds, to the extreme of being sedated and restrained for a forced abortion. (Shuping, 2011).

226. Although some clinics now screen for coercion, many women tell me that they have felt pressured and they felt they had to say whatever was needed in order to obtain the abortion, though they didn't want the abortion at all. One woman told me her father had told her and the doctor that she was not to leave the clinic with a baby still on board (that he didn't want her to leave the clinic without having an abortion). Another woman told me recently, "I would have said whatever I had to." Screening may perhaps help to prevent some of this, but if the pressure is strong enough, due to threats of physical violence or threats of homelessness or threats withholding of financial support, women may not speak truthfully about their situation at the clinic. The reality is that wanted babies are being aborted, and women suffer when this happens.

227. No one knows the precise prevalence of this problem, but I know of many such cases from my own psychiatry practice. From the group of 96 affidavits and declarations, 45 women stated they were pressured when had their abortion, and many were pressured by more than one person, often several, including parents, the father of the baby, the father's parents, friends, and even clinic staff (counselor or nurse). Exhibit B-1 and B-2. The fact that 46% of this group report "pressure" is a partial explanation of why this group is experiencing very severe distress over so many years—they didn't want the abortion in the first place. This is also some indication that this is not a rare circumstance.

228. The 2004 study of Russian and American women revealed that 64% of the American women and 37.7% of the Russian women felt "pressured by others." It is important to note that this was not a pool of psychiatric patients, but women in a general gynecology practice who had a history of past abortion who had agreed to participate in

the study. Of these women, 64% of the American post-abortive women reported feeling "pressured by others."

229. The following article was written by me and I submit this as part of my expert opinion, marked as Exhibit E:

Shuping, M. (2011). Wantedness & coercion: Key factors in understanding women's mental health after abortion. *Association for Interdisciplinary Research in Values and Social Change Research Bulletin* 23(2), 1 - 8. Retrieved from:

<http://www.abortionresearch.us/images/Vol23No2.pdf>

This article gives additional background and explanation regarding the problem of wanted babies being aborted due to coercion and pressure, including some case examples and further analysis of this problem.

230. At Exhibit D of the Coleman Report, in addition to the bibliography of studies related to coerced abortions, there is a list of 18 studies related to the risk factor of "Commitment to the Pregnancy." These studies give additional evidence of the harmful effects of pressured, coerced, or forced abortions, since pressured, coerced, or forced abortions are in most cases a situation in which the woman was committed or attached to the unborn child or preferred to give birth, but due to pressure, she has the abortion instead. There is no question that researchers and professional organizations on both sides consider this a risk factor for increased mental health problems after abortion, but it often is not recognized what a large problem this truly is.

231. **Significant ambivalence about the abortion decision.** Another identified risk factor is "Significant ambivalence about the abortion decision." Many women in the

affidavits and declarations report ambivalence—wanting conflicting things at the same time, or having difficulty and distress at making the decision. Terry Melby of North Dakota (Exhibit B-1, Bates 1123-1124) stated that she "didn't want to have an abortion," but "started to think of abortion as my only option." There are many variations on this that can be seen in the different women's statements, but this is one example.

232. Putting great effort into keeping the abortion a secret for fear of stigma.

Another risk factor is "Putting great effort into keeping the abortion a secret for fear of stigma." One of the women stated in her affidavit or declaration that prior to the abortion she discussed with clinic personnel her concern that she did not want to have to tell her own personal physician, and clinic personnel told her she would not have to disclose this. Therefore, this woman did not tell even her own personal physician about the abortion. The woman did not disclose the abortion on medical forms, felt badly about the dishonesty, but felt too much shame even to disclose the abortion within her medical history when seeking treatment. It is a common theme among the affidavits and declarations that the women tell no one, or only a very "select few." Some women in their statements indicate they have withheld the information even from their spouse, and I have had patients whose husbands never were told. The results of one study (Layer et al., 2004) showed that the average person in an abortion recovery treatment program had told either two or fewer people, but some had told no one. Many women continue the secrecy for years, even decades or a lifetime, and this is partly why they fail to recover. But in examining pre-existing risk factors occurring prior to the abortion and predicting adverse consequences after the abortion, we are considering secrecy prior to or at the

time of the abortion as predictive of later problems. In this example, the woman had a concern about secrecy while talking to clinic staff before her abortion. They assured her she would not have to tell anyone, even her doctor(s). Many women spoke of the need for secrecy within the affidavits and declarations, and this is certainly true of a large percentage of my own patients, although I do not have specific data from my practice for this well-documented risk factor that is also acknowledged in the 2008 APA Report (American Psychological Association Task Force on Mental Health and Abortion, 2008).

233. **Advanced stage of pregnancy.** Another risk factor is the “Advanced stage of pregnancy.” Not only the *Clinician’s Guide* (Baker & Beresford, 2009), but also The 2008 APA Report (American Psychological Association, 2008) and other sources recognize that abortions beyond the first trimester carry a higher risk of mental health problems. Based on data from the Guttmacher Institute, this represents about 144,000 abortions in the U.S. annually. Possibly there is higher risk of problems due to longer time period in which bonding can occur, and greater opportunity for feeling fetal movements prior to the abortion, which would enhance awareness of the unborn child as a unique individual and thus contribute to a greater possibility of trauma if abortion occurs. Similarly, there is higher risk of a coerced abortion in these later abortions, since the woman may have tried to conceal the pregnancy or avoid an abortion, but when parents or partner discovered the pregnancy, there was pressure that eventually led to abortion. Likewise, ambivalence may have been present and delayed a decision; ambivalence would represent an additional risk factor, but with late abortions there can be several inter-related risk factors. While the majority of women submitting affidavits

and declarations did have first trimester abortions, some reported having had an abortion beyond the first trimester.

234. **“Preexisting experience of trauma” and “Past or present sexual, physical or emotional abuse.”** Other identified risk factors are “Preexisting experience of trauma,” and also “Past or present sexual, physical, or emotional abuse.” These are similar risk factors, in that any past trauma can predispose toward a higher risk of PTSD when additional trauma occurs. Thus, women who have had prior sexual abuse, rape, or other experience of trauma are more vulnerable to experiencing adverse mental health consequences of abortion, including but not limited to PTSD. Further below is a separate section regarding this particular type of risk. (Paragraphs 244-275)

235. **“Intense guilt and shame before the abortion.”** Within the affidavits and declarations, there is so much shame and guilt expressed, but now sometimes decades later, it would be difficult to say how much was present originally and how much came later. These are common experiences and some women identify a specific recollection of shame or guilt prior to the abortion. For example, Ruth Ruch of North Dakota (Exhibit B-1, Bates 1121-22), stated that immediately before her abortion, when the doctor came in, she was sobbing uncontrollably. The doctor asked what was wrong and, "I told him I couldn't go through with it--that I was Catholic." This may indicate that she was feeling some guilt, or some moral conflict about the abortion, and in fact, she said she "couldn't go through with it." But she states the doctor responded, "It's okay--I'm Catholic, too." She said nothing further and the abortion was completed. (This example reminds me of an example from the abortion provider textbook, further below, in which it is suggested

that a response to crying is to hand the woman a Kleenex and move on, which is similar to what Ruth Ruch experienced). Certainly many women in the affidavits and declarations report guilt and shame after the abortion, but some express clearly that there was guilt at the beginning, such as having a memory of praying at the abortion that God would forgive them for what they were about to do, or a sense of guilt at knowing they were violating their own conscience. Some studies rather than looking at "guilt and shame" prior to the abortion, have also identified "acting against one's own conscience" or against one's own beliefs or values as being a risk factor for increased mental health problems later, and that is seen in some of the affidavits and declarations.

236. **Existing emotional disorder or mental illness prior to the abortion.** Another risk factor is "An existing emotional disorder or mental illness prior to the abortion." This is a risk factor which is thought by many to be the strongest predictor for later problems, and certainly those who already have mental health problems do have an increased risk of mental health problems after the abortion, which may be an exacerbation of the original problem or additional new problems. Certainly, MKK (SD – Exhibit B-2, Bates 1711) reported having been receiving treatment with a psychologist prior to her abortion, and then had years of severe mental suffering later, though she was too ashamed to seek further counseling. Others reported pre-existing eating disorders or pre-existing addiction problems or other mental health problems that worsened after the abortion, though the majority of women who submitted affidavits and declarations did not report prior problems. Baker et al. (1999) is clear that even though it is a risk factor,

that women with pre-existing mental health problems are certainly at increased risk, some women have problems who have no prior mental health history.

237. **Belief that abortion is the same act as killing a newborn infant.** Another risk factor is “Belief that abortion is the same act as killing a newborn infant.” It is hard to tell after the fact how many women believed this at the time of the abortion, versus how many believe this now. Many women who submitted affidavits and declarations clearly believe this now, but less so originally. But this is worth mentioning since there is an example related to this in the section further below on counseling. The abortion provider textbook gives a suggestion as to how to handle a situation in which a woman expresses this belief prior to the abortion. Unfortunately, even though this belief is a known risk factor listed in the textbook, the suggested response to learning that a patient has this belief did not include a discussion with the patient concerning this belief as being a known risk factor.

238. **Risk Factors in the APA 2008 Report.** (American Psychological Association Task Force on Mental Health and Abortion, 2008). This report actually identified 17 risk factors that identify subgroups of women at increased risk for mental health problems after abortion. Many of them are the same risk factors or very similar to those already considered, such as: terminating a pregnancy that is wanted or meaningful, feelings of commitment to the pregnancy, perceived pressure from others to terminate a pregnancy, history of mental health problems prior to the pregnancy, ambivalence about the abortion decision; perceived need for secrecy; late term abortion (abortions beyond the first trimester are associated with greater risk of mental health problems), history of prior

abortion, being an adolescent (not an adult), having a non-elective "therapeutic" abortion, history of prior abortion, lack of perceived social support from others, feelings of stigma, and a few others. As can be seen, most of these have already been considered, and the APA 2008 Report (American Psychological Association Task Force on Mental Health and Abortion) lends additional support, while also reporting on some other well established risk factors, such as the risks associated with later abortions beyond 12 weeks, which Baker & Beresford (2009) had not listed, and repeat abortions also constituting a risk factor.

239. On reviewing the group of 96 affidavits and declarations, I observed that a majority of women who submitted statements included reference to one or more risk factors. Exhibit B-1 and B-2. The questionnaire did not specifically ask them about the various possible risk factors, other than one question asking whether or not the woman was pressured by anyone to have an abortion, and if so, who pressured her. As noted already, 46 women of the 96 reported being pressured, so these women were clearly at increased risk for problems after abortion. But 11 had experienced multiple abortions which is a risk factor, and a number of women reported ambivalence, high need for secrecy, young age under 21, and others at age 21-22 which is still at increased risk, several late abortions beyond the first trimester, though the majority were first trimester, a number expressing lack of emotional and support, and being very isolated, and several reported acting against their own beliefs. The forms were not designed to elicit risk factors that pre-dated the abortion, but on reading women's stories it was possible to identify that a woman was very conflicted about her decision, that another had a very

high need for secrecy and so on, so that appears that the majority had one or sometimes multiple risk factors operating and it is not surprising that so many of them report such severe lifelong symptoms. The reality is that their stories are similar to many women who choose abortion, and some of the same risk factors can be identified in some of the Red River Women's Clinic patients' statements also. Many of these are commonly experienced among women seeking abortions.

240. Looking also into some of the other risk categories such as secrecy, ambivalence, acting against one's own beliefs, shame or guilt—these are common among women. It is well established they are risk factors, but it is not known with certainty how many women fall into each category. But from the frequency of these risk factors, it is clear that many women are at risk for increased problems after abortion.

(L) Understanding Risk Factors and Mental Health after Abortion

241. Many parents tell their children, "Don't smoke cigarettes, you'll get cancer." That is not strictly true, because my father smoked for 30 years and he did not die of lung cancer. Not everyone develops lung cancer from smoking cigarettes. In fact, smoking cigarettes increases the chances of getting lung cancer and a whole host of other illnesses, from emphysema, to chronic obstructive pulmonary disease, to heart disease, and a number of other very serious illnesses in addition to lung cancer. Some people smoke for years and perhaps do not develop any of these illnesses, but very clearly, research shows that smokers are much more at risk, not just lung cancer, but for a host of illnesses. Similarly, abortion does not automatically cause all women to have PTSD, or to commit

suicide, to develop addiction problems or sleep disorder, but it does increase their risk for all these problems, according to the best research.

242. I am speaking of risk in two different ways here, because first we considered that women in one category or another have pre-existing "risk factors" through which they experience increased risk if they have the abortion—if they have bonded to their baby, they are at increased risk, if they are pressured they are at increased risk etc. But what they are at risk of getting as a result would be a range of mental health, emotional and psychological problems. Being in a risk category does not guarantee that the woman will have mental health, emotional or psychological problems after abortion, but having one or more risk factors means that a woman is at "increased risk" to develop a problem after the abortion.

(M) Conclusions Regarding Risk Factors and Mental Health after Abortion.

243. To a reasonable degree of medical and scientific certainty, it is my opinion that abortion is a substantial contributing factor and cause in increasing the risk of mental health, emotional, and psychological problems for women that have had an abortion. The overwhelming preponderance of medical and scientific evidence demonstrates abortion is a substantial contributing factor in women's mental health, emotional and psychological problems. Risk factor research identifies subgroups of women at increased risk, but the presence of risk factors is ubiquitous, that most women would fall into one or more categories and thus experience some increased risk. Overall, the overwhelming preponderance of medical and scientific evidence demonstrates that abortion is a

substantial contributing factor and associated with and causes an increased risk of women's mental health, emotional and psychological problems.

(N) **Rape and Incest.**

244. As we have seen in the list of risk factors from the abortion provider textbook (Baker & Beresford, 2009), if a woman has had past or present sexual, physical or emotional abuse, or a prior experience of trauma, she is at risk for increased mental health problems after abortion. Contrary to popular belief, there is no basis to assume that most women would desire or benefit from an abortion in this situation.

245. The book *Victims and Victors* reports on a comprehensive analysis of reports from 192 women who had become pregnant through sexual assault, 164 by rape and 28 by incest (Reardon et al., 2000).

246. “Of the 164 women who became pregnant as a result of rape, 73 percent carried the pregnancy to term, 26 percent carried the pregnancy to term, and 2 percent had miscarriages” (Reardon et al., 2000).

247. Of those pregnant rape victims who aborted, 93% “said that abortion had not been a good solution to their problems, and stated they would not recommend it to others in their situation” (Reardon et al., 2000).

248. The authors note that “19 of the 44 rape victims who aborted (43 percent) indicated that they felt pressured or strongly directed by family or health care workers to choose an abortion (Reardon et al., 2000). For these women the desire to abort did not originate from within themselves, but was instead a concession to the suggestions or demands of others.” The authors quote a number of women (in some cases using real

names, and when anonymity was requested, using pseudonyms), but the four below are representative examples:

249. “I was 22 weeks pregnant and had decided I really wanted to keep my baby. But I felt a tremendous pressure from all sides—especially to please my parents—and I finally gave in” (Reardon et al. 2000).

250. “I went to Rape Crisis and they offered to pay for the abortion. There was no alternative from them, the clinic, or even the few friends who knew [about the rape]. I chose abortion thinking it was really the only solution” (Reardon et al. 2000).

251. “Basically my friend took me by the hand and led me to the clinic where there was no discussion about alternatives, just an appointment made for me...” (Reardon et al. 2000).

252. “My parents were embarrassed about the pregnancy and insisted I have an abortion...” (Reardon et al. 2000).

253. These statements from four of the women in this study who became pregnant from the rape and then aborted do not indicate that they desired abortion. Rather, these statements indicate pressure from others, particularly parents, and also lack of exploration of options and a lack of information. Following the abortion, many women reported severe distress associated with the abortion which persisted for years, and which many reported to be more “far-reaching” than the effects of the rape.

254. Debbie Enstad (her real name), who was raped while a college student, experienced drug and alcohol abuse, suicide attempts, a failed marriage, and another abortion. She said, “I tried for years to drown the guilt and pain I felt in drugs and alcohol

But it got to the point where there weren't enough drugs...to dull the pain" (Reardon et al., 2000).

255. Helene Evans (her real name) was date raped while in college, became pregnant and aborted. She said, "Abortion does not help or solve a problem—it only compounds and creates another trauma for the already grieving victim by taking away the one thing that can bring joy." Discussing the period immediately after the abortion, Helene stated, "After the abortion, I wanted to die. How could I live when I had just ended the life of my child? The negative feelings resulting from the rape were not eliminated by the abortion....the grief was now doubled. I became severely depressed and suicidal." With the passage of time, Helene reported, "I no longer have negative feelings about the rape.....It is the abortion that I still struggle with on a daily basis. It is difficult for me, when I see a child, not to wonder what mine would have looked like" (Reardon et al., 2000).

256. Patricia Ryan (pseudonym) became pregnant after being drugged and raped, then obtained an abortion at the urging of Planned Parenthood. She said, "The effects of the abortion are much more far-reaching than the effects of the rape in my life" (Reardon et al., 2000).

257. Rebecca Morris (pseudonym) was raped at age 15 and became pregnant, having an abortion at her mother's urging. Rebecca said, "They say abortion is the easy way out, the best thing for everyone. But they are wrong. It has been over 15 years and I still suffer" (Reardon et al., 2000).

258. The women I have known who have had abortions following rape have experienced lengthy, severe, adverse mental health, emotional and psychological consequences, which is consistent with research and consistent with these statements and similar statements quoted in *Victims and Victors* (Reardon et al., 2000).

259. In contrast to the women who aborted, the majority of pregnant rape victims who carried to term "explicitly expressed happiness that they had chosen to give birth to their child. *None* of the women stated they did not want their child or wish that they had chosen abortion instead" (Reardon et al., 2000). This is what I have observed with patients who have been sexual assault victims who have become pregnant and carried to term.

260. Mary Murray (real name) said, "I thank God for the strength He gave me to go through the bad times and for all of the joy in the good times. I will never regret that I chose to give life to my daughter" (Reardon et al., 2000).

261. Kathleen DeZeeuw (real name) had originally considered aborting her child conceived from rape, but decided to carry to term. She reports on the bonding that she experienced with her son as the pregnancy progressed: "Once the baby continued to kick and move, I began to have different feelings toward the child. I began to realize that this little life inside me was struggling too. Somehow, my heart changed." She reports maternal feelings after her son was born: "I can't begin to explain the very strong maternal feelings I had for my son. This little one had come from my womb. He's fought hard to get this far.....We were *both* victims of this assault" (Reardon et al., 2000).

262. In this same study, of the 28 women who became pregnant through incest, 50 percent carried the pregnancy to term (with some children placed for adoption and others raised by family members or the birth mother) and 50 percent had abortions (Reardon et al., 2000).

263. The decision to abort was not the choice of the young women. "None of these women reported having any input into the decision. Each was simply expected to comply with the choice of others." (In most cases, the girl's parents or the perpetrator made the decision and made the arrangements for the abortion.) In some cases, "the abortion was carried out over the objections of the girl who clearly told others that she wanted to give birth to her child" (Reardon et al., 2000).

264. "Of the 14 incest victims who had abortions, eleven explicitly stated that the abortion was not a good solution and they would not recommend it to others" (Reardon et al., 2000).

265. Edith Young (real name) was 12 years old when she became pregnant as a result of rape by her stepfather. At age 37, she stated, "The abortion which was to 'be in my best interest' just has not been. As far as I can tell, it only 'saved their reputations,' ... and allowed their lives to go merrily on.....My daughter, how I miss her so. I miss her regardless of the reason for her conception." She reported years of severe emotional distress that she attributed to the abortion, and many painful physical problems such as chronic infections of tubes, ovaries and bladder." She said "Twenty-five years have gone by but the consequences of the abortion are still going on" (Reardon et al., 2000).

266. Carla Harris (pseudonym) became pregnant at age 15 as a result of sexual abuse, and the stepfather told her abortion was her only option. As an adult, married with one child, she stated, “The memories of the abortion itself are horrible, but even more painful is the fact that I killed a child...I have often wondered what my child would be like today if I hadn’t had an abortion” (Reardon et al., 2000).

267. In contrast, of the 14 incest victims who carried to term, all were happy that they had been able to carry to term” (Reardon et al., 2000).

268. Considering both rape and incest victims together, of the 133 sexual assault victims who carried to term, *not one* expressed regret concerning their choice to give birth, and *not one* expressed “a wish that they had chosen abortion instead” (Reardon et al., 2000). More than 80 percent of this combined group “explicitly expressed happiness that they had chosen to give birth to their child.”

269. Dr. Sandra Makhorn is a rape counselor whose earlier research results were similar to Reardon’s. In a study of 37 pregnant rape victims, she found that 28 women chose to carry the pregnancy, five chose abortion, and four had unknown outcomes. Thus, at least 75% or possibly up to 85% chose to carry to term—evidence against the widely held assumption that most rape victims desire abortion. (Mahkorn, 1979).

270. Dr. Makhorn’s work also showed that the majority of women who carried to term had improved self-image and a positive view of the child by the time of delivery. She concluded that “pregnancy need not impede the victim’s resolution of the trauma,” rather, with adequate support “healthy emotional and psychological responses are possible.” She recommended that it was important to focus on ways of supporting women through their

pregnancies rather than taking the approach that “abortion is the best solution” (Makhorn & Dolan, 1981).

271. There is no published literature giving evidence that abortion improves psychological outcomes for women who become pregnant as a result of sexual assault.

272. We have already considered that women who are victims of sexual assault are at risk for having increased mental health problems after abortion, as stated in the textbook *Comprehensive Abortion Care* (Baker & Beresford, 2009). But other risk factors may additionally be present. For example, as we have seen, some of the women reported they felt “pressured” to abort, and “perceived coercion” is a known risk factor for increased mental health problems after abortion (Baker et al. 1999; Baker & Beresford, 2009; American Psychological Association Task Force on Mental Health and Abortion, 2008; Priscilla Coleman expert report, Exhibit D).

273. For a woman still an adolescent or a young adult, as was the case with many of the women in Reardon’s study at the time of the sexual assault, if the parents “insisted” on the abortion, or if the perpetrator made the abortion decision, it would likely be very difficult or in many cases impossible for the young woman to refuse the abortion. Thus, a number of women from the study appear to have been experiencing coercion or pressure which is an additional, separate established risk factor for mental health problems after abortion, as reported in *Comprehensive Abortion Care* (Baker & Beresford, 2009), the APA 2008 report, and in other sources. In addition, adolescence is itself a risk factor, so multiple risk factors may be present in young women who have been sexually abused or raped, placing them at much higher risk of mental health problems after abortion.

274. Among women I know who have had abortion after rape or after sexual abuse, some have said that the abortion was more difficult for them than the rape or sexual abuse, and they have experienced distress associated with their abortion. There are few studies of women who have been raped or who have experience sexual abuse in which there has been a comparison of women who aborted vs. women who carried a pregnancy to term. However, it has been seen that there are no proven mental health benefits associated with abortion at Paragraphs 18-23 above, and there are no proven mental health benefits established for the subgroup of women who have been sexually abused or raped. The reports by Reardon et al (2000) and by Mahkorn (1979) and by Mahkorn & Dolan (1981) are consistent with what I have observed with my own patients. Due to the fact that prior sexual abuse or prior trauma have been shown to be risk factors for increased mental health problems, I would have to conclude that abortion is more harmful than helpful to women who have been sexually abused, raped or otherwise traumatized. In addition, aside from abortion risk factor research, it is known that the effects of trauma are cumulative, and when trauma occurs after previous trauma, there is greater risk of PTSD. Thus, those who have had previous trauma are generally at increased risk for mental health problems after abortion, but they are particularly at risk for developing PTSD. Thus, prevention of abortion for this group of women would be protective for their mental health.

275. Based on the foregoing, to a reasonable degree of medical and scientific certainty, my opinion is that when women have been raped, or have been victims of sexual abuse or sexual assault, or when women have been victims of trauma, they are at increased risk of

mental health problems after abortion, and they are at increased risk of developing PTSD after abortion. Thus, any reduction of abortion for this group of women will serve to reduce their risk of mental health problems by preventing the risk of abortion being added to the trauma they have already experienced. The limitation of abortion to that early period of development before heartbeat occurs will be protective of women's mental health due to abortion taking place at an earlier time period before heartbeat occurs and/or by reducing the occurrence of abortions.

(O) Failure of Counseling before and after Abortion.

276. I have already quoted portions from the affidavit of MKK (SD). Exhibit B-2, Bates 1711. She reported 27 years of "mental anguish" including the "pain of losing my child," and "the guilt and shame of what I had done." However, she states "to this day, I have only told a select few. I have had no formal counseling because I am too ashamed." She points out there is danger in women not obtaining help while inside they "still carry the wounds and scars of killing their child."

277. MKK goes on to say she avoided formal counseling because of her shame, and there is published research that indicates that shame, which is especially associated with PTSD, often keeps people from seeking help they need (Lee et al., 2001). It was also observed with the Vietnam veterans (Price, 2007) that many who needed treatment avoided it and did not seek treatment.

278. Patty Miller (SD) says, "I was so ashamed that I never talked about it with anyone, even the father, whom I later married...." Exhibit B-2, Bates 1740-41. She reports that finally, 30 years later, she did go through a counseling program which was

helpful. However, she says the negative thoughts and behaviors have absorbed half her lifetime, and that the price has been too high.

279. Shame is a very important factor in keeping women from seeking help. In my private practice, for some years, I advertised that I offered treatment for various "women's issues" including abortion issues as well as several other types of problems of special concern to women. One woman came to me seeking psychiatric help for anxiety and depression, and I treated her for two years before she finally told me that she really came because she wanted to talk to me about her past abortion. She said she had seen that ad in the phone book which is why she had chosen me, but she was too ashamed to tell me about the abortion. This gives an idea of how powerful the shame can be. I had been unsuccessfully treating her anxiety and depression with various medications for all that time, not knowing that she was struggling with memories and emotions associated with her past abortion.

280. As I have already discussed, "avoidance" is a symptom of PTSD, and of partial PTSD, and women who experienced trauma associated with abortion would be unlikely to seek counseling because of avoidance that is an intrinsic part of PTSD. They are in distress, but they fear that seeking treatment will cause even more distress, because of the necessity of revisiting the abortion experience. Many of the women who submitted affidavits and declarations stated they avoided talking about the abortion, and some said they could not even bring themselves to say the word abortion. Recall that one of the university students in the study by Curley and Johnston (2013) became so distressed when she tried to complete a questionnaire that she had to drop out of the study. For all

these women, it would be very difficult for them to go to a counselor for help, not only because of the shame, which is powerful, but because of the symptoms of avoidance, and because of the distress they experience when they do encounter reminders of the abortion. Thus many keep their secret and try to forget. There is great hesitation to talk about the abortion, but the fact that many cannot even speak of it, which is part of the illness, prevents or limits the possibility of recovery.

281. However, in addition to the shame and avoidance, there are some factors related to women's experiences with counseling at the abortion clinic that create barriers to seeking mental health treatment after abortion. Indeed, these factors in many cases prevent women who have had an abortion from obtaining the necessary and important mental health treatment they need after they have had an abortion.

282. The webpage of the National Board of Certified Counselors (NBCC) states the following: "All states in the US license professional counselors. The state counselor licensure boards administer the application processes and procedures that have been established by law in each state." In every state in the U.S. there is a licensing process for counselors.

283. In the state of North Dakota, the North Dakota Board of Counselor Examiners is responsible for the licensure of counselors who are required to have a Master's degree, which is usual for counselors in every state. See N.D.C.C. Chapter 43-47.

284. However, Dr. Warren Hern, M.D., a founding member of the National Abortion Federation, and author of an abortion textbook that is still in use, states that "there are no formal qualifications for being an abortion counselor. We have found it helpful for

prospective counselors to have a college or graduate background in the social sciences, but we have specifically avoided requirements for professional qualifications *per se*. Personal qualities are much more important."

285. It is interesting to consider that in every state in the United States there is a requirement that counselors be licensed, and the usual requirement for licensure is a Master's Degree and completion of the NBCC exam with a high enough score to meet state requirements. See N.D.C.C. § 43-47-06. But Dr. Hern views the personal qualifications as being more important for abortion counseling, with no specific academic preparation necessary for abortion counseling.

286. The personal characteristics that Hern thinks are important are that the counselor "convey warmth," and "it is important that she be a generally happy person," with "a sense of humor," who is able to "get along with others," and who has "an ability to cope with stress." As far as knowledge and skills he notes, "it is important that a prospective counselor either be well-informed about abortion in its medical, social, and political aspects or be interested in learning about it." The political aspects of abortion are apparently more important than graduate study in the actual skills of counseling.

287. Considering that abortion clinic employees provide "counseling" for which no graduate education in counseling is required, there exists a deficiency because the abortion industry has its own set of rules, while the patient's expectations and the licensing statutes, like North Dakota, have a different set of expectations, needs and requirements.

288. In my clinical experience, patients have reported that when they arrived at the abortion clinic, they desired help with decision-making regarding their pregnancy and were still looking for options. However, because abortion clinics do not provide counseling by licensed counselors, these expectations were not met. For example, Ruth Ruch of North Dakota (Exhibit B-1, Bates 1121-22) stated, "Once I was at the abortion facility, when asked why I wanted the abortion, I told them simply, I had no other choice. I wished someone would have said—yes, you do have options, and here they are. Instead, I was told I was doing the right thing. But in my mind, I was still screaming for other options."

289. The experiences reported by my patients, and the experience of Ms. Ruch are consistent with published research. For example, in one study, (Rue et al. 2004) 79% of post-abortive women reported they were not counseled on alternatives, and 84% believed they had not received adequate counseling, with only 10.8% reporting that they considered that the counseling they received was "adequate."

290. This mismatch in expectations between the abortion patients and the clinic staff appears to originate with the National Abortion Federation. The *2013 Clinical Policy Guidelines* of the National Abortion Federation list several standards for "counseling" but no standards regarding skills, training, education or licensure for those providing the counseling (National Abortion Federation, 2013), thus providing for what is called "counseling" without use of personnel who are defined as counselors under North Dakota state law (See N.D.C.C. § 43-47-06).

291. These guidelines (National Abortion Federation, 2013) list four references regarding counseling at the abortion clinic. One is the chapter by Baker et al. (1999) in the abortion provider textbook *Clinician's Guide*, that has the National Abortion Federation logo on the cover. In the first paragraph of the chapter on counseling in the second sentence, the authors state: "The preabortion counseling session allows the patient to review her decision before taking action, identify emotions, manage those that provoke anxiety, and receive information necessary to give informed consent for the procedure."

292. Notice, the first thing that is said in that sentence is "review her decision," which would seem to indicate that the decision is already made, and she is just going to run through it one more time before taking action. There is nothing there about weighing options, getting additional information and sorting things through to make sure she makes the decision that is best for her.

293. The textbook also points out that the primary, immediate benefits of effective abortion counseling are a more pleasant and positive patient-provider relationship and a less painful abortion procedure, though secondarily, the authors point out that "unresolved conflicts may surface later, sometimes months or even years after the abortion," while, "patients who address their emotional conflicts in a timely fashion experience fewer emotional difficulties later." But as one reads through the chapter, it does appear that the primary focus is on helping the woman to have a good abortion experience that day, and to get the abortion taken care of expeditiously, not to help the woman with her decision making process. In fact, that is one of the standards listed in the

National Abortion Federation's 2013 Clinical Policy Guidelines: "A patient must undergo the abortion as expeditiously as possible in accordance with good medical practice."

294. Many women desire help in thinking things through, but the clinic is programmed to move things along expeditiously, with counseling to a large extent a formality to get the informed consent forms signed, and to make sure the woman is prepared so that she can get through the abortion process with a minimum of difficulty.

295. In the textbook (Baker et al., 1999), there is some discussion of the counselor trying to identify those patients who have significant ambivalence or emotional distress, but most clinics, like Red River Women's Clinic, do not have professional counseling staff, only personnel who are called counselors, but who are not counselors, and who may not have the skills to assess ambivalence or other risk factors. Indeed, the deposition testimony of Dr. Eggleston and Tammi Kromenaker illustrate the failure to provide adequate counseling.

296. For example, Dr. Eggleston testified at her November 26, 2013 deposition that with respect to surgical abortions, she is in the room with the patient for approximately 15 minutes and in that brief period of time, she asks whether the patient wants to have an abortion to assess whether there is coercion and performs the procedure itself. See Eggleston Deposition, pp. 50-52, pp. 70-72. This time in the examination room is the first time Dr. Eggleston will have even met the woman. Eggleston Deposition, p. 60. Once Dr. Eggleston completes the abortion, she leaves the examination room where this procedure occurred and unless there is some problem, she does not see the patient again. See Eggleston Deposition, pp. 72-73. In fact, Dr. Eggleston explained that 1-2% of the

surgical abortion patients ever return and it is not for any counseling. Eggleston Deposition, p. 62. Dr. Eggleston stated that unless the women encounters a problem, the only follow-up for medication abortions is only to perform a vaginal ultrasound to make sure the unborn child has actually "passed" but if anything "unusual" happens that the patient is given a phone number to call the Clinic. Eggleston Deposition, pp. 68-69. Dr. Eggleston confirmed the Red River Clinic has no counselors to assist women, but instead it has what she described as a patient educator. Eggleston Deposition, pp. 62-63. In a candid description of the Red River Clinic, Dr. Eggleston, in responding to what follow-up care is provided or even offered to the women who have abortions through the Red River Clinic, testified "our clinic is mainly an abortion clinic and so those appointments are few and far between." Eggleston Deposition, p. 60. In summary, Dr. Eggleston, by her own admission spends no more than 15 minutes of time with a woman and provides little, if any, counseling before the procedure and nothing afterward.

297. Likewise, the testimony of Tammi Kromenaker at her November 26, 2013 deposition illustrates the failure to provide adequate counseling, and failure to recognize the need for counseling that may include "options counseling" and exploration of the woman's unique circumstances and needs. First, Tammi Kromenaker in her November 26, 2013 deposition stated the women's decision to abort had already been made when a simple phone call is made to their clinic: "I would assume that somebody calling and saying I would like to make an appointment for an abortion has made that decision that that is her intention." Kromenaker Deposition, pp. 46-47. This is simply not the case because as explained, women do wish to explore options other than abortion, even when

present at the clinic that may perform the abortion. In addition, there are no licensed counselors on staff at the Red River Women's Clinic and no other licensed mental health professional on staff--no psychiatrist, no psychologist, though at some unspecified time in the past decade Red River Women's Clinic did have a licensed counselor on staff. Kromenaker Deposition, pp. 28- 29. Ms. Kromenaker testified that she herself has a bachelor's degree in social work but that she is no longer licensed as a social worker (page 9-10).

298. From my own experience in earning a B.S. in Psychology from the Honors College at Michigan State University, as well as from my experience in working with and supervising Masters level counselors in my career as a psychiatrist, a B.A. or B.S. is not preparation for counseling, and the knowledge and skill level is vastly different, which is why the North Dakota Board of Counselor Examiners requires an M.A. degree, as do other states. See N.D.C.C. § 43-47-06. Although I worked as a volunteer abortion counselor while an undergraduate, I did not at the time think that my training was adequate to prepare me to do what is now called "options counseling," and after helping several women obtain their abortions, I chose to move on to other aspects of clinic work due to recognition of my own lack of preparedness for the counseling work at my stage of education at the time.

299. At the website for the National Abortion Federation, I copied one paragraph of a description of a counseling education module that at some time in the past apparently was available for purchase, but is not now. I have included this paragraph below, and the section that is most pertinent in my opinion I have put in bold.

300. "Module 2 - Counseling and Informed Consent. This section provides an overview of approaches used for counseling patients seeking abortions and for obtaining informed consent. It is written with the understanding that counseling is a developed skill that requires a certain level of training and experience. The techniques for and content of **pregnancy-options counseling and pre-abortion counseling are somewhat different** subjects that require unique skills. **In many cases, the trainee may not routinely provide counseling on pregnancy options to the patient and thus may not be required to develop special skills in this area. However, the trainee should be familiar with the content of pregnancy options counseling and must be familiar with pre-abortion counseling** as well as the special considerations that apply in obtaining informed consent for abortion."

301. This "Module-2" also explains that "pregnancy-options" counseling is different from "pre-abortion counseling." Here is that mismatch again. Many women come in with the expectation that a counselor is a real counselor, and the counselor will help them to sort things through and make a good decision. Yet the "pre-abortion counseling" and "options counseling" are clearly different and those who are counseling at the abortion clinic generally do not have expertise in options counseling, and routinely do not provide this type of counseling. Therefore, any counseling that is conducted is nothing more than the requisite informed consent process and is for the purpose of trying to get the women through the procedure. They do not routinely provide counseling on pregnancy options to the patient and thus may not be required to develop special skills in this area. In fact, Ms. Kromenaker testified at her deposition that when reviewing the risks of abortion with a

woman, "we read the required statements" that are "part of that informed consent process." Kromenaker Deposition, pp. 42-44.

302. It appears that the Red River Women's Clinic is following the standards of the National Abortion Federation, but the National Abortion Federation has not kept up with mainstream health care standards. In 1973 when abortion became legal and widely available throughout all 50 states, few if any states had licensure laws for counselors, and there was no national examination for counselors in existence. Today, every state has a licensure law for counselors, with this transition to licensure of professional counselors taking place especially through the 1990's. In addition, many interdisciplinary medical teams include licensed professional counselors or licensed clinical social workers as part of a team approach to health care. For example, in cancer treatment, in rehab units treating victims of serious physical injuries, or in a dialysis center, or anywhere else within medicine that a "counselor" is used, this is normally, in 2014, a licensed counselor with a master's degree. The academic degree and the skill and expertise that go along with that degree and licensure are assumed and expected by members of the public. However, the understanding of counseling and the standards for counseling within the abortion clinic have not moved forward since the 1970's as they have within mainstream medicine.

303. Returning to the textbook *Clinician's Guide* (Baker et al., 1999), there are two items that are extremely pertinent as to the reasons women do not seek professional counseling, in my opinion, but I first want to return to the statement of MKK (Exhibit B-2, Bates 1711). She stated, "In 1978, I became pregnant and I went to my psychologist to

seek advice. He told me to go to Rapid City to get an abortion. I was never told that my baby was really a baby, I was never told there would be pain, nor was I ever told I would go through years of regret and mental anguish as a result of the abortion." Since MKK already had a relationship with a psychologist ("I went to my psychologist"), she apparently had a pre-existing mental illness, which is a very clear, undisputed risk factor for increased problems after abortion; however, she was not warned, perhaps because it was not known at the time. Even more importantly, since the psychologist had given her the advice to have the abortion, but it turned out very badly for her, it would be natural that she would no longer have confidence in that counselor and that she would not return to him. This may have been what happened because she said, "I have had no formal counseling, because I am too ashamed," for 27 years. She was not too ashamed to seek counseling for her original mental illness, but she was too ashamed to talk to anyone about the abortion—and she very likely did not have confidence in that psychologist having the ability to help her, when his original advice was so wrong for her.

304. In my opinion, a similar process as that outlined by MKK happens for women experiencing what is said to be counseling at the abortion clinics. If a woman has a counselor at the clinic, who is not skilled and not helpful, she will feel discouraged from seeking further help when needed after the abortion. Two examples from the textbook, *Clinician's Guide* (Baker et al., 1999) are illustrative. These examples demonstrate that what is considered "counseling" at the abortion clinic deviates from professional counseling in mainstream medical settings.

305. Here is the first excerpt: "When a patient cries, the clinician need not do more than pause, let her cry, and hand her a tissue. The patient's distress may diminish when the clinician attempts to understand the source of her tears. For example, 'A number of women cry at times like this and for many different reasons. I am wondering what your tears are about.' If the patient says that she does not know why she is crying, she may feel relieved to realize that many other women have said the same thing. The patient and clinician can then move on" (Baker et al., 1999). The authors may be considering this recommendation in light of the abortion industry standard that "a patient must undergo the abortion as expeditiously as possible" (National Abortion Federation, 2013) but seemingly without considering the other half of the standard, "in accordance with good medical practice."

306. First of all, it is not normal for patients to cry before surgery. During my medical school training, I obtained supervised clinical experience in general surgery and in gynecological surgery through required and additional elective courses. I performed pre-op examinations on many adults and adolescents over a period of months, and never saw an adult or adolescent patient cry or exhibit tears before surgery, even before cancer surgery. It is not normal for adults or adolescents to cry before surgery. Thus, it seems highly unusual that women are crying during the pre-op preparation at the abortion clinic in this textbook example. The fact that the authors (Baker et al., 1999) chose to discuss tears occurring prior to an abortion suggests that this is a relatively frequent occurrence prior to abortion. This excerpt indicates it is indeed a frequent occurrence, stating that "a number of women cry" and that "many other women" have had this experience of crying

before an abortion. Thus it appears from the textbook that this is a frequent occurrence--frequent at an abortion clinic, but very different from what is usually seen in hospitals prior to general surgery or gynecological surgery.

307. In 1973, when I received one evening of training to become an "abortion counselor," I was taught that abortion is comparable to a tonsillectomy in that both were, at that time, considered to be very simple, safe procedures. Since that time, there has been a significant decrease in the number of tonsillectomies being performed (American Academy of Otolaryngology--Head and Neck Surgery, 2014), partly because newer information has changed the risk vs. benefit analysis today, but the belief at the time was that these were very easy surgical procedures that were not expected to elicit worry or distress or medical complications for the patient. However, if abortion is just another surgical procedure, and a very easy one at that, why the tears?

308. While it is reasonable to hand a tissue to a crying woman, responsible medical or counseling practice would require some discussion of the meaning of the tears to that woman in that circumstance. The tears indicate distress associated in some way with the abortion, and are very likely to be related to one or more of the known risk factors including ambivalence about the abortion, commitment or attachment to the pregnancy, perceived coercion to have an abortion that the woman does not desire, appraisal of abortion as extremely stressful before it occurs, or other known risk factors that should be explored (Baker & Beresford, 2009; Coleman Report, Exhibit D). Failure to fully explore the meaning of the tears with that patient prior to elective, non-emergency surgery, is unacceptable and does not meet the standard of care.

309. The second example from *. The Clinician's Guide* says, "If she is feeling guilty about 'killing a baby'" it is recommended that the counselor respond, "Your believing that you are killing a baby must make this very hard for you. Tell me more about how you are feeling." It is also suggested that the counselor ask, "Do you believe that having an abortion is the same act as killing a 4-year-old child?" If the patient says, yes, she does believe that, then the counselor may ask, "How do you think you will feel about your decision to have an abortion after it is over?" Also, "How do you think you will feel about yourself?" And, "What will you do to cope?"

310. This illustrates yet another failure of the counseling process. Women who believe they are killing a child are at increased risk for mental health, emotional and psychological problems later. This is a well-established risk factor that is listed in both *Clinician's Guide* and in *Comprehensive Abortion Care* as a risk factor (Baker et al., 1999; Baker and Beresford, 2009). Although this patient is clearly demonstrating the presence of an established risk factor, the suggested response does not indicate any recognition of that fact. The patient with these thoughts is not being appropriately warned that she is at increased risk of mental health, emotional and psychological problems in the future, if she proceeds with the abortion while holding these beliefs. A thorough discussion of risk factors is certainly indicated, but that is not suggested in this example in which a woman feels guilty about "killing a baby." (Baker et. al, 1999). Rather, the counseling is first directed toward helping the patient to consider coping strategies apparently so that the woman may be able to expeditiously proceed with the abortion. However, in my opinion, proceeding with the abortion without warning of the increased

risk of mental health problems is not "in accordance with good medical practice" which is part of the National Abortion Federation's counseling standard--the abortion must be provided expeditiously but at the same time "in accordance with good medical practice." It is not accordance with good medical practice to proceed with a surgical procedure in the presence of a known, observed risk factor without warning the patient. In this example, a belief that abortion is "killing a baby" is objectively known as a risk factor that if present places the woman at increased risk for subsequent mental health problems, and it is a risk factor that is clearly in evidence within the statements made by the patient. It does not meet the standard of care for a counselor to attempt to direct the patient to think of possible coping strategies, with a goal of proceeding with the abortion expeditiously, while failing to disclose a known risk and failing to have a full discussion of the woman's unique situation and future mental health problems for which she would be at increased risk.

311. Secondarily, the authors suggest asking this patient "What about adoption?" (Baker et al., 1999). Asking this question in this way is a very weak suggestion for possible "options counseling" at this time. "Options counseling" is certainly appropriate before proceeding with an abortion in the case of a woman who believes that abortion is "killing a baby" and who is thus at increased risk for future mental health problems. The woman deserves a full consideration of the various options that may be possible for her. Yet the National Abortion Federation viewpoint, with which I disagree, is that it is not necessary for all abortion "counselors" to be skilled at options counseling, and that some abortions "counselors" do not need to provide "options counseling." Many women in my

clinical experience have expressed that they desired "options counseling" prior to their abortion, but they were not provided with "options counseling, and many have reported receiving no counseling at all, or to the contrary, many report having experienced pressure from clinic personnel to proceed with the abortion in what they later view as undue haste.

312. In regard to the suggested question, "What about adoption?" (Baker et al., 1999), I find this a very weak and ineffective attempt at "options counseling," because in my experience the abortion patient does not know much about adoption, and it would be more appropriate for the abortion counselor to know something about adoption and to be prepared to present it in a useful way. The counselor should be able to say, "With you having this belief that you are killing a baby, I am concerned because research shows that you are at increased risk for mental health problems later. I really think we need to spend some time talking through your options. If you do feel you can't parent this baby yourself, but the abortion is already troubling you in this way, it would be good to just review some information about the many different types of adoption that are available today, and you may even want to talk to an adoption counselor before you consider proceeding with your abortion plan." The textbook response of "what about adoption" is useless, in my opinion, because adoption has changed a lot in the last twenty years and I know social workers and counselors who are not well-educated on modern adoption practices. To ask the patient "what about adoption" is asking her to consider an option the woman knows little to nothing about, rather than offering information and counsel that would help the woman evaluate that option.

313. I find that the textbook responses (Baker et al., 1999) illustrate that abortion clinic personnel are not prepared to meet the expectations of women who are clearly experiencing risk factors and who are clearly experiencing distress and conflict about the abortion prior to the procedure. Likewise, the textbook examples illustrate that clinic personnel are not prepared to help those women who are not firm in their decision, who are still looking for options, and who want help with their decision. It should be noted that in this chapter, more space is allocated to the discussion of tears than to the discussion of options counseling. Similarly, the section on guilt is also more extensive than the discussion of options counseling which is limited to one paragraph, plus the one additional sentence, "What about adoption?" These examples demonstrate the failure of the abortion counseling process to assist the woman to identify and consider risk factors clearly pertinent to her own unique situation, and the failure to provide "options counseling" to women clearly experiencing distress prior to the abortion.

314. Some additional evidence about the counseling process comes from a report of a survey of members of the National Abortion Federation (Landy & Lewit, 1982), which states: "Counseling provided by specially trained abortion counselors is a unique contribution of abortion facilities to health-care delivery. Virtually all facilities employ counselors who are neither doctors nor nurses. Most NAF facilities have more counselors than nurses and more nurses than doctors. Counseling in virtually all facilities includes providing written as well as verbal information about the nature of the procedure and its medical risks; such information is given to the patient so that she can give informed consent for the abortion. Almost all facilities include information about contraception and

about the options available to a woman with a problem pregnancy." Here it says that "specially trained abortion counselors" (non-licensed counselors who in some cases are non-degreed, since no specific degree is required) are making a unique contribution. Then it lists all the many things these counselors do, first informed consent, and second, contraceptive information, third information about "options" (although remembering not all abortion counselors do that or have the skills to do it, as per National Abortion Federation website). The National Abortion Federation touts the fact all the non-licensed "counselors" who outnumber the actual nurses and doctors, are "specially trained" for informed consent counseling, and birth control counseling and can provide options counseling. Yet without any graduate education, licensing and an internship in counseling, these untrained "counselors" at abortion clinics are unlikely to have the skill level or knowledge to do this effectively.

315. Indeed, as Ms. Kromenaker testified at her November 26, 2013 deposition (page 29), the Red River Women's Clinic does not have even one licensed counselor on staff, so that any non-licensed counselors who provide abortion counseling are not being trained and supervised by a licensed counselor. Dr. Eggleston confirmed there are no licensed counselors who can offer care and services to women that come to their Clinic.

316. Considering all of the above, it is my opinion that there is ineffective and improper counseling by abortion clinics, because these "counselors" do not have sufficient education, training or counseling internship experience to prepare them to facilitate the woman's exploration of her own unique situation and her mental health risk factors, beyond a "check the box" form. This failure of providing effective and proper

counseling leads to women being dissatisfied with the counseling they receive at abortion clinics, and this in fact is what most of my patients have reported to me concerning their level of satisfaction with counseling at abortion clinics. Therefore, in my experience women view the counselor at the abortion clinic as having failed to provide assistance because the counselor permitted and even encouraged them to make a decision that they subsequently regretted, and the counselor permitted or encouraged them to make a decision to abort an unborn child without warning them about the long-term consequences and adverse effects to their mental health.

317. A different situation occurs after the abortion when women do seek help. Many years I ago, I had a patient who had an abortion she did not want, which she had at the urging of her husband who did not want more children, although she desired the pregnancy and they were financially secure. She had the abortion to please her husband but afterwards she experienced severe depression that caused her to be admitted to a hospital where I treated her. Although her perception was that she had been well until her abortion, which is when all the symptoms started, my supervisor at the time believed that the abortion was not the problem, that the woman was only obsessing about the abortion because she had a chemical imbalance that required medication.

318. I do know that when a woman is raped, if she starts having nightmares about the rape, or if she has increased anxiety or crying spells, or bad memories of the rape, no one would tell that woman, "It's not the rape, you just have a chemical imbalance." The woman who has been raped may indeed need medication, but she needs counseling to help her process the effects of the rape and move forward, and there are support groups

and treatment protocols for helping a woman in that circumstance. But when it comes to abortion, in the past, mental health professionals have often dismissed the symptoms and have failed to recognize that the abortion is also causing serious trauma for some women.

319. At one time this lack of recognition occurred in regard to incest, when Freud long ago thought that his female patients must have been imagining the sexual abuse they reported to him, although now the mental health profession recognizes that this has been a hidden problem for too long and today there are many therapy groups and treatment protocols for adults who experienced childhood sexual abuse. This recognition process took a long time for the problem of sexual abuse, and is still in process in regard to abortion.

320. When women do come for treatment for mental health problems, it is not standard to ask routine questions about any past abortions, and if a problem is identified, few counselors have had specific training in how to help. When a woman does seek mental health treatment, she may not be believed that her problems relate to an abortion. Further, the counselor may not know how to help if he or she did recognize that a problem was associated with an abortion. Due to the shame the woman may not reveal the abortion or symptoms such as nightmares about dead babies, further hindering treatment. Finally, the counselor has not been trained to ask about past abortions. Many women will avoid going to a professional counselor due to avoidance symptoms or shame, and if she does go to a professional counselor or psychiatrist, it is not highly likely she will be helped, due to these factors.

321. However, increasingly, women are receiving help through peer support programs and faith-based programs. With peer support programs, often founded and administered by women who have had themselves had an abortion, the women do not have as much fear of being judged and shame is less of a barrier to participation in these programs (though shame is still a barrier that can prevent or delay some women's participation). Often the leaders of such programs may disclose their own past abortion as they promote the support programs through churches and in the community, so that women recognize "here is someone who understands," and it removes a barrier to seeking treatment. The faith based peer support programs have been actively promoting themselves and have been rapidly growing and multiplying over the past fifteen years especially.

322. Because there are many different peer support and faith-based programs operating with some overlap between programs, it is hard to be certain how many people are being helped in this way, but the numbers are not trivial.

323. In the Catholic Church, there are 195 church districts called dioceses. Each diocese is supposed to have a post-abortion ministry (also referred to as abortion recovery ministry). The Catholic Church in the United States has an official outreach to post-abortive women called Project Rachel, and about 160 dioceses operate a local affiliate of the national Project Rachel Ministry. Other dioceses have abortion recovery ministries that may be unaffiliated and operated independently. The Project Rachel office provides national and local training conference for clergy, lay ministers, professional counselors and peer counselors. Project Rachel recommends that each church district identify and provide special training for licensed counselors and for clergy to whom women can

receive confidential referrals for individual help if desired regarding their past abortions, and in addition, many diocesan programs offer support groups, prayer services and weekend retreats for abortion recovery. Conservatively, at least 50 women per year on average in each diocese are being helped through Catholic programs, and some programs serve 150 women or more annually. Thus over the entire U.S., 10,000 women or more are being served annually by Project Rachel. In private communication, the founder of Project Rachel, Vicki Thorn, said she thought the estimate of 10,000 per year was reasonable though probably low, and she pointed out that Project Rachel refers to priests when a clergy referral is desired, but the priests do not keep any records or numbers, due to their own standards for confidentiality, so any woman receiving help through a priest may not be counted (V. Thorn, personal communication, Dec. 9, 2013). Thorn also named a number of different additional programs including some pro-choice programs that are now offering abortion recovery, and stated there really is no way to capture the total number of those being helped through the many and varied abortion recovery programs now available.

324. CareNet, a national affiliate organization for many pro-life pregnancy resource centers, offers faith-based peer support abortion recovery groups. Data collected from CareNet affiliates indicates they serve 16,000 clients annually (personal communication, Cindy Hopkins of CareNet, November 20, 2013).

325. Heartbeat, International is a similar network of pregnancy resource centers of which 737 of their U.S. affiliates offer peer support groups for abortion recovery (personal communication, Susan Dammon, R.N., of Heartbeat, International, Nov. 21,

2013). Heartbeat does not collect data on how many people are served at each center, but if each group served 20 people per year, which is a realistic estimate, Heartbeat Centers would be serving close to 15,000 per year.

326. Abortion Recovery InterNational (ARIN) has a "Care Directory" listing thousands of abortion recovery programs in the U.S. and counselors who are prepared to help with abortion issues. The Care Directory can be accessed online, or through phoning a toll free phone number. During 2012, more than 40,000 people contacted ARIN to seek help for abortion related mental health problems. Of these, some were from other countries, but more than 30,000 were from within the U.S. and more than 80% were first time contacts seeking referrals. Some of the CareNet and Heartbeat programs are additionally listed with ARIN, which is one reason I mentioned "overlap." Some of the women counted in the 16,000 for CareNet centers may have originally contacted ARIN which may be how they learned about the CareNet program, but there are also many smaller abortion recovery ministries and unaffiliated centers, and other national programs that list with ARIN, so certainly not everyone calling ARIN would have been referred to a CareNet program, and CareNet generates many of their own local referrals through local advertising. ARIN is intended to serve as a comprehensive directory and referral source for "all" the abortion recovery programs in the U.S., to the extent possible. Not every abortion recovery program is represented but they have thousands of abortion recovery programs in their directory. (I am on the Advisory Board for ARIN).

327. There is also a National Helpline for Abortion Recovery program that receives up to 300 phone calls per month seeking referrals. They have more than one thousand

abortion recovery programs in their data base so that callers are given referrals to programs in their local area, which could be to a CareNet abortion recovery program, or to a Heartbeat program, or to Rachel's Vineyard, or to an independent counselor or program. The National Helpline may be providing around 3,000 referrals per year. A unique feature of their program is that it is staffed entirely by post-abortive individuals so that callers know they are talking to someone who understands their experience. Everyone who calls is offered a packet of resources that can be mailed to them, in addition to being given a referral. The director of the National Helpline, Millie Lace, is a licensed counselor who has written an abortion recovery treatment protocol and workbook; she uses this protocol with her own clients and is training other therapists in its use, but the Helpline refers callers to recovery programs of various types depending on the caller's preferences and what is available in the caller's local area.

328. Rachel's Vineyard Ministries, Inc. has 250 ministry teams all over the United States (and others on six continents, though only the U.S. teams are being considered here). If each team is serving only 40 people per year, that would be 10,000 people per year served by Rachel's Vineyard. This program is conducted by a team that includes at least one minister or priest, at least one mental health professional, at least one peer counselor who has had an abortion, and other volunteers to the extent needed considering the number of people served. The Rachel's Vineyard weekend program usually serves groups of approximately 10 to 20 people at one weekend, and most teams offer at least two weekends annually, sometimes three or four weekends per year. Additionally, each local Rachel's Vineyard program may offer a range of services other than just the

weekend retreat. Rachel's Vineyard does not keep data at the national office on numbers of people served throughout the U.S., but 10,000 would be a reasonable estimate of people receiving direct services through affiliates of this organization. A few Rachel's Vineyard teams receive referrals through ARIN or through the National Helpline for Abortion Recovery, but Rachel's Vineyard has their own "hotline" to help refer people to their teams throughout the U.S., and local teams also promote their programs by speaking in churches and in the community, by various means of advertising, and receive many referrals by word of mouth.

329. The Rachel's Vineyard team in Atlanta (P.A.T.H.) on whose board I serve, provides both weekend retreats and faith based support groups, and some individual or small group counseling and peer support, serving about 60 people per year. The Atlanta organization has a counselor with a Master's degree as director, and has had several other mental health professionals involved in assessing new clients and in provision of programs which also include peer counselors.

330. Having served on the advisory board for Rachel's Vineyard and having served as a consultant and trainer for many Rachel's Vineyard teams, I know that many teams are serving 60 to 70 clients per year, and in larger cities, some teams serve 150 clients annually. I think the estimate of 40 clients annually per team is low, and may be an underestimate, but there is no way to know with certainty how many are being served by Rachel's Vineyard teams, and the estimate of 10,000 (250 teams x 40 people served by each team per year) is reasonable.

331. In addition to these major national ministries listed above, there are actually many others. Save One is a peer support group program, whose founder and national director is a post-abortive women. They operate a peer support group program led by post-abortive women which runs for about 12 or 13 weeks, and can be done four times per year. Save One has more than one hundred chapters throughout the United States (as shown on their website). If each of these teams served only 10 people year, that is 1,000 people each year being helped by Save One.

332. Surrendering the Secret is a faith-based program that started three years ago that has sold 10,000 copies of their workbook since 2009 and which has trained 1,500 leaders in the past three years, though they do not know how many women have gone through their program. From the number of workbooks sold, it would appear they are averaging about 2,500 women annually (personal communication with Pat Layton, founder, Nov. 21, 2013).

333. If we add up 10,000 women served by Project Rachel, 10,000 by Rachel's Vineyard, 16,000 by CareNet, 15,000 by Heartbeat, 1,000 through Save One, and 2,500 through Surrendering the Secret, at least 54,000 women are being served annually through faith-based programs, some which utilize mental health professionals and peer counselors, others relying on peer counselors. This does not account for all the people receiving help through this type of program, because there are many unaffiliated local programs which may use materials or methods from some of the larger programs or from other programs or publishers. The webpage for ARIN lists many additional programs that we have not considered here, and the total of 54,000 does not include the 40,000 people

who contacted ARIN, or those who contacted the National Helpline for Abortion Recovery, to avoid possible duplication.

334. Additionally, the American Association of Christian Counselors (AACC), a membership organization with 50,000 members, many of whom are professional, licensed mental health counselors, has recently created a new division for professional mental health counselors who have a special interest in providing counseling for problems related to pregnancy, abortion, or sexual trauma. This is a new division, and currently there are only 300 members, but this division is organizing annual continuing education workshops relevant to this topic, and increasingly, their membership will be professionally prepared to help women with mental health problems associated with and/or resulting from a previous abortion. Also, the AACC has adopted the abortion recovery program, "Into My Arms," created by a therapist who is in leadership within the new AACC division. AACC members are free to utilize any appropriate professional counseling methods to help people with abortion recovery issues, but this program is being promoted by the division, so this is another program that is and will be in the future increasingly serving many women.

335. The purpose of discussing these various abortion recovery programs is that these data show the magnitude of the mental health, emotional and psychological problems suffered by women who have had an abortion. As this discussion of these recovery programs illustrate, many women who are suffering from abortion-related trauma or other mental health effects of abortion are not entering the mental health system and receiving treatment there, due to shame and avoidance, and due to lack of expectation that they will

be helped. Some do, for example, one woman said in an affidavit or declaration that she had made a suicide attempt and had awakened in a hospital in restraints, so some do receive professional help at various times, but certainly many say they kept silent and did not seek help for a long time. When they do seek help, it is often because they have received hope through hearing a testimonial from another post-abortive individual who has spoken about her own abortion recovery through a faith based programs. Then some women, tired of suffering for so long, and discovering that nonjudgmental help is available, choose to seek help through faith based programs which have been growing exponentially over the past 15 years or so. In my opinion, the 54,000 that I suggest is an underestimate; the true number may be closer to 100,000 a year or more.

336. One benefit of the faith based programs for women who are experiencing the loss of their unborn child, is that faith based programs provide an opportunity to have a Memorial Service for the unborn child who is viewed by the woman as her own baby, and it gives her hope of seeing her child in heaven.

337. One other point is that most of these programs are entirely free of charge, since they are sponsored by nonprofit organizations and churches, though some would involve payment of a small fee for workbooks or a donation to cover lodging and meals when a weekend retreat facility is used. But the recovery programs are almost entirely operated by non-paid volunteers, and most of these programs, and even the individual mental health counseling provided, would not be billed to insurance. Thus, these programs are very low cost to the participants, which overcomes another possible barrier to treatment and there is no "record." There is a higher degree of confidentiality with these programs

since the information never gets entered to one's medical record, but when large data sets are examined for evidence of mental health treatment after abortion, participation in faith based programs will now show up, and the numbers of people receiving such treatment is not reflected in studies that utilize medical records or insurance claims. At the same time, the numbers of women participating in these faith-based programs, though the total number of participants is not fully known, demonstrates that some women do have significant distress following abortion for which help is sought.

338. It is my opinion to a reasonable degree of medical and scientific certainty that there is a failure to provide proper counseling and psychiatric care for women by abortion providers, like the Red River Clinic, and this in turn substantially increases the risk of mental health, emotional and psychological problems for women who have abortions. Again, in my opinion, this is a complete failure on the part of the Red River Clinic. Further, it is my opinion to a reasonable degree of medical and scientific certainty that many women who experience distress after abortion do not return to the abortion clinic to seek help and often do not seek help through the professional mental health system due to symptoms of avoidance and due to shame, and additionally due to disillusionment with the counseling profession based on ineffective counseling at the abortion clinics and in some cases unhelpful professional mental health counseling which has failed to recognize and address the abortion issues in a helpful way. Because of these factors, many women fail to seek treatment at all and thus do not come to professional attention, and this further conceals the problem from awareness by mental health professionals. Increasingly, many women are seeking help through faith based peer support programs and the growing

number of women seeking this help serves to illustrate that there are many women who have had distressing experiences with abortion from which they need recovery.

(P) **Women unable to access abortions within time limits are protected from increased risk of mental health, emotional and psychological problems and disorders**

339. To a reasonable degree of medical and scientific certainty, based on my clinical experience and the published literature, it is my opinion that to the extent that women may find themselves unable to obtain an abortion because of time limit, detection of a heartbeat or gestational age, this will provide a protection from pressure for those women who may have been experiencing pressure from others to undergo an abortion, and will protect their mental health in that they will not experience the increased risk associated with abortion. We have already considered at 18 through 23 that there are no established mental health benefits from abortion, so the women who would be turned away, if any, are not being deprived of any established mental health benefit. In my opinion, there is no peer reviewed evidence of any increased risk of any psychiatric diagnosis arising from being denied an abortion, but rather only a mental health benefit for women that could not have an abortion. Therefore, it is my opinion, to reasonable degree of medical and scientific certainty, that HB 1456 will benefit the women of North Dakota by preventing the mental health, emotional and psychological risks of abortion, and that there is no evidence of increased risk of any psychiatric diagnosis occurring from the event of women being unable to access abortion within a time limit; any short-term emotions that may, if at all, be associated with failing to obtain an abortion would be much less than the

increased risk of more severe negative reactions and mental health problems, as already discussed in this report, if the abortion were to take place after the heartbeat is present.

(Q) Statements of Red River Women's Clinic Patients

340. There is little that can be definitively concluded from the statements of the Red River Women's Clinic Patients. As mentioned previously, it is not clearly possible to tell in every case which statements were written before the abortion and which after the abortion. In addition, there are gaps of many months in between some of the statements. I note that some entries are dated, and the entries will jump from one date to another date several months later. It appears that either most patients do not write in the journals, or only certain pages have been submitted.

341. From the journal pages submitted, whatever the hopes are immediately prior to abortion or even at the time of the abortion while they are in recovery, the risk of mental health problems after abortion and of PTSD in particular would not necessarily be evident immediately, since as I have already stated, the literature shows that many people have delayed onset or late onset. So we do not know what the outcome will be for the individuals who made these statements.

342. It is true that a number of writers make hopeful statements, suggesting that abortion will make their life better, and sometimes expressing logical reasons for the abortion. But the centers in the brain that process trauma do not respond to logic. There is no research evidence that having a logical reason for an abortion prevents adverse mental health consequences of abortion. Many of these patients and those accompanying them

mention risk factors, such as being a teen, without knowing that their age places them at increased risk for mental health problems later.

343. One young man, a high school student, states of his girlfriend, "I can't imagine going through her pain." (This is located immediately following a page numbered PL 674; this may be intended as PL 675 since it is the next page following, but the copy is too dark for me to read any number that may be present.) This statement would seem to imply that he has observed her having some emotional pain concerning the abortion. If she is having emotional pain because of the abortion, why is she experiencing this pain? Is it because she has already bonded to her unborn child and it is painful to allow its life to be taken, even though because the young woman and boyfriend are still in high school, it is a logical decision. But if the young woman has bonded to her unborn child, she is at risk for future problems, whether in the short term or the long term, for example, when she carries her first intended child to term, and is reminded of this earlier child. She is at risk for future mental health problems by the fact of being in her teens, and perhaps because of having bonded to her unborn child, which is not known, or perhaps by having had distress in making this decision. We don't know the specific reason for the emotional pain, there is simply that observation, "I can't imagine going through her pain." There is no basis to expect that good, logical reasons for the abortion will override the effects of abortion in the presence of risk factors. We can't know what to except for any of these patients by their hopes or logical reasons either moments before or moments after their abortion.

344. I noticed one statement by a 15-year-old full of hope that the abortion would help her to have a better future, and it reminds me of some of the statements in the declarations and affidavits in which some women had thought that good would come from their abortion, but it brought them grief and anguish.

345. Some women mention having had a previous abortion, and they are back again; these women are at increased risk for mental health problems later, though they may have no idea, but studies show higher risk of problems for those who have repeat abortions.

346. Some of the notes are "thank you" notes to express appreciation for the funds received to obtain the abortion, but they don't reveal information about possible risk factors, nor can we know from these notes what the outcome will be for these patients three months or five years after the abortion.

347. My opinion is that nothing can be concluded from the notes of the Red River Women's Clinic patients except to recognize that some of them are in risk groups due to factors such as young age, ambivalence or repeat abortion, and some clearly are already experiencing emotional pain, which is suggestive that there may be problems later. However, it is impossible to draw any conclusions about this group.

V. SUMMARY

348. In summary, it is my opinion that an abortion is a substantial contributing factor and cause in increasing the risk of mental health, emotional and psychological problems and disorders for women who have had an abortion and in turn an abortion has a significant and profoundly adverse effect on the mental, emotional and psychological health, safety and overall well-being of women. Therefore, in my opinion HB 1456

protects women from these increased risk and adverse effects of an abortion and in turn promotes the health, safety and well-being of women, along with protecting the life of unborn children and the health and well-being of their families, and is medically and scientifically sound and reasonable.

VI. FEES AND RECENT EXPERIENCE

349. Fees for expert services: \$350 per hour for all in-office work, including record review, attorney consultation, client interviews, scientific literature searches, report-writing, affidavit construction, and testimony preparation; \$350 per hour for depositions and courtroom testimony.

350. See my CV attached noting list of cases in which I was deposed or testified at trial as an expert witness.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 6th day of January, 2014

/s/ Martha W. Shuping, M.D.
Martha W. Shuping, M.D.

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EXHIBIT A

EXHIBIT A: CURRICULUM VITAE

Martha W. Shuping, M.D.

Education	Psychiatric Residency	Wake Forest Baptist Medical Center, Winston-Salem, NC. 1984-88.
	M.D.	Wake Forest University Medical School, Winston-Salem, NC. 1980- 1984.
	M.A.	University of Dayton, Dayton, OH. Part-time 1985-92. MA, Religious Studies (Pastoral Ministry), 1992. Practicum involved development and implementation of a training program for adult volunteers at a pregnancy resource center. Studies included course work in counseling and adult education methods.
	B.S. magna cum laude	Michigan State University, East Lansing, Michigan. 1972-1975, and 1976-1977. B.S., with High Honor, 1975, Honors College. Subsequently, additional premedical studies. Honors research in psychology. Research assistant, Counseling Center.
Post-Residency Medical Education	Harvard University Medical School, Global Clinical Scholars Research Training Program. Part-time non-degree hybrid program (online work and face to face workshops) for advanced studies in medical research. July, 2013, through present. In progress.	

Employment

Martha Shuping, M.D., Private practice psychiatry, Winston-Salem, NC. 1991-present. Practice has included supervision of counseling interns and students from the MA programs of UNCG, Lee University, and Gordon-Conwell, Charlotte campus.

Daymark Recovery Services, Inc., Winston-Salem, NC. 2005-present. Contract psychiatrist. Out-patient psychiatry. Medical Director for Partial Hospital program, one year, 2006.

Holston United Methodist Home for Children, Greeneville, Tennessee. 1992-93. Part-time consultant.

Nolachucky-Holston Mental Health Center, Greeneville, TN. 1989-92. Staff psychiatrist (full-time) two years; Consultant (part-time) two years. Chair, Clozaril Quality Assurance Committee.

Crossroads Mental Health, Mt. Airy, NC, 1988-89. In-patient Coordinator, supervising medical staff and allied health staff on psychiatric in-patient unit; also out-patient psychiatrist in out-patient clinic, and supervisor of medical students.

Ashe County Group Homes, Inc. 1978-80. Executive Director of home for developmentally disabled adults.

Professional Publications

Shuping, MW. Wantedness and coercion: Key factors in understanding women's mental health after abortion. *Association for Interdisciplinary Research in Values and Social Change Research Bulletin* 2011; 23(2).

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Cougle JR, Reardon DC, Rue VM, Shuping MW, Coleman PK, Ney PG. Psychiatric admissions following abortion and childbirth: a record-based study of low-income women. *Archives of Women's Mental Health* 2001; 3 (4) Supp. 2:47. Presented at the 1st World Congress on Women's Mental Health, Berlin, Germany, 2001.

Licensure Licensed by North Carolina Medical Board. Fully licensed to practice outside of training program in January, 1988, and continuously licensed in NC through present.

Licensed in Tennessee 1989-93. Licensed retired after returning to NC on full-time basis.

Certification	International Training Specialist with Life International, June 6, 2010.
Memberships	Association of American Physicians and Surgeons. Christian Medical Association. American Association of Pro-Life Obstetricians & Gynecologists American Association Christian Counselors. WE CARE EXPERTS (World Expert Consortium for Abortion Research & Education).
Special Appointment	American Psychological Association, Division 48, Society for the Study of Peace, Conflict, and Violence: Peace Psychology. Presidential Task Force for a Research Agenda on Abortion from a Peace Psychology Perspective. Appointed 4/06/2013, to continue through 12/31/2014.
Other Publications	Shuping MW, Gacek C. <i>Post-Abortion Suffering: A Psychiatrist Looks at the Effects of Abortion</i> , Washington DC: Family Research Council, 2010. http://downloads.frc.org/EF/EF10B09.pdf Shuping MW, Gacek C. <i>Big Girls Do Cry</i> , Townhall Magazine, February, 2009. http://www.lifeissues.net/writers/shu/shu_11girlscryabortion.html Shuping M, Gacek C. The Supreme Court and psychological injury from abortion. <i>Insight</i> , 2008. Washington, D.C.: Family Research Council. Shuping MW, McDaniel D. <i>The Four Steps to Healing</i> , Tabor Garden Press: High Point, 2007. (ISBN-10: 0972876944). www.postabortionhealing.net
Other Experience	PATH (Post-Abortion Treatment and Healing) , Atlanta, GA. Member, Board of Directors, 2001-present. Voluntary consultant and trainer since 1999.

ARIN (Abortion Recovery InterNational, Inc.), Irvine, California. Advisory Board Member. 2009-Present.

Rachel's Vineyard Ministries, King of Prussia, Pennsylvania. Medical Advisory Board, July 2011- November 2013. Prior to that, since 1998, consultant and trainer for more than 20 sites in U.S., Europe and Asia (including Belfast, Brighton, Cork, Dublin, Glasgow, London, Liverpool, Tapei). Conference Speaker, International Leadership Conference, 2000, 2001, 2002, 2004. Coordinator of international leader's conference, 2004. Conducted more than 50 weekend programs for abortion recovery.

Catholic Diocese of Charleston, May 2005 – August 2009. Consultant to Family Life Office, providing consultation, training and supervision for clergy, professional counselors and lay volunteers related to abortion recovery ministry.

Catholic Diocese of Charlotte, Catholic Social Services, Respect Life Office. 1984-2008. Voluntary: Provided continuing education for clergy and social workers; served on Diocesan Respect Life Board in 1980's; established Rachel's Vineyard program for abortion recovery in Diocese of Charlotte in partnership with Respect Life Office; trained staff, volunteers, and clergy in this model; coordinated Rachel's Vineyard weekends in Diocese of Charlotte 1999-2008; organized educational conferences. As contract staff: wrote weekly newspaper column for 2 years.

Birthright of Winston-Salem, NC, Executive Director, 1988-89. Assistant Director, 1984-1988. Pregnancy Resource Center. Voluntary positions involved direct client services, training, supervision and continuing education of volunteers and staff, and administrative work.

Drug Education Center, East Lansing, Michigan. January - December, 1973. Volunteer. Provided crisis intervention counseling on a suicide prevention hotline, served as assistant in free medical clinic for low income patients, and served as counselor for patients seeking abortions.

Media Presentations: **40 Years after Abortion, National Press Club, Washington, D.C.** 12/04/12. My presentation, "Women's Mental Health after Abortion: The Evidence," highlighted scientific research regarding mental health problems that many women experience after abortion, including information from abortion providers. Power point slides available at:
<http://www.40yearsafterabortion.org/dr-martha-shuping-m-d/>
Video of presentation available at:
<http://www.40yearsafterabortion.org/national-press-club-event-videos/>

Life Matters TV, Boston, Mass., November 20, 2012. Interviewed by Brendan O'Connell on abortion and women's mental health.

Washington Watch Weekly Radio, Family Research Council, Dec. 25, 2009. Radio interview concerning abortion and women's mental health.

Educational Presentations: **Centre for Life, St. John's, Newfoundland, Canada.** Oct. 17-20, 2013. Series of educational meetings to educate clergy, mental health professionals and the public about mental health issues associated with abortion, and to train professionals in abortion recovery counseling methods.

Anglicans for Life, St. Andrews Episcopal Church, Charleston, SC, 10/09/13. Presentation on women's mental health after abortion, and on abortion recovery counseling.

CareNet Conference 2013, Denver, CO, 9/06/13. Presented accredited continuing education program for nurses related to abortion recovery counseling.

CareNet Conference 2013, Denver, CO, 9/05/13. Panelist on “Dynamic Dialogues” panel on topic of abortion recovery counseling.

Rachel’s Vineyard of S. Korea, Seoul, S. Korea, 8/10/13. Interactive workshop on the abortion recovery process with S. Korean Rachel’s Vineyard team.

GYNOB, Seoul, S. Korea, 8/03/13. Presentation to Korean physicians on women’s mental health after abortion.

Heartbeat Conference, Dallas, Texas, April 4, 2013. Women’s Mental Health after Abortion. Accredited Continuing Education for nurses.

Texas College of Osteopathic Medicine (University North Texas Health Science Center), Fort Worth, Texas, April 3, 2013. Presentation to medical students on women’s mental health after abortion.

Healthy Futures, Deva, Romania, December 6-8, 2012. Multiple presentations to youth in public schools and church youth groups regarding sexuality and reproductive health issues. Also staff training for adults regarding abstinence education.

Hope Conference, Rachel Ministries, Fort Worth TX, Oct. 12-13, 2012. Speaker on women’s mental health after abortion, and abortion recovery ministry.

International Institute of Bioethics & Patient Care Advancement (IBPCA), Manassas, Virginia, June 12, 2012. Speaker on abortion research and post-abortion counseling to summer fellowship program for medical students.

Congreso Internacional de Acompañamiento Post-aborto, Santiago, Chile, 10/12/11. Presentation on Men and Abortion.

Association of Interdisciplinary Research in Values and Social Change, Orlando, Florida, 6/22/11. Panelist: Women's Mental Health after Abortion.

United Nations, New York, 55th Meeting of the Commission on the Status of Women, 3/2/11. Panelist: Women's Mental Health after Abortion, on panel sponsored by Genesis Life, Romania.

United Nations, New York, 55th Meeting of the Commission on the Status of Women, 3/2/11. Panelist: From Girls at Risk to Women of Strength, on panel sponsored by Disha Foundation, Delhi, India.

Shiawassee County Right to Life, St. Paul Catholic Church, Owosso, Michigan, 1/15/11. Speaker, women's mental health after abortion and abortion recovery issues.

Disha Foundation, New Delhi, India, 11/12/10 – 11/13/2010, speaker on abortion and women's health.

Women in Medicine and Dentistry Conference, Providence, Rhode Island, 9/23/10. Speaker for pre-conference which was an outreach to local community organizations, with presentation related to women's mental health and reproductive issues.

Triad Students for Life, Salisbury, NC, 8/13/10, conference speaker on women's mental health after abortion, and abortion recovery ministry.

American Association of Fertility Care Professionals, Greenville, South Carolina, 7/24/10. Accredited CME presentation for physicians and nurses, on women's mental health after pregnancy loss (miscarriage and abortion).

Michael Job Memorial College of Education for Women, Coimbatore, India, July 7 - 9, 2010. Presentations on Mental Health Issues in Education.

Triad Students for Life, Kernersville, NC, June 18, 2010, presentation on women's health issues and abortion.

Genesis Life, Deva, Romania, May 7 – 9, 2010. Coordinator and speaker at conference with participation by 23 different European organizations, from five different countries, concerning abstinence education, pregnancy loss issues (miscarriage and abortion) and other family issues.

Emmanuel College, Oradea, Romania, May 5, 2010. Presentation to Social Work students regarding issues related to marriage, pregnancy and abortion.

Endeavor Forum, New York, NY, March 11, 2010. Speaker at workshop in association with meeting of the United Nations Commission on the Status of Women.

Genesis Life, Deva, Romania, 10/14 – 10/20/09. Training volunteers and professional staff for pregnancy resource ministry, post-abortion healing, and abstinence education. Speaking to churches, clergy organizations, medical professionals, high school faculties and other groups on topics related to abortion, abortion recovery ministry, and abstinence education.

Valsagterhesseg, East European Regional Conference, Budapest, 10/10/09 – 10/14/09. Conference co-organizer and speaker on topics related to pregnancy resource centers and abortion recovery programs for volunteers and staff of pregnancy resource centers and abortion recovery programs throughout Eastern Europe.

Generace Plus, Prague, Czech Republic, October 8, 2009. Presentation on women's mental health after abortion.

CareNet Conference, Baltimore, Maryland, Sept 11-12, 2009. Accredited continuing education for nurses. Presented on panel Sept. 11, and workshop speaker Sept 12, on women's mental health after abortion.

World Congress of Families, Amsterdam, Netherlands, August 10, 2009. Panel Co-Chair, Family Counseling and Professional Help.

Hope for Life Conference, Operation Outcry, Atlanta, April 17, 2009. Speaker related to women's mental health and abortion.

United Nations, New York, 53rd Meeting of the Commission on the Status of Women, 3/5/09 – 3/13/09. Organized and presented at two NGO workshops, 3/11 and 3/12, speaking on women's reproductive health and mental health.

The Leadership Institute, International Leadership School, Arlington, VA, 1/26/09. International perspective on abortion and mental health.

Blogs for Life Conference, Family Research Council, Washington, D.C. 1/22/09. Conference Speaker on women's mental health and reproductive issues.

Catholic Diocese of Charleston, Midlands Deanery Meeting, Columbia, SC, November 11, 2008. Presentation to priests on women's mental health after abortion, faith-based abortion recovery programs, and role of priest.

40 Days for Life, Clemmons, NC, September 20, 2008. Presentation on women's mental health and abortion.

40 Days for Life, Kernersville, NC, September 18, 2008. Presentation on women's mental health and abortion.

Catholic Diocese of Charleston, Columbia, SC, Meeting of Diocesan Respect Life Coordinators, September 13, 2008. Presentation on research on women's mental health after abortion, and abortion recovery programs.

Notre Dame University Law School, Notre Dame, Indiana, 10/31/08. Presentation to law students on issues related to women's reproductive health.

Notre Dame University, Notre Dame, Indiana, 10/30/08. Presented to group of several student organizations on women's mental health and reproductive health.

Family Research Council, Washington, DC, 10/09/08. Panel Presentation. Speaker on women's mental health and abortion.
<http://www.frc.org/get.cfm?i=PD08K01>

CareNet Conference, Atlanta, 10/04/08. Speaker on women's mental health after abortion, for continuing education credit for nurses.

Women in Medicine and Dentistry Conference, San Diego, 9/27/08. Accredited CME workshop for physicians regarding abortion and mental health.

XVIII Congreso Ecuatoriano de Ginecologia y Obstetricia, Guayaquil, Ecuador, 7/16/08. Presentation on women's mental health after pregnancy loss, to Obstetricians and Gynecologists from Latin American nations.

Women's Leadership Conference, Hickory, NC, June 4 – 7, 2008. Presented on women's mental health and pregnancy related issues.

United Nations, New York, 52nd Meeting of the Commission on the Status of Women, March 3 - 5, 2008. Presented two NGO workshops on women's health and abortion.

The Leadership Institute, Arlington, VA, International Leadership School, Jan. 24, 2008. Conference Speaker.

Schreeuw om Leven Conference, Seoest, Netherlands, 12/06/2007. Presentation on women's mental health after abortion.

Le Chatelard Academy, Les Avants, Switzerland, 11/29/07, Conference speaker on abortion and women's health.

Society for the Protection of Unborn Children, April, 2007. Preparation of research summaries related to abortion and women's health.

Human Life International. April 2007. Prepared research summaries and arranged translation of research.

American Association of Pro-Life Obstetricians and Gynecologists, Fort Lauderdale, Florida. January 27, 2007. Speaker, annual continuing education conference for physicians and nurses, accredited CME workshop on women's mental health after pregnancy loss (miscarriage and abortion).

Women for Life Taiwan, Tapei, Taiwan, 11/29 – 12/1/05. Conducted training for mental health and social work professionals and volunteers regarding women's mental health issues after abortion.

National Taipei College of Nursing, Institute of Life and Death Education & Counseling, Tapei, Taiwan, 11/28/05. Presentation to nursing school faculty on women's mental health after abortion.

Fu-Jen University, Tapei, Taiwan, 11/27 – 11/28/05. Conference speaker, Adolescents and Abortion.

Le Chatelard Academy, Les Avants, Switzerland, 4/20/05, speaker on abortion and mental health.

Concerned Women for America, U.N. Consultant, 4/11 – 4/21/05, United Nations, Meeting of Human Rights Commission, Geneva, Switzerland.

Real Alternatives of Pennsylvania. 3/31/05. Speaking to professional pregnancy counselors for accredited continuing education, regarding the psychological effects of abortion.

Silent No More Awareness Campaign, Belfast, Northern Ireland, October 31, 2004. Speaker on abortion and women's mental health at event co-sponsored by Precious Life.

Loyola Hall, Liverpool, England, 10/27/04 and 10/28/04. Presentations on women's mental health and abortion.

The Women's Centre, London, England, 10/22 – 10/24/04, staff training weekend on abortion recovery counseling.

Mariel Women's Centre, Cork, Ireland, 9/3/04 – 9/5/04. Staff education on abortion recovery counseling.

Mariel Women's Centre, Cork, Ireland, 9/2/04. Educational workshop for counselors and health professionals from the community on women's mental health and abortion.

Care Confidential, Loughborough, England, Directors Regional Conference, 8/25/04. Speaker on abortion and mental health.

ARCH, Glasgow, Scotland, 8/20/04 – 8/22/04. Conference speaker on women's mental health and abortion.

Precious Life, Belfast, Northern Ireland. Educational programs and staff training on abortion and mental health in Belfast and Derry. 8/19/04 and 10/28 – 10/31/04.

Intercession for Priests, All Hallows College, Dublin, Ireland. August 18, 2004. Presentation to Catholic priests on the topic of ministry to women who have had abortions.

Mariel Women's Centre, Cork, Ireland, 4/23 – 4/25/04. Staff training, abortion recovery counseling.

The Women's Centre, London, England, 4/19/04, workshop, recovery programs for pregnancy loss.

European Life Network, Drogheda, Ireland. “Protecting the Vulnerable Conference,” November, 2003, Conference speaker.

Mariel Women's Centre, Cork, Ireland, 10/29/03 – 10/31/03, staff training weekend, abortion recovery counseling.

**Legislative
Testimony**

NC House of Representatives, Judiciary B Committee, 5/11/11. Testified on HB 854 Women's Right to Know Act, regarding women's mental health and abortion.

Maryland House of Representatives, 3/14/08. Testified before a House Committee in regard to HB 1146, regarding women's mental health and abortion.

South Dakota Abortion Task Force, Sept. 2005. Testified before South Dakota governmental task force related to maternal - fetal bonding and pregnancy loss issues in medical literature.

State of South Dakota, House of Representatives, February 2004. Medical testimony regarding health effects of abortion.

Legislative Briefings	U.S. House of Representatives, Washington, DC, 1/27/09. Briefings on women's mental health and reproductive issues for Congressional staffers sponsored by Congressman Trent Franks.
	U.S. Senate Values Action Team, Washington, D.C., 7/31/07. Presentation on women's mental health after abortion to Senate staffers and members of non-profit organizations that advise the Senate Values Action Team.
Expert Testimony	United States District Court for the Western District of Washington, Stormans, et al. v. Selecky, 2012. Submitted expert report on behalf of the Plaintiffs during 2008. After full trial, court upheld constitutional right of conscience for pharmacist and pharmacy owner; case is now under appeal.
	United States District Court for the District of South Dakota, Southern Division, Planned Parenthood Minnesota, North Dakota, South Dakota, and Carol E. Ball, M.D., Plaintiffs v. Dennis Daugaard, Governor SD, Marty Jackley, Attorney General SD, Doneen Hollingsworth, Secretary of Health, Department of Health SD, and Margaret Hansen Executive Director, Board of Medical and Osteopathic Examiners SD, in their official capacities, Defendants. Submitted expert written testimony on behalf of the Defendants, 6/15/2011. Case is still in litigation.
	Virginia Eastern District Court, Lindsay v. Burlington Coat Factory of Virginia, LLC. Virginia. 2010. Prepared expert report and was deposed as expert witness for personal injury case involving posttraumatic stress disorder. After full trial, court decided in favor of the Plaintiff.

EXHIBIT B-1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
SOUTHWESTERN DIVISION**

MKB Management Corp.,)	
d/b/a Red River Women's Clinic, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 1:13-cv-071
)	
Birch Burdick, in his official capacity as)	
State Attorney for Cass County, et al.;)	
)	
Defendants.)	

DECLARATION OF JODY CLEMENS

“My name is Jody Clemens. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

“As a woman who has been injured by the abortion industry in North Dakota, I speak from personal experience that the North Dakota ban on abortions after six weeks on a child with a heartbeat is necessary and beneficial. It will prevent devastating, irreparable damage to women like me.”

“I was 23 years old, single, had successfully completed college and was teaching school when I took a pregnancy test that came back positive. I always knew getting pregnant was something that happened to others – but I never thought it would happen to me....but it did. I felt no joy or excitement but rather fear, shame and despair. My first response was that I had a problem that needed to be fixed.”

“Feeling very vulnerable I spoke with several trusted individuals who advised me that abortion may be the best solution for ‘this problem.’ Alone and afraid and being driven by fear and insecurities an appointment was made for my abortion. The pregnancy test that once confirmed I was “having a baby” now became just another medical procedure that could be medically treated. This problem could be fixed.”

“I remember vividly almost everything about the abortion. I was offered no information on the procedure, no information on fetal development, and no information on the affects and aftermath of abortion. But I was told that it wouldn’t be painful, that it was a quick and easy procedure, that I would be in and out in no time at all, and that “it” was so small and nothing more than a blob of cells. They lied to me and they still are lying to women. They did not tell me about the devastating emotional consequences of abortion.”

"The money was collected for the abortion and then I sat and waited. My name was called and I was ushered back to a procedure room where I underwent an excruciating and painful procedure. I cried. What I had worked to successfully deny and dehumanize; now became a reality. I knew my baby was dead and what I had done I could never undo."

"I was taken to a recovery room and fear ripped my inmost being. I made a vow to myself that no one would ever know about this and I would never talk about it again. This was now my "secret" and I felt isolated and alone. My choice did not end my shame, despair, and fearit was only the beginning!"

"I left the abortion facility and guilt, fear, and remorse flooded every fiber of my being. The years that followed my "free choice" were lost years in many ways. I engaged in self destructive behavior and was emotionally exhausted as I worked to keep my secret. I was completely worn out and without hope. I kept thinking that if I could just do more or be better then maybe I could be okay. But I wasn't."

"I later married, never telling my husband about my abortion. I became pregnant again and only then learned that 21 days after conception that my baby's heart was beating. That meant there was new blood circulating through new veins in a new little human being. Questions flooded my mind. Why wasn't I provided with this information when I had my abortion? Why did the abortion industry hide this truth from me? Why had they lied?"

"Had I known the truth that my baby's heart was beating at the time of my abortion I would have never gone through with the procedure. A beating heart means there is life. My baby was alive – he may have been small; but he was very much alive."

"I had believed the lies of the abortion industry and in doing so allowed some well-paid stranger to invade the sacred territory of my womb to end the life of my child. Even though the Supreme Court of our beloved nation legalized this atrocity and crime against humanity they will never have the power to nullify the sense of justice that cries out to be satisfied once the truth about abortion is known. I suffered in silence for ten years living with shame, guilt and fear. I deserved the truth and did not yet it. I deserved better. All women deserve better."

"If this law had been in effect for me, I would not have suffered the irreparable injury I have. Part of me died that day and I will never fully be whole in this life. My child died that day and I will be forever hurt by that loss every day."

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this _____ day of _____, 20 ____.

Jody Clemens

Mr. Parker,

I was asked by Jody Clemens to prepare a statement for you on the effects my abortion had on me. This is what I have to say:

No woman should be allowed to kill her child - no matter at what stage of life. I had my abortion in 1989 when I was 21 years old, a single mother of a 1-year-old child going to college. I was devastated by the positive result of my pregnancy test. I was raised in a loving home and never thought abortion would ever enter in my life so personally. At the time, I was young, naïve and profoundly desperate. I didn't know how I would ever manage to finish college, get a good enough job to raise 2 children by myself, and quite frankly, was so scared of what my parents, friends and family would think of me for getting pregnant a second time out of wedlock. I thought abortion was my only option. It was the most selfish decision I ever made in my life. Once I was at the abortion facility, when asked why I wanted the abortion, I told them I simply had no other choice. I wished that someone would have said - yes, you do have options and here they are. Instead I was told I was doing the right thing. But in my mind, I was screaming for someone to give me other options. I paid them money up front and no form of counseling was ever given to me. Looking back on it, they took advantage of my vulnerability in a desperate situation. I think it's important for people to know that I accept full responsibility for my actions but the abortion facility also had responsibilities and they failed miserably. Once I was led back to the room where the abortion was done, I was in extreme emotional turmoil. I had to have two nurses hold me down as they administered 3 long needles into my cervix. When the doctor came in, I was sobbing uncontrollably. He asked me what was wrong - I told him I couldn't go through with it - that I was Catholic. He simply said, it's okay - I'm Catholic, too. I said nothing and the abortion was performed. My silence allowed the death of my child and I will no longer be silent on the issue of abortion. When I was taken to the recovery room, I felt as though my heart was completely ripped out of my body. I felt dead inside. A nurse came up to me with a petri dish that was covered by a towel. She said to me, "I want you to take a look at your abortion so that you can empathize with other women in the future." What she showed me was tissue about the size of a pinky fingernail- not bloody, but simply a piece of tissue. She pointed to a small black dot in the tissue that was about the size of a pen dot. She told me that was the fetus and the entire tissue was my abortion. Now, I was 21 and knew that that was not my abortion but my frame of mind was such that I believed it was - I suppose as a way of preserving my sanity. For the next 3 weeks of my life, I drank alcohol until I passed out. Slowly I began to realize that I had to somehow go on. I tried so hard to erase the memory of my abortion, but always felt like I was a terrible mother to the child I did have. I became a bulimic, struggled with alcohol addiction, thought of suicide often and lived in my own personal hell that I created for myself. I hated myself for what I had done. It was a secret that I swore I would keep until I died. When I became pregnant with my last child, 14 years later, I studied furiously all the baby development books I could. I realized what my aborted baby looked like at 8 weeks and the memories came flashing back in tidal waves. Once again, I began drinking heavily. I could no longer live in my private hell and sought counseling. Through a Rachel's Vineyard (www.rachelsvineyard.org) retreat, I was able to make peace with God, my child, and myself. I have since counseled many men and women through Rachel's Vineyard who have suffered the effects of their abortion - women who were raped, got pregnant through incest, and countless stories of pain and grief. Abortion hurts the unborn and their mother, their father, and entire

families. If I could turn back time, I would not have had an abortion. It robbed me of nearly 20 years of my life. A person simply cannot take the life of someone else and have their conscience be free.

Ruth Ruch
Fargo, ND

My name is Terry Melby. I was 27 when I had a first trimester abortion. I was a single mother of two children, and a full time student. Although I was prochoice, and had fought for abortion rights in the early 70's, I had never thought I would consider abortion for myself. I had watched as several friends suffered after their abortions. I still thought abortion should be safe and legal, but that it should be rarely used, and only as a last resort.

There were two people I thought would help me through my pregnancy, both financially and with a place to live. I was shocked when they both said I needed to have an abortion. With their lack of support, I started to think abortion was my only option. I couldn't envision staying in school and taking care of three children by myself. However, I still didn't want to have an abortion.

I went to medical professionals to ask questions about fetal development. I was told there was no human-like development; rather that it was just tissue, a POC (product of conception). Still reluctant, I asked specifically if "it" could feel pain, and was told no, that a mass of cells could not feel pain. They said the cells were about the size of dot made by a ballpoint pen. I tried to believe this. After all, they were nurses and doctors giving me the information. Reluctantly, I agreed to abortion, thinking it was my only option.

I was given no information about how the abortion procedure itself, nor was I informed of possible complications or negative aftereffects that might occur. I was told that the procedure was much safer than child birth. I was totally unprepared for the abortion procedure and its consequences.

After the abortion, I realized that I had taken the life of my child. No one told me that; I instinctively just knew it. I also knew I was the worst mother in the world. How could a good mother kill her own child? I began to drink very heavily and daily. I engaged in reckless, self-destructive behavior, drinking and driving with my kids in the car. I desired to become pregnant again, to replace the baby I had just lost. I was suicidal, and nearly completed a suicide plan less than a month after the abortion. I suffered with physical complications caused by the abortion. Everything in my life changed after the abortion, and it took years to recover from it.

Looking back, I know I was lied to about the development of the fetus. If I had just been told the truth, that the baby was formed and had heartbeat, I would not have gone through with the abortion. My child would be 32 years old now. My children would have had another sibling; my parents would have had another grandchild. Life would have been different for us all.

Over the past 30 years, I have worked with several post abortive support groups, and heard the stories of many women. A common thread through their stories is the lack of accurate information they were given prior to the abortion, information that had it been received, would often have resulted in a different decision. Their children would have lived and they would have saved themselves a lifetime of regret.

I have also heard the horror stories of women who suffered with physical complications, both during and after the abortion. Most were not in a hospital setting where they could receive

quality care for complications. Physical consequences included further surgery and infertility. Women said they were not warned of these possibilities.

Some of the long term consequences that women frequently talk about in a support group setting include relationship problems, self-hatred, alcohol and drug addiction, difficulty bonding with their children, eating disorders and other self-destructive behaviors.

Women deserve better. Prior to making this life-changing decision, they deserve nothing less than the truth about fetal development, the risks of the procedure, and the long-term aftereffects they may experience. If this information was readily available, many would choose to give birth to their children.

Good Evening, Mr. Parker,

I was asked by my friend, Jody Clemens, to share my abortion story. Though I didn't have my abortion in ND, I know God is calling me to share my story in an effort to keep the new legislation that was passed in my dear state of North Dakota. Here is my abortion story:

I became pregnant at the age of 16. I got pregnant the same night I lost my virginity. It was the summer before my junior year in High School. I became very sick with classic morning sickness and knew that I was pregnant. My boyfriend was across the state, a junior in college. I was from Western North Dakota and there were no resources for a girl in a crisis pregnancy. Because we were so young & had big plans for our lives, I decided that I had to have an abortion. Though I really wanted to keep my baby, I knew that it wasn't feasible & I wouldn't get the support I hoped for from my parents. In a selfish, twisted version of love for my baby, I decided that if I couldn't have him, no one could. After I told him that I was pregnant, a few weeks after I *knew*, he began researching the abortion laws of ND. We found out that because I was a minor, I wasn't able to have an abortion.

Eventually, my mom figured it out & confronted me. When I confirmed her suspicion of pregnancy, she quickly took action. When my boyfriend came back to visit for Thanksgiving, she told my dad. He was incredibly angry. I didn't say a word that night while my boyfriend explained *our* decision to have an abortion. The next day, I had a doctor's appointment with a Pro-choice doctor that my mom had found in Minot. That Dr. knew exactly why I was there. I was there to find out how far along I was in my pregnancy and where I needed to go to have an abortion. During that appointment, I found out that I was beyond 16 weeks pregnant, which meant that I had to leave the state to have my abortion. During that same appointment, the Dr. asked me if I wanted to hear the heartbeat of my baby. I was shocked. She *knew* why I was there. I refused because I knew that if I listened, I might change my mind & I couldn't do that.

After that appointment, my mom made an appointment for the abortion facility in Minneapolis. The morning of that appointment, we left very early, picked up my boyfriend along the way & got to my appointment that afternoon. The first thing that happened, I paid for my abortion. \$700 cash. After that, I had a supposed counseling session where I cried the entire time. I remember the counselor asking my why I was having an abortion & me explaining that I was only 16. No alternatives were offered. She also asked me why I was crying. I was upset that she had to ask. "I'm here to have an abortion. To kill my baby." I went back out into the waiting room. They move you around a lot, not allowing you a lot of time to think. The more time you are there, the more you feel invested into *their* time and more obligated to follow through with the decision.

After a little more waiting, we watched a movie about the procedure itself - it was an animated diagram-type movie - describing what was going to happen. I don't remember any of it because my boyfriend nearly fainted during it. Back to the waiting room. Then, to an exam room where an ultrasound was done to determine if they were legally able to do my abortion. I was 19 weeks pregnant. Near the same time when you get an ultrasound to find out the growth & development and, perhaps, the sex of your child during a "normal, healthy" pregnancy. The technician was very careful to not let me see the screen of my ultrasound. I know now that if I had seen that

little head & the heart of my child beating, I would have fled and my son would be with me here today.

After more waiting, I was taken to change into a gown & then into an exam room where I was "implanted" with 5 laminaria. They were similar in size to a wooden match stick. This was the most brutal thing that has ever happened to me. From that moment on, I HATED that "doctor". After this procedure, I was sent away to a hotel room for the night with antibiotics to prevent infection and the instructions to bring back anything "that might fall out" wrapped in toilet paper back to the facility the next morning. I was too naive to realize that what had just been done was putting me into labor & could have been reversed if I had been taken to an emergency room.

While at the hotel I began cramping. I still had no idea what was happening. That I was going into labor, dilating & preparing to deliver & have my baby killed during the process. I hardly slept because of my discomfort.

The next morning, we arrived at the facility quite early. I was taken back to the same exam room I had been the day before. The same "doctor" came in & there was a nurse. She put in an I.V. for antibiotics. I remember a lot pulling & tugging and a lot of discomfort during the procedure. I cried the entire time, saying "I'm sorry, I'm so sorry" over & over. The nurse held my hand and asked me why I was sorry. I told her I was telling my baby I was sorry because I didn't know what else to do.

After it was over, I got dressed & was taken to a recovery room for a little while. I then got in the car & drove back home. I went to school the next day.

From that day on, I was a completely different person. I became very controlling & angry. I second-guessed my every decision and have had difficulty trusting people. I became a perfectionist and an excellent student. I did everything I could to outwardly look like I was "fine".

I went to college to become a teacher. I know now that I did that to pay back for what I did. The father of my baby & I broke up. I became somewhat promiscuous & I began to drink. I also suffered from depression.

My abortion was who I was, my identity. Everything I did was connected to the effects my abortion had on me. It poisoned my life. I was terrified that I would never be able to have children. And, if I did, they would be killed or hurt in some way because that is what I deserved.

Erin Hill
701.428.0138

When I had my abortion, I was told that there were no harmful effects and my life would go back to normal. My life was anything but normal after I walked out of the abortion clinic. Immediately, I began living a lie. I kept it from family and friends as well as lying every time I went to a doctor appointment. I sabotaged relationships believing that no one could ever love someone who would have an abortion. My sense of self-worth was destroyed. I shut down emotionally and became an angry person. Being angry was safe because I could direct it at someone or something. No one told me about the emotional and physical trauma that comes with having an abortion. After years of living in pain and dealing with self-destructive behaviors, I came to a place where I wanted to reach out and help other women who were suffering from the aftermath of abortion.¹

I have been able to help several women deal with their abortions through Healing Hearts Ministries. They have experienced emotional trauma, turned to alcohol and/or drugs to bury the pain, and have had many struggles in their marriages, including affairs. They had no idea of the devastation that awaited them after their abortions.

The only counseling I remember receiving was being told that no one would ever have to know. I was told that even during a medical exam, a doctor would not be able to tell I had an abortion so I wouldn't have to list it in my medical history.

If I had been told the truth about the development of my baby—that he was more than a mass of cells and had a heartbeat at 6 weeks—I would never have gone through my abortion.

Rhonda Nygaard
2801 23rd Ave S #313
Fargo, ND 58103
shoe.girl98@yahoo.com

When I was 19 years old, I had a first trimester abortion. It was the single worst decision of my life. The emotional and spiritual fallout from that abortion nearly destroyed me.

Not one person talked to me about the baby – about what stage of development my baby was at and what developmental milestones may have already taken place. No one talked to me about the possibility of adoption and what that might look like. And, no one certainly talked to me about what could happen to me – physically, emotionally, spiritually - after my abortion.

No one told me that I could feel such intense hatred and disgust for myself and for what I had done. To deal with those feelings and to try to forget what I had done, I drank heavily for a number of years following my abortion. With the drinking came promiscuity and other self-destructive behaviors. I was terrified of God's judgment and knew that I deserved whatever I got. I was sure that if anyone knew this about me, that they could never accept me or love me. And, I was certain that I would never be able to have children.

I did go on to get married and have three children. I was extremely fearful during my pregnancies that something would happen to the baby or that something would be 'wrong' with them when they were born. I became a very strict, perfectionist mother – insisting that my children be perfectly clean, perfectly well behaved, etc... a most unrealistic expectation.

I threw myself into doing good things for other people and trying to be the best person that I could be, in an attempt to make up somehow for my abortion. I never spoke about the abortion...I couldn't even say the word 'abortion' out loud. Every time I drove by a pro-life billboard or heard something about abortion, I felt like a hot spear went right through me. After many years, I was exhausted by living this way and found myself in a pit of despair and depression. I was diagnosed with a major depressive disorder, combined with anxiety and was placed on medication. Several years ago, a counselor that I saw identified my abortion as the major source of my issues. I really didn't want to hear that and she made me kind of mad. But, she was right. Once I had turned to God and fully admitted to Him what I had done, I was finally free from fear and found peace. By that time, however, I had kept this secret for 20 years. It was a long time to be stuck in that place of isolation and fear and shame.

I am a nurse. In the medical profession, informed consent for procedures and surgeries is extremely thorough. Every possible risk or side effect, no matter how slight the risk, is disclosed to the patient BEFORE they proceed. Even when my own children had their wisdom teeth out, I remember clearly being told that a risk with anesthesia could be death. With abortion, things are much different. Risks are minimized, if discussed at all. There is another developing human being involved in this circumstance. As such, care should be taken so that the OTHER person in the circumstance (i.e. the mother) understands clearly all that she can about that little one. I remember when I discovered after my abortion that my baby's heart was already beating when he was aborted. I was devastated. A heartbeat is how we determine that someone is still alive. If I had known this before my abortion, I just do not believe that I could have gone through with it. It is simply not good health care

for women to avoid giving them the best information available about the risks and consequences of abortion, as well as explaining the stage of fetal development that their child is at.

Abortion hurts women. It hurts men, children and families. Abortion hurts society and it hurt me.

Kay Kiefer
925 6th Avenue West
West Fargo, ND 58078
(701) 793-1044
rkieferfam@msn.com

EXHIBIT B-2

AFFIDAVIT

THE STATE OF Minnesota §
COURT OF Hennepin §

Before me, the undersigned authority, on this day personally appeared Ann Marie Cosgrove, (Print Name) who, being by me duly sworn, upon oath, stated the following facts:

My name is Ann Marie Cosgrove (Print Name). My address is

I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true: See attached

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

In the late summer of 1983 I, Ann Marie Cosgrove, became pregnant. I was 26 years old and not married at the time. I went to a county clinic in downtown Minneapolis to get a free pregnancy test done. It came back positive. When the doctor told me I was pregnant I immediately started to cry. The doctor asked me "this is not good news"? I said, "no, I am not married". She proceeded to tell me only about the abortion clinic down the street. I left very upset and with no other information other than the information about the abortion clinic.

I went over to my boyfriend's house and told him I was pregnant. At the time both of us were doing drugs and working part-time at a bar. We talked about it and decided together to go through with the abortion. I made the decision to go through with it out of fear he would leave and having to raise a child by myself. He made the decision out of fear of not being ready.

We went to the abortion clinic early November 1983. When the nurse called me to talk (give me counseling) about why I was having the abortion I told her because I was on drugs. She then said something to the effect of "do you plan on getting off of drugs, what if you get pregnant again" I told her I was getting off drugs and left it at that". That was the only thing that was talked about in my counseling session before the abortion.

While I lay on the table to have the abortion I said out loud "forgive me God for what I am about to do" and started to cry. I told the doctor I was going to faint. He started to yell and scream at me "No, no you cannot do this. If you faint we cannot go on with the procedure" "Nurse, keep her awake, keep her awake" His tone was very angry. The abortion hurt while I was having it done.

Immediately afterwards I felt empty and very sad. The darkness never left me for twelve years. I always felt a feeling of a heavy burden weighting on my soul. My life became filled with feelings of regrets, mistrust and depression. Instead of getting off drugs I got more into them. I started smoking coke and accepting abusive behavior from my boyfriend. I felt like I deserved to be treated as badly as he treated me. I had no self-respect or self esteem. I could not "Snap out of it" or "Get over it", as my boyfriend would tell me over and over again.

I would take showers just so I could cry away the pain, trying silently to scream the shame away. I could not tell if it was the water or tears running down my face. I would lie awake at night thinking about the baby wondering was it a boy or girl. What would the child look like? Deep seeded sadness was my constant companion. Feelings of worthlessness raised and fell throughout my soul making my life a sea saw of emotions. Not feeling connected to any real joy for so many years made me untrusting of my own sanity.

From the outside everything looked fine. I would share the secret with others whom I knew had abortions. Everytime I told someone I could feel myself damning myself more. The guilt and shame plied deeply onto my soul crushing its true existence, leaving me with feelings of being less and choking on my own choice. A choice that I made without all of the information I should have had. A choice that haunted for me for what seems like a lifetime. A choice that if I had access to other information I might not of made. A choice, had it not been a choice, I would have no need to be writing this today.

The depth of my drug use became very clear to me as I had clung to my boyfriend's leg begging him to give me the crack pipe. I scoured every nook and cranny to find a pipe with residue or a chunk of crack that might have fallen down the sofa or on the floor. I knew I had to leave, leave the memories, leave the feelings, and leave the emptiness of my life behind. I had to leave the only one who shared these memories and feelings. The only one who was my accomplice in the crime we had committed. I moved to the Virgin Islands to escape the torment and the shadows that haunted me from every corner of my being.

The move was very good for me. I did get clean and have been off drugs ever since Dec 4th, 1984. My child did not die in vain. I moved back to Minnesota and married the man who drove me and sat with me at the abortion clinic. I wanted to right a wrong. We would have an another child to make up for what we

did. I did get pregnant again and lost the baby by God's choice. I can honestly say my feelings about losing this baby is so different than choosing to abort my other child.

My soul knows the difference between what I choose to do and what God chooses to do. There is no guilt, shame or worthless associated with my child God chooses to take. Yes, there is pain because of the loss, but it has not paralyzed me.

My marriage did not make it. The man whom I feared would leave me without the abortion left because of it. My husband told me I loved him too much. Imagine that, I killed our child for him. I guess he was right. I became in his words "A green eyed jealous monster" What he saw was a crazy woman who did not want to trust, love or live. He did not realize I was drowning in a cesspool of shame, guilt and worthlessness. I had no where to run, no where to hide, I was done and I wanted to die.

After he left I told myself I was sick and tired of being sick and tired. I went into therapy for three years for most of the three years I saw the therapist once a week. Throughout the sessions I pounded pillows, screamed and cried my heart and eyes out. My therapist was very good, but did not know how to help me with the deep seeded pain and emotions from the abortion. One day she threw her hands up and said, "You are just going to have to learn to live with this". I said, "How does someone learn to live with murdering their own child"?

It was not until I came back into the Catholic Church and had a miraculous healing take place through the Divine Mercy Chaplet, which I had never heard of before. I had picked up a little leaflet about it on a Sunday after church. That same day at 10:30pm I was reading and looking through the Divine Mercy leaflet. It said on the bottom "even the most hardened sinner, if they say this chaplet just once, would have my Most Divine Mercy set upon them.

I took down a rosary dusted it off, got on my knees and began to pray. As I prayed I could feel something come up from a place that I had no idea existed. It was as if I was feeling this place for the very first time. As I prayed I cried like I had never shed a tear before and this "thing" was leaving my body. I could feel it come up through my heart, my throat and out my mouth. It felt like the size of a softball and the moment it came out my mouth, the place where it had been all those years was filled with joy and peace. The shame and guilt was lifted out of me.

Healing is a process. Yes, I had a miraculous healing, but I still needed to work through the anger and be able to grieve the death of my child and have him recognized as a human being. Everyday I think about him and who he would be. I work with children and many times find myself looking at those beautiful awesome little people and think that about my son.

Being childless, single, 43, and not anywhere near a relationship, it still can be very hard. I still cry my eyes out. I still ask him to forgive me. I still want to take it all back, but I can't.

When you go to a dentist to have a tooth pulled you get more information about complications and side effects than you would when you go to an abortion mill for an abortion. If a woman gets breast implants and she does not like them anymore or something goes wrong, she can take them out. Abortion is terminal, a child dies and a woman is wounded forever.

In this day and age when everyone and her brother are coming out of one closet or another, the woman who has had an abortion has to stay in. Society says, you made your bed, you had your choice (a choice with no real information) now you must lie in it. Well, I am done lying down and I am done hiding. Let our children be recognized as the human beings they are. Let our voices be heard. Damn it, let us out!!!!

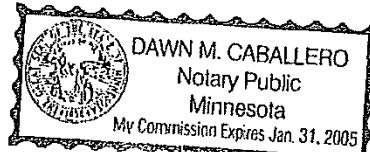
Ann Marie Cosgrove

I have read the above and foregoing statement and the same is true and correct.

SIGNED this 27th day of December, 2001.

Please use my : full name.
 initials only.

Dawn Marie Caballero
My signature evidences my authorization to use this affidavit for all purposes.



SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 27 day
of December, 2001.

Dawn M. Caballero
Notary Public

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of MN

County of Anoka

BEFORE ME, the undersigned authority, on this day personally appeared Beverly A. Green (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: Feb. 1979 Meadowbrook St. Louis Park
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? NO If not, explain: They never told me how awful I would feel for the rest of my life.
- 3) Were you adequately informed of the consequences of abortion? NO. not at all. They didn't care - they just wanted my money.
- 4) Were you informed of any link between abortion and breast cancer? NO Have you had breast cancer? NO
- 5) Did anyone pressure you into having an abortion? YES If so, who? My boyfriend's mother. She said it was just tissue and contraception after the fact. And that we were young and shouldn't let this pregnancy get in our way
- 6) How has your abortion affected you? I went into a black tunnel for years. Started using drugs, drinking, more promiscuity, very insociable, hated myself - the list goes on...
- 7) How has your abortion affected others in your life? My husband feels my suffering. My parents were devastated.
- 8) Based on your own experiences, what would you tell a woman considering an abortion? It's not a quick and easy solution - Don't do it! It will haunt you the rest of your life. Two wrongs won't make a right. They don't tell you how awful it is and that you will never soon the loss of your baby.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? It's not the "illegal" abortions that hurt women - It's abortion. Our constitution should protect the rights of all people - born, old and unborn. Harry Blackmun himself stated that they would have a hard time writing the law for abortion if it were proven that the fetus is actually a baby - well in this day and age - that's a "no brainer!"

Please use my : full name.
 initials only.

Beverly A. Green
 My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 5th day of March, 2003.

JULIA T. TAUBE

Notary Public-Minnesota

Anoka County

My Commission Expires Jan. 31, 2005

NOTARY PUBLIC

Julia T. Taube

Please access these forms on our website: www.operationnotary.org or make copies of this form and distribute.
 Return to: Texas Justice Foundation, 3122 Datapoint, Suite 312, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of Minnesota

County of M. H. Lacs

BEFORE ME, the undersigned authority, on this day personally appeared Bonnie Jean Polinder (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: In a clinic in Robbinsdale, Minn.
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? Not at all.
All I was asked is "are you sure you want to do this?" And "are you ready?"
- 3) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No
- 4) Did anyone pressure you into having an abortion? Yes If so, who? My husband at the time told me to choose between him and the baby. And if I loved him, I better choose him, or he would leave me.
- 5) How has your abortion affected you? It has effected every area in my life. For over 10 yrs, I had been in abusive relationships, my self worth was ----. I was a total mess for over 10 yrs. Then I became a volunteer at a "life choices center". There I went to "ACE" counseling. And there I learned why I had done things. I faced a lot of issues I never knew I had. I put them in the back of my head, til then. I had many health problems as well. Now, I try to witness about abortion to whoever I can. I would look in the mirror at self.
- 6) How has your abortion affected others in your life? It has hurt many of my family. But, they have forgiven me & helped me when I told them about it.
- 7) Based on your own experiences, what would you tell a woman considering an abortion? That abortion IS murder and that there are many, many side effects or complications of abortion. That there is another way, adoption. (I have done this w/ 2) And that there is a lot emotional problems, maybe not right away but, sooner or later it catches up with you.
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? Murder is any other aspect is murder and there are other consequences. Abortion is the murder of a human life and murder of this special gift to us. And to consider all the effects, including emotional effects of abortion. If they make it legal, they are now introducing & giving you not their word.

"I have read the above and foregoing statement and the same is true and correct."

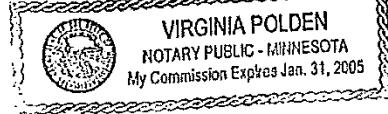
- I want to tell my story.
I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.

Bonnie Jean Polinder

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 11th day of March, 2003.



NOTARY PUBLIC

Virginia Polden

You may also answer these questions by telephone with an Operation Outcry Representative at 1-877-247-7582.
Please access these forms on our website: www.operationoutcry.org or make copies of this form and distribute.
Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT*To be filled out by women who have had an abortion.*The State of MinnesotaCounty of Washington

AUG 09 2002

BEFORE ME, the undersigned authority, on this day personally appeared J A A (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: Meadow Brook Hospital Minneapolis 1985
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? No. I did speak with a 'counselor' at the clinic but she asked more questions and was not specific about the consequences.
- 4) Were you informed of any link between abortion and breast cancer? no Have you had breast cancer? no
- 5) Did anyone pressure you into having an abortion? no If so, who?

- 6) How has your abortion affected you? I suffered for twelve years with severe shame, unconfessed guilt, voices of condemnation in my mind every day for much of that time. The abortion affected negatively almost every relationship I had - husband (who did not understand the pain I was going through), my children who I could not freely love due to the pain of abortion, my parents (I was not truthful with them about the secret of abortion until later on) and most of all the abortion affected my relationship with God. I was separated from him by my sin and shame.
- 7) How has your abortion affected others in your life? Until I received healing, the abortion negatively affected almost every relationship in my life.
- 8) Based on your own experiences, what would you tell a woman considering an abortion? Do not have an abortion. The pain of the procedure is nothing compared to the years of pain afterward. If you can not keep your child, give it up for adoption.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? I used to believe that if something was legal it would be ok to do. Even though abortion is now legal it causes great damage to the mother, siblings, husband, families and our whole society.

"I have read the above and foregoing statement and the same is true and correct."

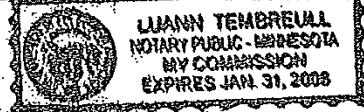
Please use my : full name.
 initials only.

S J A.G

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SIGNED before me, the undersigned authority, this the 29 day of July, 2002.



NOTARY PUBLIC

Juann Tembreull

You may also answer these questions by telephone with an Operation Outcry Representative at 1-877-247-7582.
 Please access these forms on our website: www.operationoutcry.org or make copies of this form and distribute.
 Return to Texas Justice Foundation, 9122 Datapoint, Suite 812, San Antonio, TX 78229.

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of Minnesota

County of Hennepin

BEFORE ME, the undersigned authority, on this day personally appeared Julie Atkinson (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

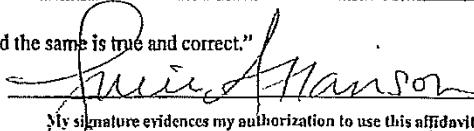
"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: 1984 - Minneapolis, MN
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? NO If not, explain: I was not told that...that tissue and those cells belonged to my aborted daughter Erin Marie Hartigan.
- 3) Were you adequately informed of the consequences of abortion? No. They did not tell me that I would put myself in an emotional prison. They did not tell me that I would suffer from any post traumatic disorders like uncontrollable crying, destruction, emptiness, breast cancer, shame & guilt.
- 4) Were you informed of any link between abortion and breast cancer? NO Have you had breast cancer? YES God supernaturally healed me of breast cancer after I went through P.A.T.H. (Post Abortion Trauma Healing).
- 5) Did anyone pressure you into having an abortion? NO If so, who? I made my own decision.
- 6) How has your abortion affected you? As explained in #3, I am suffering with life-long consequences
I am suffering with life-long consequences
- 7) How has your abortion affected others in your life? My only child is in heaven. It took her life and voice away.
- 8) Based on your own experiences, what would you tell a woman considering an abortion? I would give her my testimony and hope she sees the baby as a child and a gift from God and not a curse. Then, I would call all the prayer chains and people that I know to pray that the baby not be aborted.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? I thought abortion was the right thing to do because it was legal; the court has misled me and others. Now that we are speaking out of these harmful effects they should listen. The law was originally put in place because women complained about the harmful effects of illegal abortions now we are telling them about the harmful effects of legal abortions.

"I have read the above and foregoing statement and the same is true and correct."

Please use my : full name.

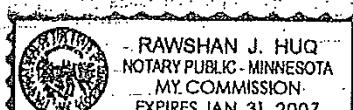
initials only.



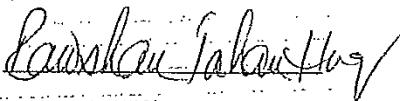
My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 22 day of January, 2003



NOTARY PUBLIC



Please access these forms on our website: www.operationnotary.org or make copies of this form and distribute.
Return to Texas Justice Foundation, 3122 Datapoint, Suite 312, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of Minnesota

County of Washington

BEFORE ME, the undersigned authority, on this day personally appeared K. L. H. (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: Dec. 6, 7, or 8 1979 approx
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? no consequences mentioned if I remember correctly - called "vacuuming" and "contents of uterus"
- 3) Were you informed of any link between abortion and breast cancer? NO Have you had breast cancer? NO. Good health
- 4) Did anyone pressure you into having an abortion? NO If so, who? me from troubles

- 5) How has your abortion affected you? It has made me feel utterly ashamed and contemptible, wretched and horrid, full of pain so acute that I just blocked it out as best as I could but it was always a festering open malignant sore

- 6) How has your abortion affected others in your life? because I felt so worthless and contemptible I put up with base pretty, selfish, domineering behavior in romantic relationships which I may not have so easily accepted
- 7) Based on your own experiences, what would you tell a woman considering an abortion? NO NO and NO
Don't do it you'll be sorry won't wish it on my worst enemy. Why open yourself up to such a world of pain
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? No, are you draft? Listen to the pain of the people who've been through it

"I have read the above and foregoing statement and the same is true and correct."

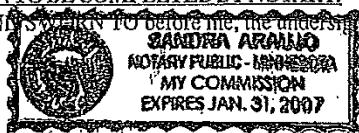
- I want to tell my story.
I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.

K L H

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 28 day of February, 2003.



NOTARY PUBLIC

P. Whalen

You may also answer these questions by telephone with an Operation Outcry Representative at 1-877-247-7582.
Please access these forms on our website: www.operationoutcry.org or make copies of this form and distribute.
Return to Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

(Questions For WOMEN Who Have Undergone Abortion)

The State of Minnesota

County of Hennepin

BEFORE ME, the undersigned authority, on this day personally appeared Karen A. Bellmore (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: April 2, 1982 at Midwest Women's Health Center in Minneapolis, MN.
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? If not, explain: I knew it ended pregnancy but I wasn't informed of exactly how it was done and I don't think I was old enough to understand the impact of such a decision.
- 3) Were you adequately informed of the consequences of abortion? No. I was told it was safer, medically, to have an abortion than to carry a baby full term. But the biggest consequence is living the rest of your life with enormous guilt, no one informed me of that.
- 4) Were you informed of any link between abortion and breast cancer? Have you had breast cancer? No
- 5) Did anyone pressure you into having an abortion? If so, who? My father encouraged me to abort because he thought it would be best for my future to finish college, and thought it would be too hard on me to give my baby for adoption; he was wrong. I also felt pressured because I thought my baby was unhealthy & it was O.K. for that circumstance.
- 6) How has your abortion affected you? Very negative. I was sad + depressed for years, and I'm still very saddened that I made such a terrible decision. The worst part is the guilt + anger within. It's never the right choice
- 7) How has your abortion affected others in your life? Very few people know + none speaks of it.
- 8) Based on your own experiences, what would you tell a woman thinking of having an abortion? Don't do it! You will regret it the rest of your life. No matter what the reason, don't have an abortion because you would be killing your own child. I believe it is not a person's decision who lives + dies - only God's. You will regret it.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? It's WRONG! Murder should be illegal no matter what age, size, or development of an individual life. If it's illegal to kill a baby after birth, then it should be illegal before birth. It's still the same life. Humans should not have legal access to abortion. Look at your own child or someone else's & imagine killing them before they had a chance at life. "I have read the above and foregoing statement and the same is true and correct."

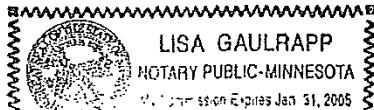
Please use my : full name.

Initials only.

Karen A. Bellmore

My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 14 day of December, 2004.



Lisa Gaulrapp

NOTARY PUBLIC

Please return this form to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

To be filled out by women who have had an abortion:

The State of MN
County of Hennepin

AFFIDAVIT

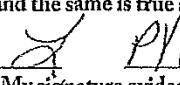
BEFORE ME, the undersigned authority, on this day personally appeared L N (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

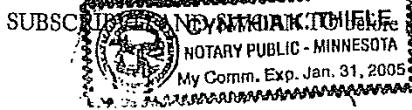
"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true."

1. Tell when and where your abortion occurred: Clinic in downtown Mpls, 3 March 1976
2. Were you adequately informed of the nature of abortion, what it is, what it does? If not, explain: NO
very brief, passed over, minimized
3. Were you adequately informed of the consequences of abortion? NO
4. Were you informed of any link between abortion and breast cancer? NO
Have you had breast cancer? NO
5. Did anyone pressure you into having an abortion? NO
If so, who?
6. How has your abortion affected you? depression, guilt emotional trauma
7. How has your abortion affected others in your life? my ex-spouse (now ex) my children
my parents, all having visited & seen my pain
8. Based on your experiences, what would you tell a woman considering an abortion? The emotional pain
is often long lasting
9. Based on your own experience, what would you tell a court that believes abortion should be legal? What right
do we have to take a life?

"I have read the above and foregoing statement and the same is true and correct."

Please use my: full name.
 initials only.


My signature evidences my authorization to use this affidavit for all purposes.



Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of Minnesota
County of Hennepin

BEFORE ME, the undersigned authority, on this day personally appeared Lauralee Peterson (print name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: December 1981
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? No, I was not told anything about fetal development or the devastating emotional fallout that was possible afterwards.
- 3) Were you informed of any link between abortion and breast cancer? NO Have you had breast cancer? NO
- 4) Did anyone pressure you into having an abortion? YES If so, who? The counselors at the teen clinic told me it would solve my problem and they offered no alternatives.
- 5) How has your abortion affected you? My abortion has given me 22 years of sorrow and regret. When I realized the development of my child and the fact that abortion stopped my child's beating heart I was filled with anger and sorrow. At the age of 16 I was not mature enough to make such a decision. My other children also know they have a missing sibling.
- 6) How has your abortion affected others in your life? It caused my boyfriend and me to fight bitterly for years and it nearly destroyed our marriage until we got post-abortion counseling.
- 7) Based on your own experiences, what would you tell a woman considering an abortion? Abortion kills - solves nothing. I would tell her she is already a mother, her choice is to kill, to parent or to give the child for adoption. Abortion is permanent, can never be changed or replaced - the grief it causes never stops.
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? A government's job is to protect innocent life and to ensure justice. Abortion is a grave injustice, like slavery it relegates some people as less than human. It is completely immoral. It is murder.

"I have read the above and foregoing statement and the same is true and correct."

- I want to tell my story.
I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.

Lauralee M Peterson

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 3rd day of March, 2003.



NOTARY PUBLIC

Dawn Lahm

You may also answer these questions by telephone with an Operation Ovary Representative at 1-877-247-7582.

Please access these forms on our website: www.operationnotary.org or make copies of this form and distribute.

Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of Minnesota

County of Ramsey

BEFORE ME, the undersigned authority, on this day personally appeared M. M. P.,
who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: February 1981 Portland, OR
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? No If not, explain: I had no idea of fetal development, the true nature of the abortion procedure, or the impact it would have for years to come. I was not informed there were other options available.
- 3) Were you adequately informed of the consequences of abortion? I thought the only consequence would be tremendous relief and freedom from worry.
- 4) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No
- 5) Did anyone pressure you into having an abortion? Yes If so, who? Father of the baby, his parents, and my parents (it's one of the very few times my parents ever insisted on paying for something -)
- 6) How has your abortion affected you? extreme isolation, depression, anxiety, grief for someone who should be alive but is not because of my "choice"
- 7) How has your abortion affected others in your life? how are any people affected by having a crippled, half-person daily in their midst?
- 8) Based on your own experiences, what would you tell a woman considering an abortion? I would describe fetal development and ensure she understood she was not alone in her situation but that there were many options, resources and people
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? Abortion is murder. were it not for the blood of Jesus, the blood on my hands would condemn me, rightfully, to an eternity of sadness and sorrow.

"I have read the above and foregoing statement and the same is true and correct."

Please use my : full name.
 initials only.

M. M. P. My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 7th day of December, 2001.



NOTARY PUBLIC

*Please access these forms on our website: www.operationnotary.org or make copies of this form and distribute.
Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229*

AFFIDAVIT

THE STATE OF _____

§

COUNTY OF _____

§

Before me, the undersigned authority, on this day personally appeared Tammy
Rose Dempsey (Print Name) who, being by me duly sworn, upon oath, stated the following
facts:

My name is Tammy R. Dempsey (Print Name). My address is

I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

December 11, 2001

My name is Tammy Dempsey and I am a prime candidate for the devastation that an abortion can cause. I really don't know where to start. I was the young age of 19, and had already been a mom for two years, when I found myself pregnant again with a child that I had no idea how to care for. What I mean by this is I was uneducated, unemployed and very depressed about being pregnant again. I depended on the welfare system to help me support my first child. I can't give to much detail about how the subject came up about abortion because I don't remember. There are still several areas of that part of my life that are unclear. It wasn't until I read another mothers story that I realized her and I had our abortions at the same clinic. I had totally blocked the clinic name from my memory. But as soon as I saw Meadowbrook Clinic I knew that was the same place that I had walked into 24 years prior. Although I am still not able to picture any details about the actual procedure I do remember the darkness I felt for 16 years because of that freedom to choose to murder my baby. I feel a need to share a bit of my upbringing for the reason of embracing the whole picture of guilt that comes behind a decision that seems to be the only way out at the time. I was raised in a Catholic home. My parents adopted four children because they could not have their own. Upon going to my parents in desperation with the crisis of another illegitimate child was not the brightest thing I could of done. When I was 16 and pregnant with my first child they tried to ship me away to an unwed mothers home. The unwed mothers home said they wanted to help me by taking my baby from me and put him in foster care until I learned to be a mother. This was very distasteful to me because of my own adoption. I don't mean to get off track but I do feel this pertinent to my story. This is only a very small part of my growing up years of being an adoptive child. But the point being is it was in my head when I decided to go through with the abortion that I could not adopt my baby out because of all the sadness I felt as an adopted child.

What I was not aware of and of course not counseled about is the years of agony and bondage an abortion has on a woman's life. It is only when you really comes to terms with the fact that you murdered your child and forgive yourself and feel forgiven by God can a person start to gain a life that is deserved.

As I mentioned before I was 19 when I choose to murder. From that age until I was 34 I never talked about my abortion on any kind of healing manner. In fact I can only remember one person I talked to about the abortion at all. I steadily drank and did drugs until I was 32. The abortion was one of the main reasons for my continual use of alcohol and drugs. At the time you are abusing your body, mind, and spirit with drugs you are unaware of the reason you abuse yourself and why you allow others to do the same. The reason why you are unaware is because the pain of murdering your own child is an unbearable thing to deal with. You somehow along the way learn a very dangerous survival skill of stuffing this event to the very pit of your soul. Not ever wanting it to surface for the fear of it showing all over your whole being. SHAME, SHAME, SHAME. I had endless dead end relationships always looking to be loved. But never even knowing what love was. Another feeling that stems from an abortion but you don't realize it at the time is most of the time you think that I do not deserve to be loved. My main point that I would like to come across as strong as possible in making abortion illegal is, how many women do you think are out there that have had abortions and are

still suffering from not ever being told that this decision will haunt them the rest of their life????? "You will allow people to abuse you for your decision." "You will abuse others because of a decision you made years ago." You have a great chance of becoming a drug addict, alcoholic, mentally ill, or quite possible loss your mind in trying to find out what the hell is going on with your life.

I do not remember anybody at the clinic or my mom or dad explaining to me what the long-term consequences would be. I'm sure they had no idea. There are millions of women who now know that murdering your child and never going to jail was a fairytale. I was in prison for 16 years. Thank God for His grace and mercy on us sinners. I am forgiven and out of the prison of my mind and free to say yes I had an abortion and it was the biggest mistake I have ever made in my entire life.

A handwritten signature in black ink that reads "Tammy Demesey". The signature is fluid and cursive, with "Tammy" on top and "Demesey" below it, both starting with a capital letter.

I have read the above and foregoing statement and the same is true and correct.

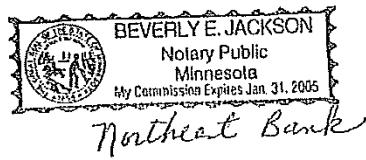
SIGNED this 21ST day of December, 2001.

Please use my full name,
initials only. T.D.

Dammy R. Dempsey
My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 21 day
of December, 2001.

Beverly E. Jackson
Notary Public



Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

THE STATE OF Minnesota
COUNTY OF Anoka

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Before me, the undersigned authority, on this day personally appeared Tammy
Dempsey, (Print Name) who, being by me duly sworn, upon oath, stated the following
facts:

My name is Tammy Dempsey (Print Name). My address is

over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I
have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm,
that the following facts are true:

See Attached

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

December 10, 2001

OPERATION
DEC 15 2001
OUTCRY

I have enclosed my story to be used for the purpose of Operation Outcry. I feel the need to share with you my intense desire to be a part of this outreach. Throughout the last several months, I have had the distinct privilege to be involved with a handful of opportunities that have had the purpose of shedding light on this horrific topic. Recently I thought to myself that if everyone everywhere who was willing to share their disrupted lives in regard to abortion could come together and really detail the angst that it's caused, there could be absolutely no reason that a court could overlook the evidence that I know is as compelling as my story to overturn this demised state that our society has deemed to be a choice. Not long after that thought, a girlfriend told me about Operation Outcry. My prayer had been heard and answered!!!! I have to admit that I did procrastinate some as this is not an easy box to open. There is much pain in the exposure of one's deepest darkest secrets. However, I know that the hidden shame is a by product and even the fuel of the continuance of this atrocity that is happening time and time again. I thought of the children that are never going to see life. I thought of the women that will find themselves haunted by a shroud of something that they may never be able to put their finger on. I thought of our society that feels the ripple of dysfunction that comes from the aftermath of the trauma of taking ones' own life that had yet to be born although did live internally within them. I thought of God and how He must feel to be insulted by the very rejection of His greatest gift, Life. I knew that I could not live with myself and not do something to let others know just how incredibly important it is that we stop this insane, selfish, murdering of our children. I've never protested an abortion clinic. I've never judged those that have walked out of them. I have however wept and grieved deeply for our losses and the ill guided actions that have promised a relief of a difficult situation. I want to be involved in the change that needs to take place immediately in order to save those that are on the brink of making a decision that will alter their lives permanently to a point of maybe not even being able to live anymore. In my opinion, if the research were to be done, we would find great undeniable connections to severe physical and mental illnesses that are directly related and caused from the eliminating of our children. It goes against our natural beings to terminate life within us, however society says it's okay so we just assume that they are right because it is legal. It is so incredibly twisted however and that is the reason that it continues, because we have not spoke up to the point of being heard loud enough so that our cries of pain are so deafening to others that it can no longer be ignored. I want to be a part of the volume that rings so loudly in others ears that they can

My name is Tammy Dempsey and I am 31 years old. My story begins over half of my life ago and has yet to find a completed end. In October of 1986, I was sixteen years old and pregnant. Being in an obviously undesirable situation, I was afraid and confused. A friend influenced me to have an abortion, deeming it to be the only way out of a horrible predicament. Being underage and not wanting to share with my parents my situation, I was led through the process of emancipation into being able to make an adult decision. I went before a judge to request my being able to have an abortion without telling my parents. My advocate at the time coached me as to what to say in order to build compelling evidence that the involvement of my parents would cause them to throw me out of the house. That was not true at all, they would not have done that. The judge sided with me though and agreed it was indeed in my best interest to have the abortion and not tell them anything about it. I went to the clinic, Meadowbrook in St. Louis Park, MN and the procedure took place. I was completely emotionally numbed during the entire process. Matter of fact, it appeared that I was so in control and unaffected that when they (the administrative staff) insisted that I stay for a couple of hours and drink juice in order to insure that my blood lost didn't cause a fainting spell, I balked at the idea and resisted their suggestion. They didn't let me leave without first monitoring my blood pressure and heart beat in order to make sure I was "healthy" enough to go. I went home and pretended as if life was normal and I hadn't just terminated a life. That evening though, the cries of a baby, my baby would not let me sleep. The tormented screams that rang through my head over the next couple of weeks were too much to bear and I started drowning them in alcohol and drugs. Anything I could get my hands on in order to quiet the pain that echoed in my heart, my mind and my soul. A reckless endangerment of my own life ensued and I found myself in one promiscuous situation after another. I quit going to school and worked and partied full time instead. I couldn't bear the thought that everyone at my high school must know of what I had done. After numerous sexual encounters some that were not only unwelcome, but also violating, left their marks on my being to a point that my worth had nose-dived below zero. I met someone that paid enough attention to me most of the time and I was just 17, almost exactly but not quite a year after the abortion. We spent all of our time together and as a result I was pregnant again. Happy this time and excited about the future of a family we started planning the rest of our life together. This relationship though, was incredibly dysfunctional at best. The core elements of needs being met were enough to keep us together despite the persistent chemical abuse that never seemed to go far enough away. In my sixth month of pregnancy, I was so depressed that the only thoughts that kept me from taking my own life were those of the new life growing inside of me. I had made a commitment and I was responsible for this baby growing inside of me, I felt obligated to stay alive for that reason alone. At the time, I didn't put it together, I didn't realize that my nagging feelings of little value and no worth were due to the fact that I had taken the precious life of my own child and I didn't know that my not feeling "good enough" to be alive was directly due to my abruptly stopping the life of my first child. My baby boy was born healthy and without complications even though I feared the worst due to my intermittent using throughout the pregnancy. This is difficult to admit, although important to reveal because I believe that even though I loved this life inside of me, I still hated the shell in which he was growing to the point of still trying to block out the pain from the loss of my first child which I was directly to blame for. I went in the other direction of extremes after he



was born and stopped eating and started working out obsessively to the point of passing out in the shower one day. I was not healthy internally, even though I had been clean and sober for months out of the fear of causing harm to my child. Things grew worse again at home and my boyfriend, my baby's father, ended up in jail just six short months after he was born. I was pregnant again and alone with an infant that was 100% my responsibility. I couldn't bear the thought of bringing another child into what seemed to be a fatherless world. I didn't seek counsel of friends or family. I was heavily into healthy alternatives and I searched high and low for a "natural out" to my horrifying situation. Nothing worked. I was still pregnant and alone and 18 years old with a baby and no sense of a secure future. I made the decision to have an abortion against the request of the father who wanted to have our baby. It was simple and easy enough to make the appointment. As long as I had the cash, I could be rid of my problem and no questions asked this time by a judge or anyone else. It was my business and that is exactly what it turned into when the exchange of money for service took place. Little did I know that this experience would damage my soul and spirit as severely if not more than the first time. I still don't recall the procedure. I do recall though afterwards the emotional pain that came from making that decision. Once again I found myself overwhelmed by the realization that I was a murderer. I never really let it sink in, as soon as I felt even the closest sliver of pain, I was off and running to any kind of medication I could get my hands on in order to not feel anything at all. I succeeded in the pushing down of my emotional pain to the point of it becoming seemingly non existent. On the outside, I was a knock out. In shape, beautifully put together and quite the personality. On the inside, I was a disaster waiting to happen. I didn't realize then that the effort it was taking to keep all of this at bay was actually demolishing my physical and spiritual being. I went on with life as I knew it and started going to school for court reporting, all went well for the most part, I was excelling amongst and over my peers with little effort on my part. The nagging incompleteness was easily rendered as a by product of my unhealthy relationship. We bought a house and shortly afterwards I was pregnant again. I so did not want to have a baby right then. I wanted to finish school and begin a career that I was really not suited for, but I wanted to finish anyway. I secretly hoped and prayed for a natural termination, even though I had not made a conscious connection to the previous pain of my earlier decisions, I just knew that I could not have another abortion. I was blessed with a baby girl. After her birth, it was obvious that I would have to begin working full time in order to support our family due to the children's father not taking on his family obligations. I couldn't connect with this child. I was unable to get close to her in the sense of welcoming a new life into my world. It could easily be said that I resented having to care for a new life when my own was on its way to becoming something of worth and validation. We struggled and I started to have complications physically with my reproductive system afterwards. I went in for ultrasounds, and the physicians found tumors on my ovaries, cysts. They didn't think that surgery was necessary, the pain though was excruciating and it would wake me up in the middle of the night. It felt as though a metal baseball bat had found its way to shatter my pelvic region with such an impact that left me debilitated. I couldn't stand the obsessive preoccupation with another pregnancy anymore. I knew that I was obviously fertile and even though our relationship was incredibly rocky, the threat of another pregnancy was more than I could bear. I knew I didn't want to have any more children with this man and I also knew that if I ended up pregnant again I would be faced with yet

another horrifying decision to be made and I couldn't even fathom the thought of another abortion even though I was not connecting any pain to the previous ones at that time. I decided to shut down my reproductive system at the ripe old age of 21 years old. I realize now that in a desperate attempt to protect myself, I was also punishing myself for the past that still had it's grip on me. I was not in my eyes worthy to be a parent and even though to others, I was the model of a mother, I didn't feel that way inside. I felt that I had children on a loan and even though I loved them dearly, I still had this nagging feeling that they didn't belong to me because I didn't deserve them and therefore I couldn't allow myself to get too attached out of the fear that they would be taken from me at anytime because I really shouldn't have them to begin with. There are numerous chapters that could be written in between the time that it took in order for me to realize that my horribly dysfunctional way of living was not what the rest of the world had encountered. After many years of abuse and tormented living with my children's father, I went from one relationship to another sheerly to validate my being worthy of another's affections. When I finally found my way into the real world of people that existed on their talents and education I realized that I had been gifted with several talents that can make a difference in our world. Those gifts though, as real as they are were not enough for me to believe in myself because I still suffered from an incredibly low self esteem and self image. The one that is offered up after numerous conversations with oneself speaking negatively about who they are and why they don't deserve to be the recipient of a life gone good. Self sabotage continued to wreak havoc on my being and I couldn't get a grip on the fact that I was driving the vehicle of my life. I still told myself that I didn't deserve to be happy and I didn't deserve to have and receive love and because I had murdered two of my children I certainly didn't deserve to live. Presented with opportunities to excel I would start out at a pace far above or at the very least right in with others that had seemingly far better upbringings and education. Again though the inward knowing gnawed at me on a level that was undetectable to bring into focus as to what was really wrong. I went from one achievement and failure brought on by my own doings after another. I packed up my children and left this state that I thought for sure was my downfall. We moved and started over five times before leaving Minnesota for what I hoped was for good. We moved to the state of Washington and even though I was very ill upon arrival, nothing would stop me from moving forward to a life that I could create upon my own clean blank canvass. The children's father was in Washington as well with his new girlfriend and I leaned on them for support and they did the same except tenfold it seemed. Then it happened, I had returned home after five months to visit my only real love and after coming back from that weekend, I unraveled at a rate faster than a ball of twine being chased by a playful kitten. It was as if the three legged table that I set everything on so intricately balanced started to feel the weight of the world that it was no longer able to carry alone. I was alone and I was far away from any support that could have kept me teetering. I nosedived and went into what I now know was the beginning of post traumatic stress disorder. I was not in my mind anymore. It was as if I was suspended into the nothingness of the world that surrounded me and I fell apart. Bit by bit. Piece by piece. Even though I knew that I couldn't be pregnant, I went to the Dr. for a pregnancy test because I felt life moving within me. What was happening though, was the surfacing of the life that I had at once felt 12 years prior. It was absolutely amazing the physical manifestation that was going on inside of me. I went on line to find out how to

get my tubal ligation reversed, and what the chances were of my actually being pregnant even though I was unable to physically carry it out. I had three very close friends within a two week period of time tell me they were pregnant and only one chose to continue with the pregnancy. The other two I begged and pleaded with, telling them that I would do anything at all in order to help them and I would even pack up and come home and take care of their babies in order to save them from death. They declined. I was heartbroken and then, as soon as it was decided, I could feel the literal deaths of these babies as I lay on my couch groaning and crying in pain, even though I was thousands of miles away, the connection was so strong. I found myself in the shower bawling and grieving for these babies that were not allowed to live. It was a part of the journey that I needed to go through in order to reconcile my losses. It took a long time to get to the point of actualization. More trips home, and more of my mind lost, I couldn't make a decision to stay or come home. Finally all of it came to an abrupt end and I found myself after returning from a weekend in Minnesota, at home in my apartment in Washington and trying to get focused on the neglected tasks that came from overwork and too much travel. There was a knock on my door and it was a neighbor that I didn't know but had seen and he took advantage of my ill state of mind, I was vulnerable and it showed. The sense of powerlessness that had been so natural to me by then was on its way to becoming another violation at the hands of a predator. I was drugged and sexually assaulted by this man. It was the earthshattering pinnacle of what sent me into a hospital for sanity and recovery. I was definitely going home. Obviously there are some details that could be included, however I think if you look at this from a higher level of comprehension, it would be safe to say that I allowed myself out of a state of desperation to be at the hands of one or many that could and did wreak havoc on my life. A pattern that seemed to be congruent with the rest of my life due to my inability to stand up and strong in situations that seemed to be out of my control. I relate all of this directly to my abortions. Sure there are other dysfunctional symptoms that surmounted from my life experiences, however I know without a doubt that there is a deep connection to my lack of stability due to my twisted state of mind even though to many I came across as having it all together. I came home to a place that reminded me of everything that I had ever done wrong in my life and decided that I needed to do something with those emotions that I had the natural gift of expressing. I wanted to act. Once again I was implanted with yet another seed of the hope of healing. I didn't know it at the time of course, however when I auditioned for a play that depicted a woman's remorse after the decision to have an abortion, once again I was at the mercy of my emotions that had controlled my life without them ever being exposed for what they truly were. I was blessed with the excruciating task of extracting each and every devastating effect that my decisions had caused and the task was extremely painful however I have been healed and I am so grateful for and to God and His neverending quest of reaching out to me and allowing me to come to terms of this life that involved 15 years of harboring self hate and destruction. There is so much more to my story and I would love to share it all with you for the distinct purpose of halting this disgusting alternative to life.



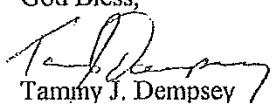
no longer say that it is a choice. It is debilitating and our world is suffering as a result. Is it not our Country's desire to be free? Is that not what our entire existence is based upon? It is indeed!!! Our freedom has been turned into a paradox due to our perceptions being twisted and it is causing millions to walk around in chains of bondage while they are being told that they are free.

If you think that I can be of service other than what I've already provided, I am willing to be more than an affidavit. I want it to stop. I hope that I have not been too wordy, and please forgive me if I have, this is important to me though and I didn't want to leave any stone uncovered.

You can contact me anytime, at home, at work, wherever...it does not matter when or where.

Thank you for your time in reviewing my information and thank you for your efforts in this incredibly important mission. I will be praying for your endeavors.

God Bless,

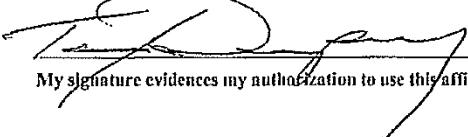


Tammy J. Dempsey

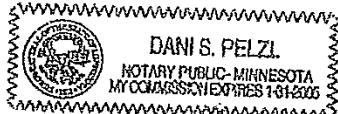
I have read the above and foregoing statement and the same is true and correct.

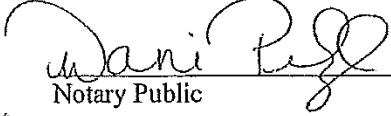
SIGNED this 10 day of December, 2001.

Please use my full name.
 initials only.


My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 10 day
of December, 2001.




Dani S. Pelzl
Notary Public

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

DECLARATION HOW MY ABORTION Affected ME

The State of MN

County of Ramsey

My name is Av M . I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Saint Paul MN

//1981

2. How many weeks pregnant were you?

2

3. What type of abortion was performed?

?

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

5. Were you adequately informed of the consequences of abortion?

Yes No

I was not informed about how guilty and depressed and deeply grieved I feel for years and years.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I have been very negatively affected emotionally, and physically.

10. How has your abortion affected others in your life?

My husband held it against me and our relationship never recovered from it.

11. Based upon your experience, what would you tell a woman considering abortion?

Don't do it. No matter what the new age philosophy says, or the government life starts at conception, and we will be held morally accountable.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

We don't have the right to take the life of the unborn child.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 8/20/2008

Please use my Initials Only

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION Affected ME

The State of MN

County of hennepin

My name is B d I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

minneapolis MN

05/02/2005

2. How many weeks pregnant were you?

8

3. What type of abortion was performed?

suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

5. Were you adequately informed of the consequences of abortion?

Yes No

I asked to see an ultrasound and they said there was nothing to see. I felt coached towards going through with it like they were making a sale. I came in not sure if I wanted to go through with it and left without my child.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I now have three children of my own and feel like someone's missing. Me and my husband talk about it every week and I cry about it all the time. I did not know the weight of my decision until I had my first child. I looked at him and sobbed for an hour, I knew when I saw him that the decision that I had made for his older sibling was murder. I felt like people had lied to me. They said it's just a fertilized egg. They lied, it was my baby.

10. How has your abortion affected others in your life?

My husband feels an extreme amount of guilt because it was his child. We had just started dating a month before I became pregnant and were not in love. Later we did fall in love, get married and have three beautiful children. We both would take it back in a heart beat if we could.

11. Based upon your experience, what would you tell a woman considering abortion?

That it is murder plain and simple. Conception is a miracle and ending it is a mistake. You can never understand the consequences of abortion until you have a child of your own. Every day that I am

blessed with my children I am always thinking of the one I tossed aside. I have enormous guilt.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

That an abortion at ANY time is the same as walking into a delivery room grabbing a baby from their mother arms and killing it. A child has arrived in this world the second they are conceived, we just don't get the gift of seeing them until they are born.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 10/8/2009

Please use my Initials Only

Signature

A handwritten signature consisting of two stylized letters, possibly 'B' and 'D'.

My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Ramsey

My name is B F I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Toronto, Canada

//1973

2. How many weeks pregnant were you?

3

3. What type of abortion was performed?

?

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

Nothing was explained

5. Were you adequately informed of the consequences of abortion?

Yes No

Nothing was explained

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

parents

9. How has abortion affected you?

I had a nervous breakdown after the abortion. I have never been the same. I now have bi-polar, OCD, and agoraphobia.

10. How has your abortion affected others in your life?

?

11. Based upon your experience, what would you tell a woman considering abortion?

Don't have one.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

It should not be legal!

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/17/2008

Please use my Initials Only

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

If someone you know has had an abortion, encourage them to complete this form.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN
County of Hennepin

"My name is BH. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? 5 abortions, MSP, MN
- 2) How many weeks pregnant were you? 14 What type of abortion was performed? 1st trimester abortion
- 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: Very little was said - about the psychological effects - Long term effects
- 4) Were you adequately informed of the consequences of abortion? No
- 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 6) Did anyone pressure you into having an abortion? Yes No If yes, who? _____
- 7) How has abortion affected you? The act of this - haunted me for years - Depression, shame, guilt - it consumed me.
- 8) How has your abortion affected others in your life? It's not talked about -
- 9) Based upon your experience, what would you tell a woman considering abortion? That it is the worst thing you could ever do - there are always other alternatives - Before marriage abstinence is the best thing.
- 10) Based on your own experience, what would you tell a court that believes abortion should be legal? It is taking an innocent life - it is murder, and only through Jesus Christ one can be totally freed out from it.

You may attach additional pages of testimony, if needed.

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this 16 day of August, 2008.

Please use my: Full name First name only Initials only

Signature: B H

You may contact me Do not contact me

My signature evidences my authorization
to use this declaration for all purposes

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

This form may be duplicated before completing. Forms can be downloaded from www.operationoutcry.org

Return To: The Justice Foundation · 8122 Datapoint Drive · Suite 812 · San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279) Need Help? 1-866-482-LIFE (5433)

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Sherburne

My name is Becky Boyer. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

St Louis Park MN

03/01/1985

2. How many weeks pregnant were you?

16

3. What type of abortion was performed?

D & C

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was not told about the trauma to my reproductive system that would not be discovered until years later. I had an ectopic pregnancy years later and found out I had massive scarring over my fallopian tubes.

5. Were you adequately informed of the consequences of abortion?

Yes No

I had no idea the emotional and spiritual trauma it would cause. I became alcoholic, emotionally unstable, and lived in constant grief for years. I had many failed marriages after and exhibited symptoms of post traumatic stress disorder.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

My boyfriend

9. How has abortion affected you?

I now know I am forgiven and can go on with my life, but abortion brought me to the brink of depression and almost suicide. I will always miss my baby and never forget what I allowed to happen to my body and my baby.

10. How has your abortion affected others in your life?

I had a series of failed relationships after the abortion. I ironically lost the man who pressured me into the abortion. I parent differently with the one child I do have. I am very protective of her and tend to spoil her like she is my atonement child.

11. Based upon your experience, what would you tell a woman considering abortion?

I would greatly urge and plead with her to continue the pregnancy with lots of support and consider adoption or keeping the baby.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

There is truth in disclosure for most medical procedures, but in abortion, they don't tell you the trauma it will cause. It should NOT be legal because it destroys two lives: the innocent baby, and the life of the mother.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 2/23/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Goodhue

My name is . I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

St. Louis Park MN

06/21/1984

2. How many weeks pregnant were you?

9

3. What type of abortion was performed?

D & C

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

No Answer

5. Were you adequately informed of the consequences of abortion?

Yes No

No Answer

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

No Answer

9. How has abortion affected you?

After my abortion, I plunged heavily into drinking, that was the short term reaction. I also internalized a lot of anger that came out in sarcasm to others. The long-term reaction was that when I had my next child, 4 years later, I was unable to bond with him because of the guilt and shame I carried from killing my own child. My husband was a better mother to my son, than I was able to be for the first 10 years of his life. It also took me 14 years, after my abortion to realize that I needed to get help in grieving the loss of my child.

10. How has your abortion affected others in your life?

Both of my living children, have had the loss of not bonding with their mother, early in life. After my

abortion, I helped 2 others get them. The child I aborted, died, not fulfilling it's God-given destiny.

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell her that, I thought abortion was the easy way out of a hard situation, but I was wrong. It's the hardest way out. Killing your child is never the answer to a pregnancy. You have to live with that decision for the rest of your life and it affects you, even if you don't know it. Pregnancy is not a disease to be cured or a problem to be gotten rid of. It's bringing a new life into the world. That child has a purpose. He or she could be the next person to develop a cure for cancer or AIDS. Don't destroy the gift, that God has given you, because you want to live your life, the way you wish, or you want to hide your sin, as I did. (My child was conceived on a one night stand, while I was married to another man.) If she didn't want to parent the child, I would encourage her to let other's parent, through her adopting her child out. There are countless people waiting for children to adopt! That choice brings life, not death, to both the mother and the baby.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

I believe the court to be wrong, from personal experience. You have seen the bumper sticker; Abortion, 1 dead, 1 wounded. That is the truth!! 50,000,000 babies dead to abortion. 50,000,000 would be Moms, running around in today's society, trying to numb their pain from it with prescription drugs, illegal drugs, alcohol, sexual or lots of other varieties of addictions. Ask them if they have had an abortion. Most of the time, they have. The pain from abortion stays with you, until you face it. Having an abortion, doesn't just make you un-pregnant, it makes you the mother of a dead child. At some point in your life, you have to go through the steps of grieving that loss. Medication alone, in the form of anti-depressants, isn't enough. Post-Traumatic Stress Disorder is the diagnosis. That's what abortion does to women. It's not a choice, it's a curse.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 2/24/2008

Please use my Full Name

Signature

C J G

My signature evidences my authorization to use this declaration for all purposes.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Goodhue

My name is Catherine Goggin. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

St. Louis Park MN

06/21/1984

2. How many weeks pregnant were you?

9

3. What type of abortion was performed?

D & C

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

No Answer

5. Were you adequately informed of the consequences of abortion?

Yes No

No Answer

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

No Answer

9. How has abortion affected you?

After my abortion, I plunged heavily into drinking, that was the short term reaction. I also internalized a lot of anger that came out in sarcasm to others. The long-term reaction was that when I had my next child, 4 years later, I was unable to bond with him because of the guilt and shame I carried from killing my own child. My husband was a better mother to my son, than I was able to be for the first 10 years of his life. It also took me 14 years, after my abortion to realize that I needed to get help in grieving the loss of my child.

10. How has your abortion affected others in your life?

Both of my living children, have had the loss of not bonding with their mother, early in life. After my

abortion, I helped 2 others get them. The child I aborted, died, not fulfilling it's God-given destiny.

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell her that, I thought abortion was the easy way out of a hard situation, but I was wrong. It's the hardest way out. Killing your child is never the answer to a pregnancy. You have to live with that decision for the rest of your life and it affects you, even if you don't know it. Pregnancy is not a disease to be cured or a problem to be gotten rid of. It's bringing a new life into the world. That child has a purpose. He or she could be the next person to develop a cure for cancer or AIDS. Don't destroy the gift, that God has given you, because you want to live your life, the way you wish, or you want to hide your sin, as I did. (My child was conceived on a one night stand, while I was married to another man.) If she didn't want to parent the child, I would encourage her to let other's parent, through her adopting her child out. There are countless people waiting for children to adopt! That choice brings life, not death, to both the mother and the baby.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

I believe the court to be wrong, from personal experience. You have seen the bumper sticker; Abortion, 1 dead, 1 wounded. That is the truth!! 50,000,000 babies dead to abortion. 50,000,000 would be Moms, running around in today's society, trying to numb their pain from it with prescription drugs, illegal drugs, alcohol, sexual or lots of other varieties of addictions. Ask them if they have had an abortion. Most of the time, they have. The pain from abortion stays with you, until you face it. Having an abortion, doesn't just make you un-pregnant, it makes you the mother of a dead child. At some point in your life, you have to go through the steps of grieving that loss. Medication alone, in the form of anti-depressants, isn't enough. Post-Traumatic Stress Disorder is the diagnosis. That's what abortion does to women. It's not a choice, it's a curse.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 2/24/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Hennipen

My name is Charlene Sirmon-hunt. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Memphis TN

05//1975

2. How many weeks pregnant were you?

13

3. What type of abortion was performed?

D and C type

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was not aware that a 13 week unborn baby was developed. At know time was I given developmental information. I was told that the tissue would be removed. Cutting and scraping was not understood/

5. Were you adequately informed of the consequences of abortion?

Yes No

I was never given data regarding the mental and emotional stress that could be involved. I was not given information on the dangers of a failed abortion.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

baby's father and my mother.

9. How has abortion affected you?

Once I acquired correct information on what abortion is and baby development I went into a state of depression. I used drugs to numb myself. I attempted suicide at 22. I was 17 went I aborted my child. This at the time was the best way of coping for me. It was a 20 years journey for me to gain healing and to forgive myself.

10. How has your abortion affected others in your life?

My children had to work through the grieving process of having a missing sibling. Struggling with forgiveness. Anger and also realizing that they were lucky to have been alive. How someone could decide that a life was not important.

11. Based upon your experience, what would you tell a woman considering abortion?

Even though it seems to be a easy answer to the problem, a much larger problem is birthed. The trade off is not worth what you will have to carry for life. You give birth to a child in 9 months- find a home for

it. There are people that are prepared to help with all of that. That is really the easy way to go. The mental and emotional care afterwards is not so easily fixed. Some do not survive it. As far as my faith-things have changed since 1975 abortion. I am now convinced that God expects us to value and protect life. So you will also have spiritual struggles.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

you do not know what you are allowing. Families suffer for years, please protect life.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 1/11/2013

Please use my Full Name

Signature

Cherlene Simon-hunt

My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION Affected ME

The State of MN

County of Pipestone

My name is Christina Soleta. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

01//1996

2. How many weeks pregnant were you?

16

3. What type of abortion was performed?

D&E

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

The procedure was never clearly explained to me. I had to have an ultrasound to determine how far along I was. I asked to see it and was told I was not allowed to.

5. Were you adequately informed of the consequences of abortion?

Yes No

No one explained that there could be any problems with the abortion, during or after. I was not even told about potential bleeding problems.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

the father of the baby

9. How has abortion affected you?

I was terribly depressed after my abortion. I hated myself for doing what I had done. I started having pain all over my body and was diagnosed with fibromyalgia. I thought I deserved to suffer because my baby suffered. I was in a bad relationship, my boyfriend was constantly cheating on me. I didn't leave him for almost four years because I thought I couldn't find anyone better. No decent man would want a woman like me who had her own child killed. I finally realized my repentance was worth something, and I left my boyfriend.

10. How has your abortion affected others in your life?

I don't share it with others. I did share it with my husband after we were married and started talking about having children. He accepted that I was sorry for doing it and would never want to do it again. Some day I will have to tell my children that I had an abortion, and I hope they will be understanding. I

dread that day, though. It will be tough and painful for them and for me.

11. Based upon your experience, what would you tell a woman considering abortion?

DO NOT DO IT!!! You will regret it. You need to know the facts. What is in your body is not a blob of tissue. It is a separate human being with its own unique DNA to prove it. This baby is a gift, whether it was meant for you or for another couple who desperately wants to adopt it. If you go through with the abortion, there are consequences, both physically and mentally. The abortion clinics are businesses, they are not there to help you find the best solution to help you. They exist solely for their own benefit and will not tell you the truth, nor are they required in most states to tell you the truth. Research all your options. So many who are willing to help you, you need to take advantage of their assistance. God loves you and your baby, too.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

In the preamble to the Constitution of the United States, our forefathers declare that one purpose of our country was to "secure the Blessings of Liberty to ourselves and our Posterity." The posterity of our nation are those who have not yet been born. Being ripped apart in your mother's womb is not a blessing of liberty, but a denial of the liberty of life. A child in a mother's womb is a separate human with the DNA to prove it. No one has the right to shed that baby's innocent blood. No one! It is time to undo the injustice and return to our forefathers intention of securing the blessings of liberty to our posterity.

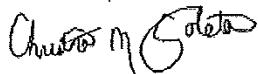
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 8/16/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION Affected ME

The State of MN

County of Blue Earth

My name is Deb I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Chicago IL

11/1973

2. How many weeks pregnant were you?

12

3. What type of abortion was performed?

suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I had NO IDEA my baby would be ripped limb from limb and torn apart as it was removed from my body.

5. Were you adequately informed of the consequences of abortion?

Yes No

I had no idea that I would spend years regretting my decision. I did not realize what I was doing to the baby. I was told it was a blob of cells.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

Planned Parenthood

9. How has abortion affected you?

Aborting my child has caused me grief and depression that lasted over 30 years. It was the year abortion became illegal, 1973, and I became pregnant on my 18th birthday. Planned Parenthood told me abortion was my only option and that at 12 weeks, there was no baby, just a blob of cells. That is such a LIE! They did not discuss any other options with me, such as adoption. I was too afraid to tell my parents and Planned Parenthood told me they would never need to know. I took the easy way out. I have hated myself and regretted my decision ever since. I murdered my child. That is a horrible thing to live with. When I finally married, I was unable to conceive a child. I spent years going through infertility testing, while my husband blamed the problem on my abortion. We eventually divorced.

10. How has your abortion affected others in your life?

It caused much discomfort during intercourse. It caused my husband to blame me for our infertility

problems. He eventually divorced me.

11. Based upon your experience, what would you tell a woman considering abortion?

You will regret it! Please consider adoption. It is very difficult to live with the knowledge that you murdered your own child.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

People are using abortion as a method of birth control. We have aborted an entire generation of people. The majority of people that have an abortion end up regretting it and live with years of depression. Many women become suicidal. In this day and age, with free birth control available nationwide, there is no reason to abort a child. Abortion destroys lives... the life of the unborn and the woman who has the abortion.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/5/2009

Please use my First Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

AFFIDAVIT

THE STATE OF MINNESOTA

COUNTY OF HENNEPIN

Before me, the undersigned authority, on this day personally appeared Deborah A. Schleif, who, being by me duly sworn, upon oath, stated the following facts:

My name is Deborah A. Schleif.

I am over the age on eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

My abortion was performed on June 20, 1972, three days before my 16th birthday at Laurel Grove Hospital in Castro Valley, CA, by Dr. F. R. Van de Carr, Jr. My name at the time was Deborah A. Seger. Attached are copies of 3 surgeries, 2 pathology reports and 2 history and physicals which I obtained from Dr. Van de Carr's office a long time ago. Until now, I didn't know why I felt they were so important for me to keep. It was always a tormenting reminder of what I did to my baby. I can put these records away where I can't see them, but I can't put away the pain that is in my heart.

When I first found out I was pregnant I was really scared. I was only 15 years old. It was a while before I told anyone. I told my mother first. She was upset, but I thought she would be there for me. Next I told my father. He slammed his fist on the table looked at me with such anger and disgust that I thought he could have killed me at that moment. Then he walked out. Later that day my mother told me "your father said that you either have to get an abortion, or leave this house". Then I told Michael, the father of the baby. He wasn't happy about the baby. He wanted me to have an abortion too. I wanted to have and keep the baby. I went to social services and they gave me forms to complete to get child support from Michael and other help from the State. His mother was helping me fill out the papers (she was excited about the baby). When he found out what we were doing, he became very angry and told me if I pursued this, he would get 3 of his friends to testify in court that they also had sex with me and there for I could not prove

who the father was. I don't remember a lot of the details after that, but I do remember that Planned Parenthood was the one who initially gave me the pregnancy test and when I didn't know what to do, when I felt everyone was against me and I was backed into a corner, I saw a counselor there. Shortly after that I had the abortion. I know that I did not want to do this and just before I went into the operating room the doctor asked me if I was sure I wanted "to do this". I said "no, but I have to". I cried.

It was many years later before I was able to tell my sisters or talk about the abortion with anyone else. I still have a hard time. I was never able to conceive after that. I tried for several years with my 1st husband, taking fertility pills and such, but nothing happened. The next step was artificial insemination, but he left me before this was to be done. He left me a note that said, "Debi, I just can't take this anymore. I'm leaving. Good-by." From there, I spiraled downward. It really started before that, but it consumed more of me after he left. I didn't really care about much. I was hurt and I wanted to hurt back. It didn't matter who it was. I hated everyone, especially men. I was drinking more and more and doing a lot of drugs. I couldn't get enough. It helped make the pain go away, if only for a while. Then in 1988, or thereabout, I tried to make the pain go away for good. I attempted suicide. I woke up the next day, in the hospital and in restraints. After I got out 2 days later I was ok for a while, but I went back to the same thing. Trying to get away from it all I moved out of state, but darn if it didn't follow me here. There is no place to hide from your heart.

I am now re-married. My husband has 2 grown daughters from his first marriage and they in turn have 5 children between them. I try hard not to be envious. They are very good to me, but the reality is they are not my children or grandchildren. It is hard for my husband to really understand my pain, but I think he tries. I feel so empty most of the time. When I see a pregnant woman, a newborn or anyone with little children, I think, "It could have been me". I hold every baby I can. Sometimes I have dreams that I am pregnant or giving birth. I can never see the baby in my dreams but I pray that one day, in heaven, I will see my child.

Children, ALL children, are a special treasure from God. If I were to encounter a woman who was considering an abortion, I would tell her what I am telling you now. No matter how strong you think you are, the pain and regret will be stronger and it will not go away. In fact, it will probably change your life in ways you do not want. God is giving you this child, who is growing inside you, because He loves you. If you still aren't sure, I want you to know that you don't have to do this alone. Help is just a word away. Listen to your heart and the one that is beating inside you. You will not be sorry.

As far as the courts go, I don't have much faith in our country's legal system. Judges have favorites, even though they would probably never admit it. It is sad that God is not their favorite. If He were, life would be as precious to them as they are to Him. I honestly hope they come to know God before their time here on earth is over. Even though they make us so angry we want to just shake them and say "wake up and hear the cries of the children who need your help", God still loves them.

I have read the above and foregoing statement and the same is true and correct.

SIGNED this 23rd day of September, 2003.

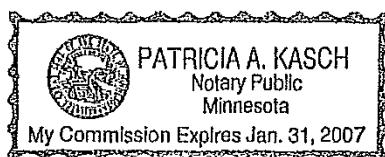
Please use my full name

Katherine Schloef

My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority,

23 day of September, 2003.



Patricia A. Kasch

Notary Public

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Hennepin

My name is Debra Brunsberg. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

08/1974

2. How many weeks pregnant were you?

12

3. What type of abortion was performed?

I don't know. I think they just vacuumed my baby out.

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was told it was just a little clump of cells, very very small and they would basically just remove it.

5. Were you adequately informed of the consequences of abortion?

Yes No

No one ever discussed emotional consequences of abortion. No one asked much of anything.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

society

9. How has abortion affected you?

I was raised Catholic so I knew it was wrong. I bought the lies that it was just tissue, not a baby. I never had children. I had a subsequent abortion because I was terrified due to all the drugs I was doing. I did not feel worthy to have a child. I left the church, religion and God. I smoked pot every day of my life until I was 51 years old. I gained and lost tons of weight. I was so afraid of being sexually attractive, even to my husband. I became aggressive, angry, anxious and started having anxiety attacks. I repressed all that I could and became very vocally pro-choice. It was the only way I could live with myself.

10. How has your abortion affected others in your life?

My parents do not know that I had two abortions. They missed out on grandchildren as did my spouses parents. My marriage ended in divorce after 28 years, the father of both of the children was my husband. He had no belief in God and never wanted to discuss the abortions. I am sure he has repressed it all himself. I have kept a distance from many in my family because this is always in the back of my mind. I have stayed away from people with children because I could not deal with having thoughts of my abortions come back to me. Luckily, the Lord brought me back to the church. I was able to open that door and try to start dealing with the abortions. I never got to grieve! I never got to name my children or even talk about them. The emotional pain is so great all these years later.

11. Based upon your experience, what would you tell a woman considering abortion?

Do not do this. Do not kill your child. Life will not end because you have a child. Give the child up for adoption or find an agency to help you support yourself and the child. Do not do this. You will wake up some day and your soul will be screaming because you will realize that you were lied to. A fetus has a heartbeat at 18 days. It is a living gift from God regardless of how it came to be. Do not kill your baby. Do not become a murderer. You will have to live with that. Please, do not do that.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

You have taken it upon yourself to play God. You have taken it upon yourself to allow the genocide of those who cannot speak for themselves. You have no clue how much damage is done to the woman, the man, anyone who is a part of her life from that moment forward. Legalizing the murder of the unborn has desensitized all of us to all human rights. When someone wants a child and they miscarry after two months, she and all those she know, mourns the loss of her baby. When you purposely kill a two month old, it somehow just turns into a fetus with no rights. If a fetus has a heart beat at 18 days, it is a human being. When a persons selfish motives is all it takes to end a life, we have reached a point of total loss of our humanity and reason. I was 18 years old when I had my abortion. If it had not been legal, I would have two grown children. My life would have been different and I believe so much better. I have to live with that. Thank the Lord there are people out there in my community and my church who are helping me do that. Here, after 34 years, I have finally been able to grieve, acknowledge and name my children. Now I can pray for James Michael and Jon Paul. How can we even say we are one nation under God when we have so effectively removed him from even the act of creation? God have mercy on us.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 5/21/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

If someone you know has had an abortion, encourage them to complete this form.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of Minnesota
County of Ramsey

"My name is Debra Prokop. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? August 1st 1979 Minneapolis MN
- 2) How many weeks pregnant were you? 12 What type of abortion was performed? Suction? I think
- 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: I don't remember any explanation
- 4) Were you adequately informed of the consequences of abortion? No
- 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 6) Did anyone pressure you into having an abortion? Yes No If yes, who? None
- 7) How has abortion affected you? Depression, over eating, loss of self esteem - loss of job - never thought I was worth anything
Had miscarriage 15 yrs after ab - felt loss of empathy towards
no children of my own
- 8) How has your abortion affected others in your life? Never had strong relationships - kept this a secret from prolife parents for 25 yrs
- 9) Based upon your experience, what would you tell a woman considering abortion? I would tell her a story - of regret.
- 10) Based on your own experience, what would you tell a court that believes abortion should be legal? That this kills unborn children - it kill for me + hurts women

You may attach additional pages of testimony, if needed.

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this 21 day of January, 2008

Please use my: Full name First name only Initials only

Signature: Debra Prokop

You may contact me Do not contact me

My signature evidences my authorization
to use this declaration for all purposes

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

This form may be duplicated before completing. Forms can be downloaded from www.operationoutcry.org

Return To: The Justice Foundation · 8122 Datapoint Drive · Suite 812 · San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279) Need Help? 1-866-482-LIFE (5433)

If someone you know has had an abortion, encourage them to complete this form.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN
County of Scott

"My name is Henriah Murphy. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? 2004, midwest Health Center Mpls, MN
- 2) How many weeks pregnant were you? 10 What type of abortion was performed? Suction Aspiration
- 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: However, the nurses were quite vague in their description. It didn't compute in my head until after the procedure was over
- 4) Were you adequately informed of the consequences of abortion? No, they explained the physical consequences but neglected to inform me of the mental & emotional trauma
- 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No it would cause
- 6) Did anyone pressure you into having an abortion? Yes No If yes, who? It compounded the problems I already have. The emotional, spiritual, and physiological repercussions have been horrendous. The sense of loss and pain I felt translated into other areas of my life so much so that when I got mixed up with bad men, I couldn't let them go.
- 7) How has abortion affected you? It compounded the problems I already have. The emotional, spiritual, and physiological repercussions have been horrendous. The sense of loss and pain I felt translated into other areas of my life so much so that when I got mixed up with bad men, I couldn't let them go.
- 8) How has your abortion affected others in your life? My mother feels a sense of loss because her grandchild(ren) has been murdered
- 9) Based upon your experience, what would you tell a woman considering abortion? That she will feel a hole in her heart for the rest of her life that can only be filled with the Blood of Jesus. The consequences of abortion (I would explain the
- 10) Based on your own experience, what would you tell a court that believes abortion should be legal? Will eat her from the inside. I would explain the consequences (emotional, physiological) and spiritually and if they care for the mental health of the population they would ban it. I would also say that no one can complain about foreigners coming here to take our jobs b/c we have people that would never those jobs.

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.
Executed this 20th day of August, 2008.

Please use my: Full name First name only Initials only

Signature: Henriah Murphy
My signature evidences my authorization
to use this declaration for all purposes

You may contact me Do not contact me

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

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Return To: The Justice Foundation, 8122 Datapoint Drive, Suite 812, San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279). Need Help? 1-866-482-LIFE (5433)

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of crow wing

My name is Heidi Magness. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Phoenix AZ

04/15/1984

2. How many weeks pregnant were you?

9

3. What type of abortion was performed?

vacuum

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

They didn't say anything. Just that it would be a little uncomfortable, crampy- during the "procedure".

5. Were you adequately informed of the consequences of abortion?

Yes No

What consequences? I just thought I'd not be pregnant anymore. I didn't ask and they didn't tell.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

My Husband

9. How has abortion affected you?

In so many ways. I became addicted to drugs to mask the pain. Couldn't be faithful to my husband, afterall I listened to him & murdered two of our children. So we ended up divorcing. The children I had living (four) I tried to but had trouble having a real relationship. Never felt like I was good enough, not even adequate. I was on so many street drugs, I thought that was the only way I had to cope. I could never be the "real" Heidi with anyone. In 1987, my husband beat me so bad that I hemorrhaged in my left hemisphere (it was a basal ganglia cell bleed). I wanted to die so I was glad he was trying to help with that. :) I'm currently hemiplegic on my right side. Lotsa health problems!! In 2006 I ended up with up with Stage 3C Breast Cancer. I have very bad trust issues. I don't let many others in. Now, because of the physical (and emotional to some degree) issues in my life- I am more or less home bound, so I don't have a lot of interaction. If it wasn't for Jesus making Himself VERY real to me in Jan. 1994...I know I'd be still in dire straits.

10. How has your abortion affected others in your life?

Lost brotherhood for the brothers. But my youngest child Anthony, wouldn't be here if I had gone through with either pregnancy. So that has affected him positively. That helps me a little. I have just told my ex-husband, he needs to get forgiveness from Jesus and himself, for the murders (abortions), lost fatherhood, and the beating that killed my right side.

11. Based upon your experience, what would you tell a woman considering abortion?

YOU HAVE OTHER CHOICES!!!! The BABY has you...let her or him have a say if she or he wants to be born. You'll regret it maybe right after maybe five years down time, but, I promise you will regret it. Sit here, listen to what I've been through... Let's go to a crisis pregnancy center and see your baby move...

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

If the unborn Babies could agree with it, then I could. But we aren't even asking them if they want to be aborted or not. All kidding aside, Life is a gift that you can't regift. we have to speak for the ones with no voice. What would you or I choose our mother to do when she was pregnant with each of us? I am pretty disabled, but I'm glad that my mom chose life, aren't you?

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 3/15/2010

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

If someone you know has had an abortion, encourage them to complete this form.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN
County of Hennepin

"My name is J R L. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? 30+ yrs ago. Seattle WA
- 2) How many weeks pregnant were you? 8-10 wks What type of abortion was performed? I don't even know.
- 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: I just knew after it it wouldn't be pregnant any more. I had no idea what it really was or what I was really doing.
- 4) Were you adequately informed of the consequences of abortion? NO.
- 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 6) Did anyone pressure you into having an abortion? Yes No If yes, who? _____
- 7) How has abortion affected you? Over the past 30+ yrs, I've cried a lot & felt terrible guilt and shame. I have only told 2 people about it. I've confessed the sin and asked God for forgiveness but I haven't forgiven myself. The guilt & shame eats me up.
- 8) How has your abortion affected others in your life? My husband feels very bad for me (he was not the father). His dad, my sister - I only told her.
- 9) Based upon your experience, what would you tell a woman considering abortion? DON'T because she had a
Under no circumstance do it, life is a gift
from God & too precious. It's the killing of a human being
too.
- 10) Based on your own experience, what would you tell a court that believes abortion should be legal? It is wrong & life
needs to be protected especially in the womb. It destroys
not only the fetus, but the mother.

You may attach additional pages of testimony, if needed.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed this 23rd day of October, 2007.

Please use my: Full name Initials only

Signature: J L

My signature evidences my authorization
to use this declaration for all purposes

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to limit or restrict abortion.

This form may be duplicated before completing. Forms can be downloaded from www.operationoutcry.org
Return To: The Justice Foundation, 8122 Datapoint Drive, Suite 812, San Antonio, TX 78229
Questions? Please call toll-free 1-866-4-OUTCRY (468-8279) Need Help? 1-866-4-82-LIFE (5433)

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Yellow Medicine

My name is Joyce Olson-Baer. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Seattle WA

1/1974

2. How many weeks pregnant were you?

10

3. What type of abortion was performed?

vaginal...not sure what to call it...

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I say no because I'm not sure I fully understood. I wasn't suppose to have my procedure done the day I did...my girlfriend was, but they found that she was to far along so they took me instead and I had not be prepped properly. Before the abortion one was suppose to be NPO,,I had just finished eating a big lunch not even a full hour previsouly.

5. Were you adequately informed of the consequences of abortion?

Yes No

Again, no, because I never dreamt I'd become as ill as I did. It was worst than the flu...Not positive how many days we stayed in Washington before we flew back to Montana, but when we got on the plane I prayed for it to crash so I could die...I ended up in the hospital at home (Wolf Point, MT) shortly after getting home. I couldn't get pregnant for many years after that experience.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

The Clinic Nurses

9. How has abortion affected you?

For several months following the abortion I was physically ill. The mental pain and misery will never totally go away. With the help of Jesus I have been forgiven, but I have not forgotten. I killed my child and I will have to live with that torment forever.

10. How has your abortion affected others in your life?

The people who knew about my abortion always treated me differently afterwards. My boyfriend left me, and several of my best friends turned away from me and still today won't have anything to do with me.

11. Based upon your experience, what would you tell a woman considering abortion?

Not to have one! To have the baby and give it up for adoption instead. Everyone has a right to be born and we are created for a purpose.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

ABSOLUTELY NOT!!!! It is MURDER....

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 5/18/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Anoka

My name is Joy I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Duluth MN

05/13/1995

2. How many weeks pregnant were you?

7

3. What type of abortion was performed?

Suction aspiration

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I received "counseling" but was never told the other side of the story, only basically that abortion was the only choice that would make my life better.

5. Were you adequately informed of the consequences of abortion?

Yes No

There was no talk of a risk of not being able to conceive again, and no one mentioned that I would have mental issues after the abortion.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

The counselor at the clinic.

9. How has abortion affected you?

For many years, I suffered deep mental anguish over the loss of my baby. I relived the abortion procedure over and over and was traumatized by it. I hated myself for killing my baby and worried constantly that I would never be able to have another child. I had flashbacks to the procedure for years afterward. I also suffered much anxiety during my recent pregnancy with my daughter, worrying about losing her because of effects of the abortion. I had a hard pregnancy and was constantly equating it with the procedure I had over 10 years ago, hence causing me more mental anguish.

10. How has your abortion affected others in your life?

The father of my unborn baby suffered mentally over the death of the baby for years after the procedure. My current partner, my husband, also felt much anxiety during my last pregnancy which resulted in the birth of our daughter, due to worry about the effects that the abortion could possibly have on her in the womb.

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell, and have told women considering abortion that it definitely is a bad choice, and that I regret my decision to abort my baby every day of my life. I could not emphasize to women enough that it is not just a simple procedure with no consequences, but that it has the potential to ruin their lives.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Abortion is murder. After my second pregnancy which resulted in the birth of my beautiful daughter, and felt her life within me, I can definitely say that she was a person from the time she was conceived. What I saw on those ultrasounds was a person, not tissue with no rights. Pregnant women do not have the right to kill another person, whether that person is living outside of their womb or within it. During my abortion I physically felt the life of my baby being literally sucked out of me, and if I could have stopped it right then I would have, but I knew it was too late for her. Please don't make it too late for these other beautiful babies.

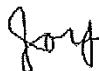
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/16/2008

Please use my First Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of McLeod

My name is Judy Rademacher. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

//1975

2. How many weeks pregnant were you?

12

3. What type of abortion was performed?

D & C

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was told it was not a baby yet

5. Were you adequately informed of the consequences of abortion?

Yes No

They told me it would not hurt. They did not tell me what they would do with the baby.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

It took many years to forgive myself. I also had a mis-carriage

10. How has your abortion affected others in your life?

It was very difficult to tell my husband before we got married that I had had an abortion. I was ashamed, and disgusted with myself.

11. Based upon your experience, what would you tell a woman considering abortion?

Do not do this under ANY circumstances. Even if you have been raped, getting an abortion will make matters worse. You will then have 2 trauma's to deal with.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Listen to the people who have had abortions. 90% plus will tell you they have had problems with depression, alcohol, drugs, suicide, or physical problems. It's just plain ignorant in this age of medical knowledge to think or say that abortion is not only deadly for the child, but also the mother and father.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 8/16/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Olmsted

My name is Julia Bashore. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Des Moines IA

06/03/1987

2. How many weeks pregnant were you?

8

3. What type of abortion was performed?

D&C

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

5. Were you adequately informed of the consequences of abortion?

Yes No

Nothing beyond explaining that there would be a little bleeding.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

boyfriend

9. How has abortion affected you?

I spend 13 yrs hiding it while trying to go on with life. I felt extreme guilt and shame. I felt worried about bonding with my children after marriage. I had terrible nightmares and day terrors. I felt small , inadequate, and very guilty for doing this to my first child.

10. How has your abortion affected others in your life?

My husband suffered greatly because of my choices the first 10 years of our marriage. I treated him terribly because of how I felt about myself. I know my healing helped save our marriage.

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell her that the ramifications of living with that choice for the rest of her life are far worse than

any thing she might experience bringing the child into the world. Living with yourself is very difficult, no matter what your belief system. If you believe it is okay, I really think women who have had abortions must have a hard heart emotionally to live with themselves. It is something they will regret the rest of their lives.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

I would tell the court that our founding fathers believed that human life should be preserved. It isn't right that someone should be charged with murder two times when murdering a pregnant woman, but a woman can legally take the life of her own child, and be okay. Actually she isn't okay, for the rest of her life she must live with this and unless she is healed, goes through a healing process, it will torment her and affect her life forever. For the good of our society, we should not 'help' women by allowing it. Women do not need that kind of help. Help them by letting the baby live by supporting her and loving her through it.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 4/17/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

If someone you know has had an abortion, encourage them to complete this form.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of Minnesota
County of Hennepin

"My name is Julie. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? Gainesville Florida July 1978
- 2) How many weeks pregnant were you? 8 What type of abortion was performed? vacuum suction
- 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: I was not informed that it would end the life of my baby. They told me I was aborting a fetus, a blob of tissue. They Said Doctors don't call it a baby yet.
- 4) Were you adequately informed of the consequences of abortion? NO - They said after the procedure you will be out the door and on with your life again. They said the procedure is safe there will be no harm to our body. See question #7 - I experienced a lot of problems,
- 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 6) Did anyone pressure you into having an abortion? Yes No If yes, who?
- 7) How has abortion affected you? I became anemic and sick with Pelvic Inflammatory Disease that left me sterile. I became bulimic, depressed, angry and full of shame. I suffered from flashbacks, guilt, sadness, self-hatred and isolation.
- 8) How has your abortion affected others in your life? Made my marriage more difficult and my parenting more difficult do to unresolved issues.
- 9) Based upon your experience, what would you tell a woman considering abortion? Don't do it. Abortion causes problems; it doesn't solve any.
- 10) Based on your own experience, what would you tell a court that believes abortion should be legal? Abortion harms women, children and families.

You may attach additional pages of testimony, if needed.

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this 24th day of July, 2008.

Please use my: Full name First name only Initials only

Signature: Julie

You may contact me Do not contact me

My signature evidences my authorization
to use this declaration for all purposes

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

This form may be duplicated before completing. Forms can be downloaded from www.operationoutcry.org

Return To: The Justice Foundation · 8122 Datapoint Drive · Suite 812 · San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279). Need Help? 1-866-482-LIFE (5433)

If someone you know has had an abortion, encourage them to complete this form.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of Minnesota
County of Olmsted

"My name is Karen Choma. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? July 1977, Dallas, Texas
- 2) How many weeks pregnant were you? 8 What type of abortion was performed? suction
- 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: not informed of potential emotional trauma. I was told that the fetus was not alive, it was just tissue. At 73, I believed it.
- 4) Were you adequately informed of the consequences of abortion? No
- 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 6) Did anyone pressure you into having an abortion? Yes No If yes, who?
- 7) How has abortion affected you? The first few months post abortion I abused alcohol significantly. I sought counseling thru numerous areas for poor self esteem + guilt. It was helpful but not significantly. The more profound healing was through a personal touch by God. I have 31 grown children now - but during each pregnancy, I struggled with more guilt + fear of losing these children as "punishment!" (They were all born healthy + are healthy today.) The stigma of being "one who had an abortion" has been problematic in many relationships - including my husband.
- 8) How has your abortion affected others in your life? It has caused my husband to doubt my integrity + character at times - and caused subsequent marital difficulties
- 9) Based upon your experience, what would you tell a woman considering abortion? I would share my story. At the time of my abortion, I didn't believe it was killing when the baby was aborted. I instantly + instinctively knew I had ended a life. I will live with that forever. I would try to discourage her!!!
- 10) Based on your own experience, what would you tell a court that believes abortion should be legal? Abortion is simply "The killing of an unborn child." Our constitution is built on values that say all life - all humans have inalienable rights. If abortion is for a woman to "have rights" we are legalizing the right to be selfish. The question is not whether abortions should be legal - they should be done with unwanted pregnancies - that is still constitutional.

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this 29th day of August, 2008.

Please use my: Full name First name only Initials only

Signature: Karen Choma

My signature evidences my authorization
to use this declaration for all purposes

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

MFL08

This form may be duplicated before completing. Forms can be downloaded from: www.operationoutcry.org

Return To: The Justice Foundation · 8122 Datapoint Drive · Suite 812 · San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279) Need Help? 1-866-482-LIFE (5433)

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of WA.

County of Washington

BEFORE ME, the undersigned authority, on this day personally appeared Kimberly Seebek (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

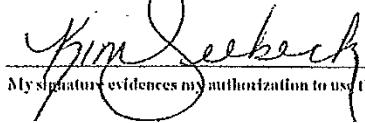
"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: 2000
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? no
- 3) Were you informed of any link between abortion and breast cancer? no Have you had breast cancer? no
- 4) Did anyone pressure you into having an abortion? yes If so, who? planned parenthood
the man who got me pregnant
- 5) How has your abortion affected you? Since the abortion my life has been an emotional roller coaster. I am constantly reminded of the abortion when I think about or see babies. The effects of abortion are very severe and never go away. They may get better but never go away.
- 6) How has your abortion affected others in your life? it saddened them
- 7) Based on your own experiences, what would you tell a woman considering an abortion? think adoption instead at least you are giving the baby a chance and the emotional heartbreak you will have to go through is awful
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? I would say unless you have been through it you have no right to speak. It is up to a woman to decide for her self if she wants to have a baby and what is legal about that

"I have read the above and foregoing statement and the same is true and correct."

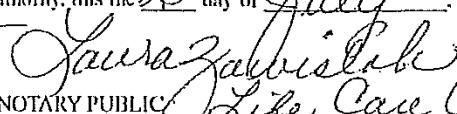
- I want to tell my story.
I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.

My signature evidences my authorization to use this affidavit for all purposes.



BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 25 day of July, 2006

I used to be a notary 
Laura Zabriskie
NOTARY PUBLIC
Life Care Center

You may also answer these questions by telephone with an Operation Opportunity Representative at 1-877-247-7582.

Please access these forms on our website: www.operationnotary.org or make copies of this form and distribute.

Return to Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Hennepin

My name is Kristen Frank. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

St. Paul MN

12/29/2007

2. How many weeks pregnant were you?

9

3. What type of abortion was performed?

surgical

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

Well I didn't realize that the "scraping" and vacuum actually break the being up into pieces before it is sucked out. It's just extremely mutilating, and is not morally correct (I was aware of how part of the procedure was done, but not to the extent of what truly happens).

5. Were you adequately informed of the consequences of abortion?

Yes No

The pamphlet basically states that most women feel a feeling of relief post-procedure, and that the post abortion syndrome is a hoax and that it is all based upon previous mental issues if you do feel depressed, sad, feelings of loss, etc.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

the father

9. How has abortion affected you?

extreme sadness, huge sense of loss, now have a fear of being unable to bear children in the future, inability to forgive myself and has caused me to regret other things that I've done in the past which led up to the abortion. Makes me jealous of other new or pregnant mothers, and have the tendencies to avoid situations where pregnancy is discussed.

10. How has your abortion affected others in your life?

Has made my parents very sad - causing them to grieve as they are very strong pro-life believers. My parents have created a memorial - who knew it would be like this?

11. Based upon your experience, what would you tell a woman considering abortion?

That killing your own child by letting someone else shove a couple of instruments up you to mutilate your baby and then suck it out with a vacuum is not a way to rid yourself of a being that you wished had never arrived in your womb. If you are not willing to give up for adoption (if either abortion vs. keeping the baby - like my situational thoughts), there are so many resources out there through pro-life organizations, churches, etc. Abortion seems to be promoted and appears to be the easy way out, however, the long-term effects are hazardous. I've now seen at least a dozen of women who SEEMED to deal with it ok afterwards, until it ate & ate away at them until finally they realized that they needed to heal from the internal torment, sadness, anger, regret & guilt. The opportunity to have a little child look at you and tell you they love you by far outweighs the long-term psychological effects that could well affect you should you go through with the abortion. All you have to do is ask for help. It will be tough, no doubt about it, especially if you're a single mother, but you will have gained a miracle and left behind undeserved & unwanted feelings of PAIN.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

I would tell them how it has mentally affected me, how different my life has been post-abortion. Life should remain sanctified because from conception the "cells" are ALIVE. Eyes begin to form at 20 days. Many women don't even know they're pregnant until this time & surgical abortions typically aren't even performed until at least week 6 - that's 42 days - brain waves can be recorded at this point. There is a holocaust going on right before our eyes, what has our society come to? We just take the easy way out now? The media portrays sex like it's not a big deal, Planned parenthood is prepared to hand out birth control methods left and right, but honestly...where do you think this is all stemming from? I would probably say the "free to do what feels right" era, as I'm sure you're very well aware. Why is it that sexual abstinence is rarely even taught anymore? Our societal views have changed dramatically and it's spun out of control. If people realized that sex should be appreciated, valued & kept for marriage, we wouldn't even have half the problems that we do now. Abortion is not morally correct and is becoming a killing ground. Our country needs to look at the root of this problem and begin fixing there. These children do not deserve to die - abortion doesn't only hurt the child, it hurts the mother, the father, the grandparents, aunts & uncles. It's very unfortunate and something needs to be done. I am more than willing to do my part.

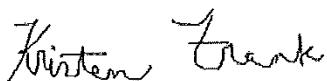
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/5/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of St. Louis

My name is L M I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Duluth MN

//

2. How many weeks pregnant were you?

7

3. What type of abortion was performed?

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

5. Were you adequately informed of the consequences of abortion?

Yes No

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

Until 3 years ago I live in silence and shame and fear of anyone every knowing. I never told or talked about it until I shared with a friend because I knew it was an area in my life that I needed healing from. I hid myself from others and felt like I carried 40 pounds of extra weight with the secret I kept. I feared being exposed all the time and literally a part of me was ripped out. The abortion forever changed who I am.

10. How has your abortion affected others in your life?

I could never really be myself. I felt like I had a huge trust issue with friends and even making friends. I hid part of myself from family because of fear. I was angry and disconnected emotionally from others.

11. Based upon your experience, what would you tell a woman considering abortion?

You may think that you are hiding a secret and that no one will ever find out. The pain, shame, fear that you carry with you for the rest of your life is not worth it. There is no freedom in keeping the secret not to mention the fear of what will happen when you come face to face with the baby someday and God. He sees it all and if it wasn't for His unconditional love, I would not be healed.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

I wish it was never made legal. That's the only reason I had one. I feared my family finding out, so it was a deceitful way for me to hide my mistake. The consequences to taking a life are much worse than facing my family and having a child out of wedlock. Especially now when there seems to be so much grace for single moms.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 7/25/2009

Please use my Initials Only

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION Affected ME

The State of MN

County of Washington

My name is L. W. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

05/18/1990

2. How many weeks pregnant were you?

7

3. What type of abortion was performed?

not sure

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

5. Were you adequately informed of the consequences of abortion?

Yes No

I did not understand the emotional consequences to my choice. I did not understand the increased chances of infertility or higher chance of miscarriage. I could never have imagined the long-term negative side effects that this freedom of "choice" has brought upon my life.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I went through about 10 years of infertility following my abortion, followed by 2 miscarriages. I have been hospitalized 3 times for depression and there is no family history. I have had many years of therapy and support group recovery for this "choice" in trying to heal.

10. How has your abortion affected others in your life?

Yes, it had negative effects on my relationships with family and friends. It negatively affected my ex-husband who was the father of my child and was a definite factor in the demise of our marriage.

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell her that emotional and physical scars that abortion leave are far greater than any other choice available, being raising the child or giving up for adoption.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

NO! The costs of abortion on our society will probably never be fully comprehended but it goes against our humanity. I am a woman who never would have had an abortion if it were illegal. I feel betrayed by my country that something this harmful to me could possibly be that readily available and in so many more damaging forms than it was when I was in that position. I gave birth to a 26 week old preemie that lived and is thriving today because of modern medicine and to know that this same beautiful child could have been killed at my hand is unthinkable. Also to think that it is legal at any given time prior to a child's birth to kill that baby but if the mother chooses to kill that baby even one day after their birth, they can spend their lives in prison is ludicrous. The difference being 24 hours and because the baby was killed by a medical professional that takes an oath to save lives? Please stop this craziness and stop the scarring of women and the killing of innocent children.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 1/26/2009

Please use my Initials Only

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Wright

My name is Laura Anderson. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

St Paul MN

//1980

2. How many weeks pregnant were you?

13

3. What type of abortion was performed?

I don't know

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

there was a quick short speech about what to expect from the procedure. I have received better information when I had a root canal.

5. Were you adequately informed of the consequences of abortion?

Yes No

just a blob of cells flushed away, tomorrow you will forget all of this

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

It has been over 30 yrs, and now I am just starting to come to terms with what I have done. I condemned myself for committing the worse sin I could think of. The relationship with my living children was/is hugely impacted, because I struggle to believe I can be/should be loved. My marriages have been tainted by my internal hatred. My abortion changed who I perceived myself to be, I hated myself for a long, long time. It affected my entire future!

10. How has your abortion affected others in your life?

It pushed my baby father & I apart. 25 years later I finally married my baby's father - but only after 2 failed marriages. We should have never been apart. My mother was devastated when she learned that I murdered her grandchild. We have forgiven each other and are good friends now.

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell them that their life changed forever when they became pregnant, it will never be same again. Now you must choose the new path you want to follow. I would share my experience & offer to answer

any questions they may have & to help them with whatever they decide to do. I would tell them not to have an abortion, and show them sites like operationoutcry.org, where so many women share the sad stories of how their lives were changed. I would also show them pictures of fetus the same age as their unborn child.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

The women already had already made the decision about her own body, that is how she got pregnant. How can killing an innocent child correct a bad decision already made. Life has natural consequences, we need to face them.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 4/4/2012

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Hennepin

My name is Linda Prok. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

03/25/1981

2. How many weeks pregnant were you?

6

3. What type of abortion was performed?

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I only remember being told my child was just a piece of tissue.

5. Were you adequately informed of the consequences of abortion?

Yes No

More than 20 years later, still suffering from the thought that I had taken my own child's life, I entered "Conquerors" a group for post-abortive women. No one ever told me I would carry the guilt for what I had done throughout my life. I was not told that I was have to wait on the abortion table while the doctor made sure that all of the baby's parts had been removed. Now, it was no longer just "tissue" as they had said, the baby had a body.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

Only by the grace of Jesus Christ, have I been able to begin to forgive myself. I still wonder what my child would have become and the joy I missed by not raising this child.

10. How has your abortion affected others in your life?

I haven't been able to tell anyone, still carrying some shame. My husband of 5 years knows - he just loves me.

11. Based upon your experience, what would you tell a woman considering abortion?

Not to do it! There are other options. I wish someone would have stood by me and offered help.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

An unborn child is just that - a child. It should not a 'woman's (or anyone else's) choice' to take that life. A life in the womb has the same value as one out of the womb.

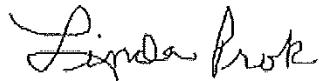
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 7/1/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Pine

My name is Lisa I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

09/24/1994

2. How many weeks pregnant were you?

7

3. What type of abortion was performed?

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

No one explained to me the physical consequences that come along with having an abortion.

5. Were you adequately informed of the consequences of abortion?

Yes No

No one explained the physical, mental and emotional pain / consequences that are so extremely devastating and haunt me til this day.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

Negatively in so many ways. It is a choice that I made with the help of other so called 'health professionals'. I am unable to conceive and my inability to have a family after an abortion causes great pain, grief and guilt every day of my life. I was deceived into believing that abortion would solve my immediate problem and fear of others finding out about my being promiscuous. The truth is that abortion was an easy way out for my lack of better judgement at that moment in my life. The truth is that abortion does take a life away, one that I can only dream of having gotten to know and raise - a child. If a 'fetus' no more than just a fetus - than let it be... what becomes of that fetus - it develops into baby. We have been lied to.

10. How has your abortion affected others in your life?

Greatly, my siblings would love to have loved my child that was aborted, and now they have no opportunity to do so.

11. Based upon your experience, what would you tell a woman considering abortion?

Recommend further investigation into the reasoning why they believe they want an abortion. Every

woman should have the opportunity to have an ultrasound and discuss abortion in the fullest extent before making such a life changing decision.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Abortion is murder. The courts today have given too many women the ability to kill their own child and those women today suffer greatly because of our own choices, but the legal system should be there to protect it's citizens from causing injury or harm to themselves and abortion does neither, it actually causes destruction and is purely evil.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/9/2009

Please use my First Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Scott

My name is Lucinda [REDACTED]. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

04/1977

2. How many weeks pregnant were you?

8

3. What type of abortion was performed?

I don't know. It was at a clinic and they used some kind of vacuum.

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

5. Were you adequately informed of the consequences of abortion?

Yes No

I knew the life growing in me would end, but I did not know the long-term consequences such as depression, dwelling on guilt, etc.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I spent over 10 years of my life on depression medication. The guilt I felt was unbearable and I often cried. I beat myself up for what I had done. I murdered my child. I have been married now for 27 years and have 2 daughters. I just told my grown daughters about this a few weeks ago. I have been ashamed, embarrassed, and devastated by what I have done. After about 10 years of living in extreme self-hatred over this, I found forgiveness in Christ Jesus. Until that time, I seriously considered suicide every day and only kept myself from it by thinking of what it would do to my family. I was no good to anyone until that time. I don't know how anyone stood being around me. Even after I felt forgiven, it was a long process before I healed.

10. How has your abortion affected others in your life?

The only people who know about the still are my husband, my daughters, and a few close friends. I have never told my parents, brother, or sister. I hope telling my daughters the pain this has caused me will keep them from making the same error. When I told my husband, we had been dating a couple years. He almost left me because of it.

11. Based upon your experience, what would you tell a woman considering abortion?

You just can't know what this will do to your self-image and the pain it will cause you and may cause others. I have thought so many times about what my child would have been like and what the world is missing because I took that child out of it before it had a chance to be. Don't murder your child. You will be sorry.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Don't condone murder. It's just so wrong to kill your child no matter what age it is. The child begins on the day of conception and it cannot be said that it is not alive until it is out in the world. Don't decieve yourself. If you keep abortion legal, you will be adding ruin to so many lives. I know I would not have had an abortion if it were not legal.

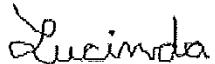
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/17/2008

Please use my First Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

If someone you know has had an abortion, encourage them to complete this form.

**DECLARATION
HOW MY ABORTION WAS PERFORMED**

The State of Minnesota
County of Anoka

"My name is Mary Beth. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? April 1999 Ramsey Hospital / St. Paul / MN.
- 2) How many weeks pregnant were you? 8? What type of abortion was performed? Suction
- 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: _____

- 4) Were you adequately informed of the consequences of abortion? What consequences? My life was terminated or I lost nothing by getting "it" off.
- 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 6) Did anyone pressure you into having an abortion? Yes No If yes, who? the father
- 7) How has abortion affected you? I was very emotional and sad after the abortion. It used days and alcohol, looking to fill a void. But I now know I can only be filled by Christ no matter the sins that I have committed. He will always love and forgive me.

- 8) How has your abortion affected others in your life? I'm not sure, I know my sister wishes I would never do her before I did it.
- 9) Based upon your experience, what would you tell a woman considering abortion? There is nothing that can reverse this decision if you not ready to care for a child. Some one is and they will have their child like there own, choose adoption.
- 10) Based on your own experience, what would you tell a court that believes abortion should be legal? Look at how many lives have been negatively affected by this, you will have God to judge you on your decisions to legalize the slaying of innocent children.

You may attach additional pages of testimony, if needed.

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this 4th day of January, 2008.

Please use my: Full name First name only Initials only

Signature: Mary Beth

My signature evidences my authorization to use this declaration for all purposes.

You may contact me Do not contact me

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of blue earth

My name is mary Norgren. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

st.louis park MN

08/08/1988

2. How many weeks pregnant were you?

12

3. What type of abortion was performed?

suction?

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

5. Were you adequately informed of the consequences of abortion?

Yes No

It was just some tissue but deep down I knew better.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

boyfriend

9. How has abortion affected you?

I believe it has affected my moods. I have been very self-destructive, whenever things are going well I will almost always ruin it.

10. How has your abortion affected others in your life?

I am hard to live with and hard to love.

11. Based upon your experience, what would you tell a woman considering abortion?

Don't.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Sit in a room with a woman ,maybe your wife or daughter when she is crying uncontrollably 20 years after an abortion when she has 4 beautiful children and a wonderful husband and she cannot get past it and truly enjoy what she has now.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 7/15/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

AFFIDAVIT*To be filled out by women who have had an abortion.*The State of MinnesotaCounty of Hennepin

BEFORE ME, the undersigned authority, on this day personally appeared Mary E. Obermiller (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: Meadowbrook Woman's Clinic Mpls, MN Dec 1979
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? Yes

- 3) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No
- 4) Did anyone pressure you into having an abortion? No If so, who?

- 5) How has your abortion affected you? All I can say is -that all of -the affects are deeply negative. Feelings of guilt, shame, regret -that led to overeating, promiscuity, bad relationships and drug use. (Smoking, marijuana, Speed, Alcohol). I felt that if I treated my body bad enough or was treated badly enough by others, -that I could in some way make up for the wrong thing I had done in killing my baby.
- 6) How has your abortion affected others in your life? I told no one else -Only my boyfriend at the time knew it and I told my husband before we got married. My husband has tried to empathize with me.
- 7) Based on your own experiences, what would you tell a woman considering an abortion? I would share my heart with her. Tell her my story. Tell her to get help with the pregnancy & find a group of people going through the same situation. I would tell her what the Bible says and how selfish it is to kill an unborn child as in my case. It can never be worth it.
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? First of all, I would tell them that the blood of all the innocent children affected by their decision, is on their hands. Tell them the facts. Share my story. Share the Word of God about it. Show what has happened in this Nation since abortion became legal.

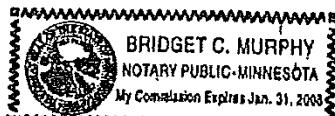
"I have read the above and foregoing statement and the same is true and correct."

Mary E Obermiller

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 11th day of July, 2003



NOTARY PUBLIC

Bridget C. Murphy

*You may take a copy of this affidavit to any Notary Public. Operation of this affidavit is governed by Minn. Stat. 147.22, 147.582.
Please do not fax or e-mail any portion of this affidavit. Any operation of this affidavit is illegal under Minn. Stat. 147.22, 147.582.
Return to Texas Justice Foundation, 8122 Datapointe Suite 812, San Antonio, TX 78239*

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Scott

My name is Michelle _____ I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Robbinsdale MN

08/05/1988

2. How many weeks pregnant were you?

5

3. What type of abortion was performed?

1st trimester

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was told it was a blob of tissue and not a real fetus.

5. Were you adequately informed of the consequences of abortion?

Yes No

I had no idea the pain, guilt and shame that would come years later.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

At first I was in denial. But then I went through the anger and guilt, shame and regret that comes after killing your baby.

10. How has your abortion affected others in your life?

So much so....my kids could have had more siblings, my parents could have had more grandchildren, etc.

11. Based upon your experience, what would you tell a woman considering abortion?

Please don't do it. Take it from me that you will regret it...even if it is not for several years down the road. There are so many other better options available to you!

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

That they have never experienced what you go through once you've made the decision to kill your own child. We need to stand up for the innocent that have no voice of their own. Please consider choosing

LIFE and making abortion illegal.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/7/2009

Please use my First Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

To be filled out by women who have had an abortion:

The State of Minnesota

AFFIDAVIT

JUL 21 2003

County of Anoka/Hennepin

BEFORE ME, the undersigned authority, on this day personally appeared Nancy Kavoski (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true."

1. Tell approximately when and where your abortion occurred: 3-72 New York City
2. Were you adequately informed of the nature and consequences of abortion, what it is, what it does? No. Just told the procedure and that it was only tissue.
3. Were you informed of any link between abortion and breast cancer? No. Have you had breast cancer? No
4. Did anyone pressure you into having an abortion? Yes If so, who? Mother
5. How has your abortion affected you? I feel it has led to the depression I suffer. There is a hole in my heart that will never be filled. Also after-had a horrible infection.
6. How has your abortion affected others in your life? My mother has felt guilt + sadness. Also sadness for my father.
7. Based on your experiences, what would you tell a woman considering an abortion? Please talk to someone at a Pro-life Center etc. I never had that chance. I know I would have chosen not to abort if I had.
8. Based on your own experience, what would you tell a court that believes abortion should be legal? I would tell them it is definitely murder. It is something that a women never gets over. The trauma it causes is irreversible.

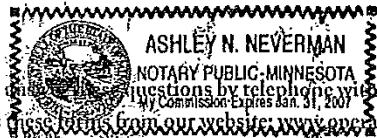
"I have read the above and foregoing statement and the same is true and correct."

- I want to tell my story.
I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.

Nancy Kavoski
My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWEORN TO before me, the undersigned authority, this the 15 day of July, 2003



NOTARY PUBLIC

Caren N. Noy

You may also call 1-877-247-7582 for questions by telephone with an Operation Outcry Representative at 1-877-247-7582.
Please access our website at www.operationoutcry.org or make copies of this form and distribute.

Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT**To be completed by women who have had abortions**

The State of Minnesota
 County of Ramsey

BEFORE ME, the undersigned authority, on this day appeared R. J., who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, that the following facts are true:

- 1) When and where did your abortion occur? Minneapolis in the 1970's, St. Paul in the 1970's
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: I was told I would be pregnant no more than first time, this second time I was told I may not have to wait for two weeks for a miscarriage I was told no consequences
- 3) Were you adequately informed of the consequences of abortion? misconception I was told no consequences
- 4) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 5) Did anyone pressure you into having an abortion? Yes No If yes, who?
- 6) How has abortion affected you? I had guilt and I was sad the first time. I told one person about the abortion and didn't tell my family. It is an awful feeling to have to live with the pressure of隐藏 and continue with my family and today to think of no burial site. I sometimes point now of my children would have been if not aborted. I wrote and picked a name years later. I don't agree with research on fetuses either and feel abortion devalues human life. The father's even when I was married were in the abortion decisions. I avoid talking about it, but listening to the radio stills abortion at taking a life.
- 7) How has your abortion affected others in your life? It is your own self and your own family you would be allowing the Doctor to destroy. If you are like me, it will haunt you even decades later. We as a society, in court, make people get medical treatment and it should start at conception to be consistent. Babies are loved. The people I know who got abortions were single.
- 8) Based upon your experience, what would you tell a woman considering abortion? If you are like me, it will haunt you even decades later. We as a society, in court, make people get medical treatment and it should start at conception to be consistent. Babies are loved. The people I know who got abortions were single.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? We as a society, in court, make people get medical treatment and it should start at conception to be consistent. Babies are loved. The people I know who got abortions were single.

"I have read the above and foregoing statement and the same is true and correct."

Please use my: Full name Initials Only

R. J.

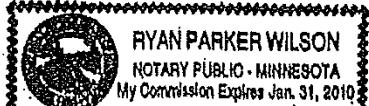
My signature evidences my authorization to use this affidavit for all purposes

May The Justice Foundation contact you? Yes No

Please print clearly ..

To be completed by the Notary:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 4 day of April, 2005



R. Wilson

NOTARY PUBLIC

Please copy and distribute these forms or print from www.operationoutcry.org

Return To: The Justice Foundation · 8122 Datapoint Drive · Suite 812 · San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279) Need Help? 1-866-482-LIFE (5433)

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Scott

My name is S b I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

07/19/1996

2. How many weeks pregnant were you?

8

3. What type of abortion was performed?

suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

5. Were you adequately informed of the consequences of abortion?

Yes No

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

It hurts sometimes when I think about it and then I remember why I did it and what was instore if I didn't do it and the hurt goes away. Do I regret it? Yes sometimes and then again NO I made the right choice!!!!

10. How has your abortion affected others in your life?

My business no one knows!!

11. Based upon your experience, what would you tell a woman considering abortion?

Are you doing it for the right reasons? Is adoption a better choice?

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Abortion should be legal always!!! It's the womens choice and no one elses! But I do think that abortion should be OUTLAWED after the the 12th week of pregnancy unless medical reasons apply!!! There is no reason for abortions to be done on women that are 5 months pregnant!! Really 5 MONTHS!!! 3 months or less you have a choice after that NO CHOICE have it and give it up or keep it PERIOD!!!

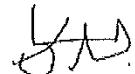
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 4/30/2011

Please use my Initials Only

Signature

A handwritten signature consisting of stylized initials, possibly "JH".

My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Pennington

My name is Shelly Stone. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

06/22/1976

2. How many weeks pregnant were you?

13

3. What type of abortion was performed?

2 day procedure, laminaria with suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I had no idea of the pain, they had me stay in a hotel by myself the night that they put the laminaria in. I still feel that I could have died alone in that hotel room. I had a second abortion while in the Army at the military Hospital at Ft. Gordon Georgia. I would like to report about this also.

5. Were you adequately informed of the consequences of abortion?

Yes No

there was no explanation of either physical or emotional side effects. A social worker came to my room after my second abortion in the hospital. I felt that this was a little too late to ask how I felt.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

I would of had to leave the military otherwise

9. How has abortion affected you?

Physically, I was finally able to get pregnant after years of trying. I believe that the abortion was the cause of this. Emotionally, it was devastating. It has taken me many years to even say the word abortion. I have found healing by talking about my experiences

10. How has your abortion affected others in your life?

I do not believe that I bonded well with my first child. Our relationship is good now but after many years

of healing.

11. Based upon your experience, what would you tell a woman considering abortion?

To go to a crisis pregnancy center. They will help you make positive choices such as adoption or parenting. They will help you through the pregnancy and after. I would tell her that it (the abortion) will stay with her forever.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Had abortion been illegal in 1976, I would not have had an abortion, I am a law abiding citizen and I would not risk my health or breaking the law. My children would be living today and would be contributing members of our society. Millions of children who are missing could be the ones who cured cancer, who could fill the jobs in our country, contribute to social security, and fill the lives and families of our country with hope and joy. Instead, they are all gone. Abortion is not a matter of privacy, but a matter of life. I would ask them to look at the video by National Geographic showing the 3 and 4D images of life in the womb.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 3/6/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MN

County of Wright

My name is Stephanie . I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

St Louis Park MN

07//1994

2. How many weeks pregnant were you?

6

3. What type of abortion was performed?

Suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

It happened so long ago, I have blocked most of the details from memory.

5. Were you adequately informed of the consequences of abortion?

Yes No

I could never have predicted the extreme emotional pain and regret that would continue for so many years.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

Severe regret and shame, emotional scarring and continued emotional pain.

10. How has your abortion affected others in your life?

I now have a husband and two children who will never know their lost brother or sister.

11. Based upon your experience, what would you tell a woman considering abortion?

It seems like an easy out but the effects are life-long. Life is a gift and should not be a "choice".

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

We should not be given the power of choosing life or death. By denying a child life, we are herein declaring human judgement greater than divine judgement and that is a dangerous egotistical error. Abortion is murder.

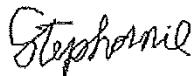
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 5/21/2008

Please use my First Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

AFFIDAVIT*To be filled out by women who have had an abortion*

The State of Minnesota
 County of Hennepin

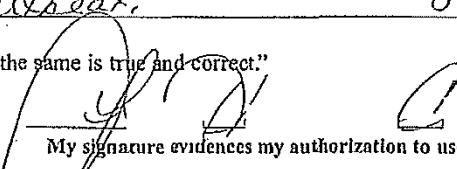
BEFORE ME, the undersigned authority, on this day personally appeared J. H. C. (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: 2/80 Santa Barbara, CA Planned Parenthood
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? I was told of the procedure, but not in detail, not that the fetus would feel pain; not the emotional pain I would carry my ever; not the guilt I would feel If not, explain:
- 3) Were you adequately informed of the consequences of abortion? No
- 4) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? Yes 3/99
- 5) Did anyone pressure you into having an abortion? No If so, who? _____
- 6) How has your abortion affected you? quiet, a part of my life is missing; I regret for that child who I could have become; guilty for not giving it a chance; quiet over losing my other children's brother/sister (away); guilty over ending a life - over murder.
- 7) How has your abortion affected others in your life? yes my children - they are "mine" a sibling - our family is not complete - my ex-husband (baby & taller)
- 8) Based on your own experiences, what would you tell a woman considering abortion? Don't do it!
If you feel like you can't raise the child, give it up
For adoption! There are thousands of families waiting
for children who cannot - don't be selfish
- 9) Based on your own experiences, what would you tell a court that believes abortion should be legal? It is murder,
plan and simple. I do not have the right to decide who
lives and dies. If I had a choice to change what I did,
I would - is a lonely road.

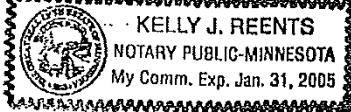
"I have read the above and foregoing statement and the same is true and correct."

Please use my: full name,
initials only.


 My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 4th day of June, 2003.



NOTARY PUBLIC



Please access these forms on our website: www.operationnotary.org or make copies of this form and distribute.
 Return to Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT**To be completed by women who have had abortions**

The State of Minnesota
 County of Clayton

BEFORE ME, the undersigned authority, on this day appeared Valerie Kaye Dunn, who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do, solemnly swear, that the following facts are true:

- 1) When and where did your abortion occur? Women's Clinic Minneapolis, MN
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: Nothing was said about them being babies able to feel, about the horrible pain that followed in my heart, about what this would do spiritually & psychologically to me
- 3) Were you adequately informed of the consequences of abortion? Not at all.

- 4) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 5) Did anyone pressure you into having an abortion? Yes No If yes, who? the father, my friends, fear & rejection
- 6) How has abortion affected you? With each of the 3 abortions I died more inside - I filed the vacuum with anything that might feel good. I was in denial of what I had done for years. I failed a D/C into giving my tubes at age 32 because of reactions to birth control that failed. I had 4 failed marriages, many failed relationships as I killed pain with drugs, alcohol, sex. I became chronically ill with lupus & many other diseases had to stop my career in nursing several times due to my health, had anxiety & depression in treatment centers for mental disorders, suicidal at times, nearly died at age 48 from multiple diseases - found freedom in Christ
- 7) How has your abortion affected others in your life? My daughter wanted siblings - there were none, it separated me from my family once because of secrets
- 8) Based upon your experience, what would you tell a woman considering abortion? that it is a child & a gift right from God not man. how it was conceived that the spiritual & psychological effects are massive - let alone the physical dangers
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? that it is murder & that blood is on the hands of those who legalize it as well as the doctors of this legality

"I have read the above and foregoing statement and the same is true and correct."

Please use my: Full name Initials Only

Valerie Kaye Dunn

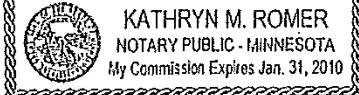
My signature evidences my authorization to use this affidavit for all purposes

May The Justice Foundation contact you? Yes No

Please print clearly.

To be completed by the Notary:

SUBSCRIBED AND SWORN TO before me the undersigned authority, this the 25th day of September, 2006



Kathryn M. Romer
NOTARY PUBLIC

Please copy and distribute these forms or print from www.operationoutcry.org

Return To: The Justice Foundation • 8122 Datapoint Drive • Suite 812 • San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279) Need Help? 1-866-482-LIFE (5433)

AFFIDAVIT*To be filled out by women who have had an abortion.*

The State of MT
 County of Ravalli

BEFORE ME, the undersigned authority, on this day personally appeared Barbara J. Ford (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

- "I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true: in Santa Monica, CA, in Jan 1983 at Back Alley Abortion Clinic
- 1) Tell approximately when and where your abortion occurred. Jan 1983 at Back Alley Abortion Clinic
 - 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? Was an RN working at St. John's Hospital in OB
 - 3) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No
 - 4) Did anyone pressure you into having an abortion? Yes If so, who? My boyfriend who was uninsured
 - 5) How has your abortion affected you? I have had symptoms of PMS. I know God has forgiven me. I was initially shocked and upset. I have been involved with Christian groups and friends and the church since the procedure. I feel better. I have been separated from one of my jobs and received a 100% permanent reduction. I have been trying to help others know about the abortion. My husband actually helped me write a letter to children against abortion. My son doesn't know about it.
 - 6) How has your abortion affected others in your life? My daughter and her family know about the abortion. My husband actually helped me write a letter to children against abortion. My son doesn't know about it.
 - 7) Based on your own experiences, what would you tell a woman considering an abortion? If it is you don't want your life to be changed and never have a day you don't regret your decision. God does forgive but he doesn't let people change.
 - 8) Based on your own experience, what would you tell a court that believes abortion should be legal? It should never be legal. It is murder.

"I have read the above and foregoing statement and the same is true and correct."

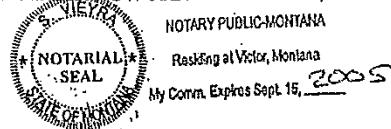
- I want to tell my story.
 I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.

Barbara J. Ford

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWEORN TO before me, the undersigned authority, this the 22 day of January, 2003.



NOTARY PUBLIC

SJ

You may also answer these questions by telephone with an Operation Ovary Representative at 1-877-247-7582.
 Please access these forms on our website: www.operationovary.org or make copies of this form and distribute.
 Return to: Texas Justice Foundation, 8122 Dallamont, Suite 812, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of Montana,

County of Flathead

BEFORE ME, the undersigned authority, on this day personally appeared Debbie Otto (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: August 1975 Lincoln Nebraska
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? NO If not, explain: I went to planned parenthood on a Monday - found out I was pregnant and was scheduled the following day for an abortion - no one talked about it being a baby - my child - no one only described as a quick fix - "no one has to know"
- 3) Were you adequately informed of the consequences of abortion? Absolutely not - it was only described as a quick fix - "no one has to know"
- 4) Were you informed of any link between abortion and breast cancer? NO Have you had breast cancer? NO
- 5) Did anyone pressure you into having an abortion? Yes If so, who? my boyfriend
I'll Never get over it as long as I live - it gave me a very low opinion of myself - I got pregnant again & married that man - it was a disaster - except for my 2 beautiful daughters who are now 20 and 22 years old. I've never quit thinking about my other baby who would be 25 1/2 now. - I've had nightmares about it
- 6) How has your abortion affected you? It cheated my daughters out of a big brother - my parents out of a grandson - it caused my mother grief thinking she was at fault
- 7) How has your abortion affected others in your life? It cheated my daughters out of a big brother - my parents out of a grandson - it caused my mother grief thinking she was at fault
- 8) Based on your own experiences, what would you tell a woman considering an abortion? Don't do it - it will change your life in a way you can't imagine - it's NOT a quick fix - it's the worst thing I've ever done - It's absolutely illegal for a woman to kill her child
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? Abortion not only kills a baby - it hurts women who bear the shame & guilt silently - it touches every aspect of her life exactly like it would to give birth and to kill it then.
I have read the above and foregoing statement and the same is true and correct.

Please use my : Full name.
 Initials only.

Debbie L. Otto

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 20th day of November, 2001.

NOTARY PUBLIC

Darlene K. Clark

*Please access these forms on our website: www.operationoutcry.org or make copies of this form and distribute.
 Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229.*

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of MONTANA

County of LINCOLN COUNTY

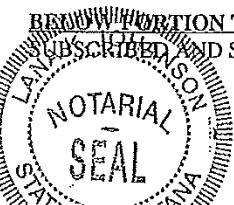
BEFORE ME, the undersigned authority, on this day personally appeared JANA M. LEWIS (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: Spring of 1976
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? No! If not, explain: I was not given information of baby development of the stage I was at (6 weeks). I was not told of how long the procedure would hurt; I was not shown the instrument used, nor what it would do to the baby.
- 3) Were you adequately informed of the consequences of abortion? No! People were fairly kind but wasn't personal; one lady did ask right before the machine was turned on if I wanted to change my mind; no one discussed the psychological consequences.
- 4) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? I have had several breast lumps, surgically removed, no cancer.
- 5) Did anyone pressure you into having an abortion? Not at all. If so, who? My husband brought the subject up & planted the idea in my mind, but did not force me to have the procedure.
- 6) How has your abortion affected you? I have suffered a great loss & experienced huge regrets - my husband has also, though he don't discuss it; I have times of flashbacks & depression, & panic; We have two ~~two~~ beautiful kids & look at them & think what might have been - would that baby have looked like "her" siblings, etc.? Tall, red hair? etc.
- 7) How has your abortion affected others in your life? I am sure my family can sense when I am depressed - only my daughter knows of my abortion - I wish to tell girls not to "buy into" what society says is ok to do.
- 8) Based on your own experiences, what would you tell a woman considering an abortion? Please read and make yourself familiar with the physical, psychological & spiritual effects of abortion; tell her my own personal experience; encourage her to consider adoption; tell her what goes on in an abortion clinic.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? The court must consider that not all laws are just; consider that abortion is murder; consider the high incidence of depression, substance abuse & even suicide among women who have had abortions; consider the baby feels pain during abortion, as well as % of women who have died &/or been injured due to abortion(s).
"I have read the above and foregoing statement and the same is true and correct." been injured due to abortion(s).

Please use my : full name.
 initials only.

Jana M. Lewis 2/18/02
 My signature evidences my authorization to use this affidavit for all purposes.



NOTARY PUBLIC FOR THE STATE OF MONTANA
 RESIDING AT LIBBY, MONTANA
 MY COMMISSION EXPIRES 11-05-2005

NOTARY PUBLIC Raula K. Johnson

Please access these forms on our website www.operationabortion.org or make copies of this form and distribute.
 Return to Texas Justice Foundation, 3122 Broadway, Suite 812, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of MONTANA

County of Missoula

BEFORE ME, the undersigned authority, on this day personally appeared MARYLYN HATCH (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: 1976² MERTON D. Proctor Bellevue, Wa,
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? No If not, explain: AS soon as I arrived I was given what I was told was Valium to relax me for the procedure. Then I was seated for it to take effect. Then called into room to read + sign form.
- 3) Were you adequately informed of the consequences of abortion? No - see above
- 4) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No To this day I will not go to any Dr for Pap or mamo
- 5) Did anyone pressure you into having an abortion? YES If so, who? My husband. Our relationship had been bad for sometime. He had cheated on me many times. (One) time I was with someone else - could have been either mens child.
- 6) How has your abortion affected you? Emotionally, I have been a basket case over it for over 20 years. It is constantly on my mind. The guilt is almost more than I can take sometimes. I was doing drugs and alcohol for many years. Not now I am a Christian - God has forgiven me and is healing me -
- 7) How has your abortion affected others in your life? My present husband - (the other one did eventually leave me for good) my present husband has to continually put up with my sadness, depression, crying - my daughter has
- 8) Based on your own experiences, what would you tell a woman considering an abortion? I work now to do whatever I can to see abortion end. I talk to people all the time. Have given talks, sidewalk counselled, been arrested with operation Rescue type groups. I tell women that is was the worst choice I ever made.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? That it is very very detrimental to a woman's well-being. The regret and especially detrimental to the child that was killed that never had a life - life begins at conception

"I have read the above and foregoing statement and the same is true and correct."

Please use my : full name.
 initials only.

Marylyn Hatch

My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 24 day of July, 2001.

State of Montana
County of Missoula

NOTARY PUBLIC IN THE STATE OF TEXAS
MY COMMISSION EXPIRES 21/11/01
NOTARIAL
SERVICES
Marylyn Hatch

Please access these forms on our website: www.operationoutcry.org or make copies of this form and distribute.
Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

Abortion (Questions For WOMEN Who Have Undergone Abortion)

The State of WA nowCounty of King FlatheadBEFORE ME, the undersigned authority, on this day personally appeared HEGAN PETTY (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: In Seattle, WA near the airport.
on January 30, 1974. It was in an abortion clinic.
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? If not, explain:
I was told by an open door clinic that it was a blob of tissue and the best thing I could do was get an abortion. They said they would make an appt for me and gave me 3 pills that might cause me to start my period.
- 3) Were you adequately informed of the consequences of abortion?
no they said there is no consequences for abortion and that I should do it because of my circumstances.
- 4) Were you informed of any link between abortion and breast cancer? Have you had breast cancer? NO
NO
- 5) Did anyone pressure you into having an abortion? If so, who? my mother took me to the abortionist and paid for it. She told me that I was not going to have this baby or marry my boyfriend kerry Giles my boyfriend wanted me to at first, then asked me to.
- 6) How has your abortion affected you? I became a drug addict and marry him. also was promiscuous. I lost my ovary and both tubes through infection. I have had depression and rage and am now very sad about the whole thing. It's been awful.
- 7) How has your abortion affected others in your life?
I was very angry with my mother, boyfriend, friends, everyone. I hated people and myself and life. I don't care about anything.
- 8) Based on your own experiences, what would you tell a woman thinking of having an abortion?
You probably will regret it and may suffer deeply and wish you had made the other choice to keep your baby, but if will be too late. You'll never forget.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal?
The truth needs to come out. Show people what happens to babies & mothers. stand for the truth. tell the whole truth and nothing but the truth, so help you God.

"I have read the above and foregoing statement and the same is true and correct."

Please use my full name.
 Initials only.

Megan Petty
My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 17 day of Feb, 2001,

Laura Janetski dated Feb. 23, 2001
NOTARY PUBLIC Regarding in Kalispell MT
My commission expires 8/23/02

Please return this form to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

Abortion now
THE STATE OF WA MT
COUNTY OF KING Flathead

Before me, the undersigned authority, on this day personally appeared MEGAN PETTY, (Print Name) who, being by me duly sworn, upon oath, stated the following facts:

My name is MEGAN PETTY (Print Name). My address is 285 Riverside Rd. Kalispell, MT 59901. My telephone number and e-mail address is 406 257 2170 Shekina@digisys.net. I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

I had an abortion Jan 30, 1974. I am now 43 and have suffered deeply, both physically and emotionally for 28 yrs. I have not been able to have children and lost one ovary and both tubes.

I became a drug addict and lost all respect for myself and others. I had a problem with rage and depression and did not want to live. I didn't care what happened to me and took enormous risks. I could not recover from the shame & guilt and was not able to have healthy, committed relationships.

Having an abortion at 16 ruined my life. I lost all hope and had deep seated anger & resentment. I still struggle with feelings of loss and betrayal.

Sincerely, Megan Petty

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

I have read the above and foregoing statement and the same is true and correct.

SIGNED this 17 day of Feb, 2001.

Please use my full name.

initials only.

Megan Petty
My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 23 day
of February, 2001.

Shula Janetski
Notary Public
my commission expires
8/29/02
residing in Kalispell, MT

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of Montana

County of Flathead

BEFORE ME, the undersigned authority, on this day personally appeared Lorraine Bergenthal (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: 1/94 Helena (Planned Parenthood) 5/10 missanda (Blue Nightie)
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? I told my doctor what was a abortion, my baby was just that - a Baby. They didn't tell me anything about Post Abortion Syndrome, Year on Interfert Syndrom
- 3) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No I had it.
- 4) Did anyone pressure you into having an abortion? NO If so, who? The Father of my second
Abortion
- 5) How has your abortion affected you? I became psychologically numbmed after my 1st abortion. I was suicidal to begin with then blocked it out & anding up blocking out all of my emotions. I suffer from Post Abortion syndrome still & it's been healing. I've been through a Bible Study that has helped. I have 2 stemnormal children now nomorally. We had a hard time bonding with my first child because I got pregnant with her only 1 month after my abort.
- 6) How has your abortion affected others in your life? My family I hurt due to my emotional blockage. My bonding with my husband has been different. I haven't been the same since I had the play my baby did.
- 7) Based on your own experiences, what would you tell a woman considering an abortion? It's not ok! It would tell her all that happened to me & how you care about her for your child. Post Abortion syndrome is no different than Post Partum Stress. Have that baby, love your baby!
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? It's not up to us to decide who is able to have life. It's up to God & it is unconstitutional. Let every person have the right to life. So do all these babies that have been murdered.

"I have read the above and foregoing statement and the same is true and correct."

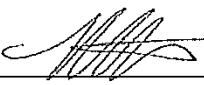
I want to tell my story.

I understand that someone will contact me.

Do not contact me.

You may use my full name.

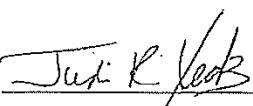
Please use only my initials.


My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 14 day of April, 2003

NOTARY PUBLIC



You may also answer these questions by telephone with an Operation Outcry Representative at 1-877-247-7582.

Please access these forms on our website: www.operationoutcry.org or make copies of this form and distribute.

Return to: Texas Justice Foundation, 812 S. Datapoint, Suite 812, San Antonio, TX 78229

The State of Montana
County of Cascade

BEFORE ME, the undersigned authority, on this day personally appeared, Sheila Konkol, who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

1) Tell approximately when and where your abortion occurred:

Unfortunately and tragically, I have had not 1, but 2, abortions. These were many years ago, but approximately in 1973 and again in 1978. Both occurred in Great Falls, Montana.

2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does?

No, with both abortions, the physicians shared absolutely nothing with me regarding the nature and consequence of abortion, except that I was terminating a fetus. I did not see the end result of either abortion.

3) Were you informed of any link between abortion and breast cancer? Have you had breast cancer?

No, I was not informed. No, I have not had breast cancer.

4) Did anyone pressure you into having an abortion? If so, who?

Yes and no. With my first abortion, I was a young 18 year old girl, and my boyfriend was 17 years old and still in high school. He was terribly afraid of his father finding out, and the consequences thereof. I told my mother, and she physically fainted on me, and clamed up. All she said is "how could you do this to me?". I felt very alone. I was naive and caulkly, and took matters into my own hands. I choose the abortion route, because I had no guidance, and I also wanted to protect my boyfriend from his father. I never really stopped and thought about what I was doing, I just did it. And only after it was done, did my mother talk to me, no she did not approve of the abortion, but she was not there for me either, before I made the decision to terminate my pregnancy. I later married this young man, and we had one son, who is now 28 years old. However this marriage lasted only a year and a half.

With my 2nd abortion, I was a few years older, a single mother by then, and held a good position with the federal government. I did not date for quite awhile, and then I met a man, who accepted both me and my son. We spent a lot of time doing things together that could include my son, and I came to care deeply for this man. However, I still belonged to the world, and fell into pre-marital sex, though I was on birth control, I conceived. Prior to knowing I was pregnant, the symptoms of the pregnancy were not normal. I was having severe back pains, and no one tested me for pregnancy because I was on birth control pills. I ended up being put on a medication that ultimately could cause bone deformities if taken in the earlier weeks of pregnancy, which is exactly what I had done, again not knowing I had conceived. Ultimately it was determined I was pregnant, and the physician recommended highly, that I terminate the pregnancy, because of the possible consequences to the baby. I wanted this baby very much, but was afraid of having a deformed child, not for my sake, but for the child's. I also quite frankly, did not want to be found out by my co-workers and others, find out that I was pregnant and not married. So I hid behind the advice the physician had given me, and took the easy way out again, and terminated the pregnancy, thinking I could tell God I was sorry and go on with life. What a terrible mistake and lie to myself. Here again, I married this man approximately 6 months after the termination, but I did not go on to have another child for twelve years after the marriage.

5) How has your abortion affected you?

I am still married to this man today, and have two sons, one is 28 years old, and the other is 10 years old. I am also the grandmother of a 6 year old and 6 month old. I am 49 years old and a strong and committed Christian today. I love Jesus so much, and it pains me so, that I committed these grievous acts in my youth. It has been with great remorse and many tears to Jesus that forgiveness has come to me. Forgiven, yes, forgotten, no! Every now and then, I look at one of my dearly loved sons, and think silently to myself, "I killed your brother or sister, I don't even know if they were a girl or boy, and I think, I'll bet they looked just like you, and definitely just as precious as you are to me". It is then I have to stop and tell Jesus again, how very sorry I am, and to please tell my little ones, that I am so sorry, and love them so, and will see them in heaven one day. And then you go on about your daily life, because you must, but silently wish you were not one of the millions of women guilty of taking the life of their unborn children. Wishing you had never heard of legalized abortion. Wishing you would have gone forward with the pregnancy, and had four precious children today, instead of two.

Today I have the backbone to stand against the world, back then, I was young, and caught up in the lies of the world and youth. Every time I hear of abortion, or see a picture of an aborted baby, my heart aches so, because no matter what, no matter that I am forgiven, the fact is, I had 2 abortions, killed 2 of my children, and then just as easily, gave life to 2 children. A mother is suppose to protect her children, not kill them. Motherhood is such a beautiful gift God has given us, women. We as women, as human beings created by God, should not have the power to decide life and death, and had legalized abortion not been around, I know without a shadow of a doubt, that I would not have sought an illegal abortion no matter the circumstances, and today would not be a woman and mom, that is post-abortion, and suffered the agony thereof.

Today, I promised Jesus, I would be one voice, among many voices, to stand against abortion, by sharing with you, that I fell prey to this awful lie and have suffered the consequences thereof. I choose to be part of "the salt and light" that Jesus can use, to save life and help other women and young girls avoid the haunting memory of knowing what one did, and believe me, that haunting will come sooner or later! So by filling out this affidavit, and having it notarized this day, the 30th anniversary of legalized murder, is my way of being a voice for the voiceless, as unto Jesus.

6) How has your abortion affected others in your life?

I divorced from my first husband and don't know how it has affected him. My present husband, with whom I had my 2nd abortion, is against abortion. When the time is right, I will share with my two sons, my story, and the stance I have taken today, for Jesus and life.

7) Based on your own experiences, what would you tell a woman considering an abortion?

I would share with her the tragic memories she will endure, once she comes to realize what she has done. I would share with her the beautiful gift of a child, the blessing of being a mother, or if one opted to put a child up for adoption, knowing that you did the right thing, that you chose life, not death, for your unborn child. And yes, that "being" inside of you is a baby, God created, and don't fall prey to the deception of the world and pro-abortionists, that it is not life. Live with knowing you gave life, did not destroy it. Don't live knowing you actually legally murdered your child. Know that Jesus loves you and the baby, and there are positive and good options available to you and the baby, if you give life to the child. I would share my story with her in hopes she would choose life. I would love her and share Jesus and his love for her, with her.

8) Based on your own experience, what would you tell a court that believes abortion should be legal?

That abortion should not be legal for several reasons. First and foremost, abortion is wrong, because God, our creator and judge says it is wrong. Conception is new life, created by God our Father. Second, because so many women have abortions when they are young, scared, naïve, and belong to the world at that time, they have not had the chance to experience the beauty of birthing and raising children, of being a "mother". Or, should they be a mother, as I was, and still take the life of another unborn child, they cannot possibly know the haunting memory of knowing that you took the life of a child. The condemnation ones feels when seeing pictures of aborted children or hearing stories of abortion and knowing that you yourself partook in one.

There is no turning back once the procedure is performed, it is a done deal, though you may not experience the tragic aftermath for years, and they will experience and know it. No, the world's courts do not convict you, your conscience convicts you, and from that you cannot flee. Don't give them a chance to legally abort and experience self-condemnation for such a grievous act of taking the life of their unborn child. Instead educate young people, in morals, respect for themselves, respect for life, respect for God's law, and the positive consequences thereof, not the agony of the past actions, that cannot be undone.

Again, I say, that had legal abortion not been available to me, in either circumstance of my unwanted pregnancies, I would have never sought out an illegal abortion. I would have gone forward with my pregnancy. I would never have suffered the consequential and psychological aftereffects of abortion. The courts don't experience these aftereffects, the "mom" does. Don't give her the chance to destroy herself emotionally or physically, instead give her the dignity and the only choice, right to life.

"I have read the above and foregoing statement and the same is true and correct."

Signature: Shirley F. Karpal

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 22 day of
Jan, 2003.
NOTARY PUBLIC

Todd Kelley
Todd Kelley

NOTARY PUBLIC for the State of Montana
Residing at Great Falls, Montana
My Commission Expires March 23, 2005

Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

Please check the applicable boxes:

- I want to tell my story. *Should you need me I will need to tell my son's first.*
- I understand that someone will contact me.
- Do not contact me.
- You may use my full name.
- Please use only my initials.

To be filled out by women who have had an abortion:

The State of Montana
County of Powell

AFFIDAVIT

BEFORE ME, the undersigned authority, on this day personally appeared Susan N Gliko (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit; I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true."

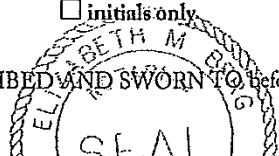
1. Tell when and where your abortion occurred: My abortion occurred October 21, 1989 at the Blue Mountain Clinic in Missoula Montana.
2. Were you adequately informed of the nature of abortion, what it is, what it does? If not, explain: I did know it would terminate my pregnancy but I was not aware of my child's development or the procedure that would be used to suck my child piece by piece from me.
3. Were you adequately informed of the consequences of abortion? yes, I had to read and sign a surgical consent form that listed pretty much all the physical damages including possible death. No emotional or spiritual counseling.
4. Were you informed of any link between abortion and breast cancer? NO
Have you had breast cancer? NO
5. Did anyone pressure you into having an abortion? I was a poor divorced mother of two working very hard to prove my value. I was afraid to face all the negatives like She had another baby to lower her rent. If so, who? Society and fear of causing my mother's health to further decline,
6. How has your abortion affected you? I am empty. I try to numb my pain with alcohol and food. I have panic attacks in crowds. I don't trust myself with important decisions. I suffer tremendous grief on the anniversary of my abortion.
7. How has your abortion affected others in your life? I over compensate with my kids so they don't make my mistake. My husband has a broken woman who won't let herself be fully loved. To others especially men, I am very distant. I am very hard to get to know.
8. Based on your experiences, what would you tell a woman considering an abortion? Slow down and be calm. Don't rush! This fear and panic will pass and lead to the joy of a child. To act on the panic doesn't make the child not real. A mother never forgets the fruit of her womb. Her child will forever haunt her.
9. Based on your own experience, what would you tell a court that believes abortion should be legal? Women in desperate situations need to be protected from making acts of desperation. Acts that don't improve their lives. Acts that hurt them irreversibly. It is not natural for a mother to kill her child.

"I have read the above and foregoing statement and the same is true and correct."

Please use my: full name.
 initials only.

Susan N Gliko
My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 23rd day of April, 2002.



Susan M. Bein

Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT*To be filled out by women who have had an abortion.*The State of MontanaCounty of MissoulaBEFORE ME, the undersigned authority, on this day personally appeared Susan Kay Hensen (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: Helena, Montana - private doctors office
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? No If not, explain: It was illegal at the time - I paid cash and a doctor who was a surgeon did the abortion in his office. I don't remember the doctors name.
- 3) Were you adequately informed of the consequences of abortion? No

- 4) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No
- 5) Did anyone pressure you into having an abortion? No If so, who? I felt guilty of killing my own child. the guilt ultimately turned me to Jesus and His forgiveness.

- 6) How has your abortion affected you? I have read the above and foregoing statement and the same is true and correct.
- 7) How has your abortion affected others in your life?

- 8) Based on your own experiences, what would you tell a woman considering an abortion? Don't kill your babies. It's the right decision to have your baby. So many people are waiting to adopt if you do not want to keep your child. I will encourage you as you make your decision.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? I do believe our country will be judged for killing so many innocent lives. I wish I had made a better choice when I was pregnant. I often wonder about my baby... a boy with red hair and 28 years old.

Please use my : full name.
 initials only.

Susan Kay Hensen
 My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 29 day of January, 2002.



Karen Green
 NOTARY PUBLIC Ex date 2-14-2002

Please access these forms on our website: www.operationnotary.org or make copies of this form and distribute.
 Return to Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

DECLARATION HOW MY ABORTION Affected ME

The State of MT

County of Flathead

My name is Dawn I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Las Vegas NV

//1991

2. How many weeks pregnant were you?

8

3. What type of abortion was performed?

D & C

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

All terminology used during counseling was generic such as how many weeks fetal, fetal tissue, etc. The word baby and child were never used. There was no talk of long lasting emotional effects and there was no talk of other alternatives.

5. Were you adequately informed of the consequences of abortion?

Yes No

I was not informed of health or emotional consequences. The procedure was explained as routine and no concerns or advisories were expressed.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I still don't remember for sure the month it happened. I tried to suppress it for so long out of regret that I struggle to remember the year. I carry around a burden so great that I wouldn't wish it on anyone. I know God has forgiven me, but I struggle to forgive myself. I have children now and fear that if they ever found out what I did, they would wrestle with the reality that I could have killed them, too. The emotional turmoil, guilt, feelings of worthlessness and isolation have been suppressing me ever since having the abortion. I had no idea I would endure such long lasting effects. I suffered less when I had a tubal pregnancy rupture and almost died.

10. How has your abortion affected others in your life?

It's affected everyone I encounter without their knowledge because I'm not fully myself anymore. A part of me died that day by my own doing. How can that not affect others?

11. Based upon your experience, what would you tell a woman considering abortion?

Don't do it under any circumstances! There are so many other options that you can live with instead of the lie of abortion that destroys and haunts.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

By allowing a woman to have an abortion, in essence, she is killing part of herself, too. Think of how many people are shells of their former selves because of this practice. Think of all the babies punished for no reason. Nothing good comes from legalized abortion.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 10/12/2008

Please use my First Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION Affected ME

The State of MT

County of Flathead

My name is Joni Lineberry. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Iowa City IA

09/10/1975

2. How many weeks pregnant were you?

10

3. What type of abortion was performed?

Saline injection

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was informed that I needed to be sure of my decision..I was not informed of the horror and the pain my baby would feel because of the saline injection -- the burns my baby would experience...I was not told that I was carrying a baby... with hands and feet and organs.... I was not informed that the consequences of my abortion would continue for decades...that I would fall to the lowest depths of despair and sorrow.

5. Were you adequately informed of the consequences of abortion?

Yes No

I was a stupid child and just wanted to not be pregnant, and I thought if the pregnancy was ended, my problems would end. As impossible as it sounds, I never really thought about the emotional consequences...I thought if it was legal it must be okay...I thought I could never tell my parents...the negative effects began immediately after my abortion and went on for many, many years...I still cry...I went thru extreme alcohol and some drug use and much pain.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

Abortion has affected my whole life...for 25 years I walked in shame and felt I could never be forgiven by God...I could never forgive myself. My whole vision of God was skewed by my abortion. I have been forgiven and do have an awesome relationship with Jesus, but I will never not cry about my abortion...I murdered my child for convenience and as I matured and realized how precious life is and how precious each of my children are...well, it is a heavy weight to bear. I have met so many women who have not come to terms with their abortions...I have been blessed with three awesome and healthy children, but

I will always regret my decision to terminate the life of my child. How many times have I wished that I had been braver and have this child in my life, but that will not happen on this earth. My abortion has given me a desire to help other women understand how big God is and how forgiving He is and how precious life is.

10. How has your abortion affected others in your life?

My friends and family know of my abortion and how devastating it has been to me...I think it has helped them to be pro-life and sympathetic to young women in the position I was in. My kids know they have a sibling that they will meet someday in heaven.

11. Based upon your experience, what would you tell a woman considering abortion?

I would explain to her that she is a precious child of God and she carries a precious life in her womb and that abortion is not a good choice...that this abortion will not solve her problems, but will bring a host of other problems and issues, heartbreak...I would tell her how special she is and we would pray together... I would pray she could be brave and promise her that the life inside of her, if she will let it grow, will be a blessing to her beyond what she can imagine..that she can choose to keep her child and be blessed or bless another family wanting a child and be blessed in another special way. I would explain to her the years of sorrow that she would experience in regret and pain.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Life is a gift and the right of each person whether born or unborn and that right should be protected....Life begins at conception and any nation who chooses to endorse the killing of the unborn is a nation violating this right...and a nation violating the God on whom our nation has been established. Abortion hurts women long after it occurs and the negative affects are so far-reaching that it is wrong for a court to allow a woman to be hurt in this way when she cannot understand fully the consequences of her decision...no one can understand the consequences of this except a woman who has been thru this herself. NO ONE.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 1/3/2010

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MT

County of Carter

My name is Laura Middleton. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Ft. Collins CO

01/29/1980

2. How many weeks pregnant were you?

7

3. What type of abortion was performed?

D & C, I believe

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

The only thing that was explained to me was the procedure of inserting something into my uterus, going home for the night and going back for the D & C type procedure.

5. Were you adequately informed of the consequences of abortion?

Yes No

Nothing was said to me about any consequences....not physical nor mental.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

Female friend that knew I wanted to retrain to LE

9. How has abortion affected you?

It didn't seem to affect me for quite a few years. However, with counselling, I have come to realize that my "cold-heart feelings" toward others, promiscuity, deep depression, anger towards men and my friend was caused by my abortion.

10. How has your abortion affected others in your life?

While my son, who is the only boy I ever had, has forgiven me....he wonders about the brother he never got meet. My daughter wonders at my selfishness of depriving her of another brother. She also felt my cold-heartedness towards family and friends and resented me for many years. :(Only in the last year or so has she opened up more to me.

11. Based upon your experience, what would you tell a woman considering abortion?

NOT to have an abortion! While my friend says she has never regretted having her abortion, I know from personal experience that it is morally wrong and can affect one's life, in many negative ways. I was a

bitter, angry, mistrusting, depressed person for many years. Raising a daughter, I gave her reasons not to have sex before marriage. Finding out that she was already having sex with older men, I told her that if she became pregnant, there was NOT going to be an abortion, but the baby would be placed up for adoption, like my first child. Fortunately, it never became an issue. I would tell women that there are many wonderful people wanting to give a baby a good home. Plus, placing a child up for adoption doesn't have the negative consequences that abortion does.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Abortion should NOT be legal in any way, shape or form! Planned Parenthood and other abortion-rights groups have done no indepth studies to see the effect of abortion. In fact, they deny that there are any problems. With the internet, it is easy to find MANY websites to help women with post-abortion problems (mental and physical). Each of these websites have thousands of women who are crying out for help with the trauma that abortion has brought into their lives. It will take several generations to undo what Roe v Wade wrought on the American people and it starts with the SCOTUS.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 7/19/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION Affected ME

The State of MT

County of Lewis and Clark

My name is Linda Hoenigsberg. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Inglewood CA

//1970

2. How many weeks pregnant were you?

10

3. What type of abortion was performed?

D&C

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I knew I wanted an abortion and the doctor agreed as long as I said I was suicidal, but he did not explain anything to me about the procedure.

5. Were you adequately informed of the consequences of abortion?

Yes No

There was no explanation of anything. As a matter of fact, I got an infection when he left a piece of the baby inside. The pain was so horrific I could not walk. He did not warn me of this and seemed surprised it happened.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

It has now been almost 40 years since the abortion. The older I get, the more I regret the abortion. I wonder about the baby...if it was a boy or girl, who he or she would have been. I feel I sinned against God. It has been hard to forgive myself.

10. How has your abortion affected others in your life?

There is a man out there who would have been a father and I never told him I was pregnant.

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell her to get all the information she can first. She needs to be able to see her baby via ultrasound. She needs to know all the consequences, including medical and emotional and psychological, before she makes a decision.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

That they need to decide that after reviewing all the evidence to the contrary.

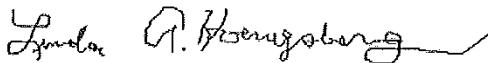
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/7/2009

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

If someone you know has had an abortion, encourage them to complete this form.

DECLARATION HOW MY ABORTION HURT ME

The State of Montana
County of Cascade.

"My name is Lisa. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? 1985 and 1986 Atlanta, Georgia
 - 2) How many weeks pregnant were you? Maybe 10, and 11 What type of abortion was performed? thru suction
 - 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: I was told that it wouldn't feel anything. I didn't know then what a fetus or embryo was, but I was told that I shouldn't wait and that I should have the abortion before 12 wks. I was led to believe that it hadn't formed into a baby yet.
 - 4) Were you adequately informed of the consequences of abortion? I was never told it could cause cancer or prevent me from having children later, or of the emotional effects. I was told it could cause my death (most cases) and/or complications
 - 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
 - 6) Did anyone pressure you into having an abortion? Yes No If yes, who? the 1st time no. The second time yes, my boss, baby's father, others
 - 7) How has abortion affected you? I thought it would be an avenue for me to make a fresh start, go to college, have a successful life. I tried to forget it and cover it up with relationships, drinking and other unhealthy things. Just made it worse. I couldn't stay focused in college and quit before the end of my first year. Got pregnant again and because of using unhealthy substance, I was scared the baby would be deformed or I was persuaded to have another abortion. It was easier the second time because I had already been convinced that as long as I did it before 12 weeks, it was safer and the fetus had developed. I felt emptier afterwards, angry at everyone. I hated myself and at times had suicidal tendencies. I've been deceived, and robbed of children that should have been part of my family. My family's been robbed of family.
 - 8) How has your abortion affected others in your life? It stole my mom's grandchildren and my children's siblings, and caused them to struggle with fear of possible refection because I rejected their siblings
 - 9) Based upon your experience, what would you tell a woman considering abortion? It's a decision that will affect her for the rest of her life. I would say, "make sure you have all the facts about pregnancy and abortion, consider the outcomes of all of them. Terminating a pregnancy is in no ways an easy act, and the abortion does not assure future life success"
 - 10) Based on your own experience, what would you tell a court that believes abortion should be legal? Abortion says that we have the right to do what we want to with our body, even at the expense of another's body (the baby inside). How is that different from a rapist exercising their right to do whatever they want to with their body at the expense of their victim?
- You may attach additional pages of testimony, if needed.*

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this 11th day of October, 2010.

Please use my: Full name First name only Initials only

You may contact me. Do not contact me

Signature: 

My signature evidences my authorization to use this declaration for all purposes

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

This form may be duplicated before completing. Forms can be downloaded from www.operationoutcry.org

Return To: The Justice Foundation - 8122 Datapoint Drive, Suite 812 - San Antonio, TX 78229

Questions? Please call toll-free 1-866-4 OUTCRY (468-8279). Need Help? 1-866-482-LIFE (5433)

victim's body? or a person who drinks and drives and kills an innocent kid in the road who just happened to be in the way of one who did what they wanted to with their body? Maybe their intent wasn't to kill, but only do what they felt they needed to for themselves at the time.

How does abortion differ from either of these that we label as crimes? If you legalize the taking of another's life (murder thru abortion - a heinous crime) which devalues human life in the name of comfort and convenience, it sends a message to murderers, rapists and other violent offenders either directly or indirectly that the value of human life is limited to the circumstances surrounding it. Legalizing abortion says that the value of human life is limited to whether or not that life benefits the one taking it. It also sends the message that human life and its value is subject to popular opinion (a vote). If you're a politician, this may appear to be a harmless and acceptable democratic way of approaching an issue, until it hits home and you find yourself suffering from a law you endorsed. This is about more than another issue. It's about lives. It is our moral duty to fight to promote and to preserve life. What about the preamble which begins, "We the people of the United States..."? We all were people in our parents' womb. Did we not exist? Were we not human until we got a birth certificate or social security card? I have a niece who was born at 4½ months, one at 5 and one at 6 months. They are healthy citizens of our nation, and so they were in their mothers' womb, healthy, living, growing. You can reason this down to a matter of conscience, and even consider it a luxury, but to eliminate conscience is to invite chaos, and without conscience, that's all we've made space for.

When we override conscience to make legal things that should not be so, it belittles the value of conscience concerning that thing made legal in our society and only contributes to the breaking down of the moral fiber of our country.

The message that all people are receiving isn't, "Even though this is legal, potentially harmful, even fatal consequences are likely to follow," or "legal, but lethal. What the public hears is, "It's legal so I can do it."

When a law is passed, those who've opposed have often considered consequences of making such legal. Those in favor of it often see little or no consequences. Consequences follow choice. That much is proven. And in the case of life

resulting in death, the most tragic consequences cannot just be undone. Our laws will not raise the dead who's blood is on our hands, restore broken lives and homes or reverse the holocaust that resulted because it was left to a vote. Adolf Hitler made laws, and those who made up the majority in his eyes thought he was right and supported his decisions. The holocaust was legal, law under Hitler's reign. It's loath remembering when you justify legalizing abortion that an estimated 11 million people, 6 million of which were jews, whose lives were of no value or significance to that society, did not get to vote. Hows that for democracy? I can't help but wonder how differently things would have turned out had their voice been counted.

AFFIDAVIT

The State of MONTANA
 County of FLATHEAD

JUL 28 2003

BEFORE ME, the undersigned authority, on this day personally appeared M. CHRISTIE BOND (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: El Paso, TX 4/86
 - 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? Probably not. I counseled with an "objective" organization which encouraged me to do what I thought best, but also advised against visiting a pro-life clinic.
 - 3) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No
 - 4) Did anyone pressure you into having an abortion? Yes If so, who? The father of the child.

 - 5) How has your abortion affected you? I regretted allowing myself to be coerced. I am ashamed and asked the Lord to forgive me. I think of that child, imagine a girl named Amanda and wonder what she would be like. I think in my mind I decided to try never to get pregnant again (which I have not) because of what I did. My desire to adopt children who needed a home, which God has allowed (2 children).
 - 6) How has your abortion affected others in your life? I'm sure it has affected my husband and my friends who knew what I did.
 - 7) Based on your own experiences, what would you tell a woman considering an abortion? Check out fetal development, go to a crisis pregnancy center, ask the Lord for help, check out adoption, etc.
 - 8) Based on your own experience, what would you tell a court that believes abortion should be legal? We do have a choice; A choice to be sexually active, a choice to use birth control, a choice in our behavior. Once we are pregnant we have an obligation before God and man to be responsible for our actions, get prenatal care do our best to birth a healthy child and put him/her in a loving home be it ours or an adoptive one. I have read the above and foregoing statement and the same is true and correct." Also medical information would be willing
- I want to tell my story.
 I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.
- (over)

M. Christie Donaldson Bond

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 26 day of July, 2003

RHONDA J. PETERSON
 Notary Public for the State of Montana
 Residing at Bigfork, Montana
 My Commission Expires Oct. 22, 2005

NOTARY PUBLIC

Rhonda J. Peterson

should be given to the courts from experts. It seems to me, as I understand, there is evidence showing not only physical development from fertilization, but also psychological development of the fetus. (see Ghosts from the Nursery by Robin Karr-Morse and Meredith S. Wiley). Isn't that grounds that a fetus is a human, though unborn, with all the rights of a human?

DECLARATION HOW MY ABORTION AFFECTED ME

The State of MT

County of Cascade

My name is N. K. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Great Falls MT

02/1972

2. How many weeks pregnant were you?

11

3. What type of abortion was performed?

Don't know -- official name was TIP

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

No counseling was included.

5. Were you adequately informed of the consequences of abortion?

Yes No

No counseling was included.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

Father of the child -- by boyfriend

9. How has abortion affected you?

Back then abortion was a social stigma so I never talked about it. I was unable to continue the relationship with my boyfriend -- could not even look at him. I denied I had even pregnant. I was not able to have children after the abortion and always blamed my infertility on this. I became self-loathing. But I hid everything very well. It wasn't until I became a Christian and realized the freedom of forgiveness that I began to overcome the emotional trauma of the abortion.

10. How has your abortion affected others in your life?

I was not able to be intimate with any man. Part of my hatred of men was linked to the abortion. I was distant and cold-hearted.

11. Based upon your experience, what would you tell a woman considering abortion?

There are so many other choices available. Look at the pictures of aborted children and know the life inside you is human from conception. Denial only works so long and then the realization of what you do will haunt you. Physical as well as emotional problems will plague you. Please, consider other options. Help is available. Choice life!

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Our culture has convinced the majority of people that abortion is an option, but it is always a selfish choice. Abortion kills an innocent child; like it or not, that is a real truth. Protect the rights of the unborn. Options are available to the mother that will ensure her unborn child has a chance to live.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/17/2008

Please use my Initials Only

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION Affected ME

The State of MT

County of yellowstong

My name is Rashel Brown. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

salem MT

08/20/1998

2. How many weeks pregnant were you?

9

3. What type of abortion was performed?

suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

It wasn't explained to me that the baby would be ripped from limb to limb and that its head would be crushed.

5. Were you adequately informed of the consequences of abortion?

Yes No

I didn't know I'd hold onto it this long.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

my mother

9. How has abortion affected you?

That my child didn't deserve that kind of treatment

10. How has your abortion affected others in your life?

Distance

11. Based upon your experience, what would you tell a woman considering abortion?

Please consider adoption. That's it a loving caring feeling being in your body whom loves you no matter what

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Fetus means young one or young child. That its a living being and not a bunch of cells. It has a heart and mind and it feels pain. It feels being killed and killing is murder. THOU SHALT NOT KILL.

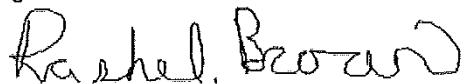
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 11/22/2010

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

AFFIDAVIT

THE STATE OF Montana §
COUNTY OF Deer Lodge §

Before me, the undersigned authority, on this day personally appeared
Sandi Taylor, (Print Name) who, being by me duly sworn, upon oath, stated
the following facts:

My name is Sandi Taylor (Print Name). My address is
711
I am over
the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have
personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the
following facts are true:

Please
See following

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

And You Think You Have A Lot Of Time:

I had just turned 21 when I went on a date with a guy I had just met. He took me out to dinner, we partied a little bit and then he date-raped me. This was way back in the '80s when date-rape wasn't talked about, much. That should have been the end of the story but because of "who knows why?" I continued to date the guy. I hadn't been a virgin when this date-rape occurred as I had also been date-raped when I was 16, so he hadn't stolen my virginity. We continued to date and have sex repeatedly. Why we weren't thinking about protection - once again - who knows? I continued to have a life outside of this relationship and began planning for a 7 day cruise to the Caribbean with a good friend. Lo and behold, a few weeks before departure I find out I am about 6 weeks pregnant. My boyfriend would like to get married but I feel we are too young, besides I don't want to be pg on my dream vacation. There will be plenty of time in the future to have the children I always dreamed of having.

So a doctor in my home town refers me to a larger city and an abortionist who will get rid of my "problem". I'm apprehensive but I don't really see this as a baby, it's only tissue, they say. I will begin having children a little later, I think to myself. But this relationship sours, he gets another girl pregnant and they marry.

I meet and fall in love with the "love of my life". He treats me with so much respect and honor. We move in together and I begin working for his touring theatre company. Life is going the way I always hoped it would. Then as we packed to take the show to a different town, I fall from the second floor loading dock as I handed down a screw or nail or something. I land in a heap at the company's feet on the cement parking lot. Ok, so I'm not hurt really bad, just bruised up a bit. Off to the show we go. But something isn't right any more. I get headaches so bad I can't lay my head on a pillow. The accident happened during work so I see doctor through workman's comp. After a couple ct scans, he's not really sure what is causing the headaches. He prescribes naproxen, which doesn't even begin to touch the pain. It is now around Christmas time and I am getting the pesky feeling of my butt being asleep again. I had experienced the symptom before and my doctor dismissed it as gheon bera or it could be ms, he casually said.

Then to a neurologist I went. There I underwent another ct scan, spinal tap, evoked something or other, and a arterialgram. He thinks it is a stroke because "ms doesn't cause headaches" This was in 1984 and after those test were done - I lost "normal" feeling in my feet. Later, the doc would relent and say that it is ms and the only thing he has to help is a diet, unless of course it gets to a life or death situation and then he would try one of the new courses of therapy that may or may not help. It quickly got to that situation when during the summer I lost all feeling below my waist. I was totally paralyzed and dependent on my parents. My dad packed me everywhere I went, I wasn't about to sit in a wheelchair, I had too much living to do. Because of an encounter with Jesus the disease began giving up the territory it had taken. But would anyone ever want to marry a somewhat handicapped girl? My boyfriend had been always there for me, but he didn't think he would ever ask me to marry him - so what would become of me - an old handicapped maid? I had asked him if I wasn't married by the time I was 32, if he would have a child with me through artificial insemination - because it would be an offense against God if we conceived the natural way. I so desperately wanted a child to love and raise.

When I was 31, God allowed me to marry while I was in ministry training. Praise God, my new husband even wanted more children than the 3 he already had. So my dream of being a mother was still alive. Then a few weeks before the wedding, I find out that he had been "fixed". So what happened to all the time I had to have children? Suddenly there wasn't any more time and I had missed my only opportunity of making my parents grandparents and having the 2-3 children I had always dreamed of having. My new step kids were pre-teens and teenagers who lived with their mother. We saw them occassionally but they weren't thrilled their dad had remarried. I love them, but I am not their mother. I was confident that I would become pregnant on my honeymoon. God could do a miracle for me like He did when I went into remission with the disease. But that was not His plan. Now I fight bitterness and anger over the fact that I've bled every month since I



was 12 years old and will never have the precious gift that comes from that.

Now I want to burst into tears every time a see a mother and child. My doctor saw the depression the abortion caused me and put me on anti depressants. They help somewhat, they keep suicide at bay but they don't numb my longing to be a mother, to experience pregnancy in its fullness. I grieve daily as I realize my heart's desire will never be possible, especially now that I am in peri menopause which I didn't expect to happen for 10 years or so. I blew it! I often think that my child could have been the one to discover the cure for multiple sclerosis and freed me from the scars that still have not been remyelinated. My child could have found the cure to cancer, rheumatiod arthritis, heart disease or the countless other diseases that are waiting for their secrets to be unlocked. I expected myself to have the type of family I had grown up with. Sports games to go to, report cards to celebrate, family vacations to go on, dinner tables to be sat around eating and playing games. Yes, I thought I had so much time to become a mother, why didn't somebody point out that the tissue I had growing in me really was a child? They sugar-coated the truth so I could go on my merry way and have the vacation of my life. Was it worth it? NEVER!!! Please don't let them do that to any other young, confused woman. Nothing could ever be worth killing a baby over.

Thank you for listening and trying to stop these terrible slaughters - S.T.

ST

I have read the above and foregoing statement and the same is true and correct.

SIGNED this 10th day of July, 2003.

Please use my: full name.

Sandi Taylor

initials only.

My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 10
day

of July, 2003.

Mary Pat Toss
Notary Public MARY PAT Toss
Conn Exp 11/04/2005

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

If someone you know has had an abortion, encourage them to complete this form.

**DECLARATION
HOW MY ABORTION HURT ME**

The State of M T
County of Stillwater

"My name is Stephanie Allestad. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? Seattle, WA
- 2) How many weeks pregnant were you? 12 - 14 What type of abortion was performed? Not sure. I assume suction
- 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: Consultation, I was told my baby was a blob of tissue. Simple, easy procedure.
- 4) Were you adequately informed of the consequences of abortion? Not at all. I suffered in silently for over 10 years
- 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 6) Did anyone pressure you into having an abortion? Yes No If yes, who? boyfriend, friends, didn't know he had a chick
- 7) How has abortion affected you? See attached

8) How has your abortion affected others in your life? See attached

9) Based upon your experience, what would you tell a woman considering abortion? see attached

10) Based on your own experience, what would you tell a court that believes abortion should be legal? see attached

You may attach additional pages of testimony, if needed.

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this 10 day of Feb, 2011.

Please use my: Full name First name only Initials only

Signature: Stephanie Allestad
My signature evidences my authorization
to use this declaration for all purposes

You may contact me Do not contact me

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

This form may be duplicated before completing. Forms can be downloaded from www.operationoutcry.org

Return To: The Justice Foundation, 8122 Datapoint Drive, Suite 812, San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279) Need Help? 1-866-482-LIFE (5433)

7) There is not a portion of my life that has NOT been affected by my abortion. From the very minute I walked out of that abortion clinic I was different. The shame, guilt, and overwhelming confusion over what I had done began to take a toll on my emotions and well-being. The uninformed decision I made do to a lack of real information regarding the abortion and what was really going to take place was not explained top me. The 5 minutes I spent in the "counseling room" was only "counseling" on how this "procedure would take care of my "little" problem. Plain and simple. They would remove the "blob of tissue" and I would be good to go. Problem solved. They LIED!!! Since I was uninformed of fetal development at the time and was in complete fear and shame over being 16 and pregnant my fear was uses against me by the abortion provider to sell my a product, a service, ABORTION. As I grew and matured into a young women and began to understand the scientific facts of the babies development in the womb. That the child they was in my womb at 16 years old have tiny, little, beautiful hands, fingers, feet, toes eyes, ears mouth and a nurse, this is when my personal horror began. How could I have done this to someone so innocent and small? How come the "counselor" was not required to explain in truth what the procedure was and what it would do to the little child inside of me? Why wasn't I told the truth? Why wasn't I required to have my parent's permission to have SURGERY that would forever change my life? How on earth at the age of 16 could I be mature enough to make this kind of life altering "choice" Answer: Because it was about selling me an abortion! And yes, I am angry. Because of what happened to me and my child I am willing to stand up and tell the truth about abortion. What it is and what it does to the growing baby inside. Just tell the truth and then let the women decide what to do. Now that's a real choice.

8) My abortion has affected other people in my life in many ways. First, I had to hide and lie to my parents about what I had done. If abortion was not a horrible, Awful, thing I would of not been so ashamed and fearful. I could of told them about the pain and suffering I was going through at the time. My eating disorder, bulimia, drug use and alcohol abuse would of made more since and I could of received help for the reasons I was hurting. My abortion affected my husband. He married a girl who was suffering from the affects of an abortion and he didn't know it. I was so ashamed of my abortion that I hide the fact that I had had one for eight years of our marriage. In fact, because I felt so strongly that I needed to make up for the life that I had taken I "got" pregnant on purpose with our first child in order to somehow redeem myself for what I had done earlier in life. I betrayed my husband. I hide this awful secret to this day from the people closest to me. Parents, siblings, and my own children. I stole from them their grandchild, niece or nephew. Brother or sister, from myself, my child.

9) What I would tell other women considering an abortion is to get all the FACTS. Know exactly how far along you are. Have an ultrasound at one of the many pregnancy clinics that will do them for free. Realize that 9 months of fear and shame of pregnancy and even adoption if parenthood is not the best thing for them at the time is a wonderful choice. 9 Months compared to a lifetime or regret is a great choice. Several times a years I count up the years and think about how old my son or daughter would be if I had made a different "choice" Abortion ever goes away. It never fixes anything, in my experience it only made things worse.

10) What I would tell the court that believes abortion should be legal is this: Stop abortion now! There are millions of women and men in this country alone that are suffering in silence because of "choice" And then all the millions of babies being slaughtered in the most dangerous place in the world, the womb. Make abortion education, fetal development, ultrasound and parental consent mandatory. If abortion is so wonderful, the abortion doctors should have no problem with this. It is just the facts.

DECLARATION HOW MY ABORTION Affected ME

The State of MT

County of Flathead

My name is Megan Petty. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Seattle WA

01/30/1974

2. How many weeks pregnant were you?

12

3. What type of abortion was performed?

Suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

The Open Door Clinic I went to told me it was a blob of flesh and that it was no big deal to get an abortion. They told they thought that I should have an abortion after they had spoken to my boyfriend and myself separately.

5. Were you adequately informed of the consequences of abortion?

Yes No

I was told that there would be no consequences of abortion. That is was a safe procedure and that there would be no complications.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

My Mother, my boyfriend at first, and the Clinic.

9. How has abortion affected you?

It ruined my life. I have not been able to have children since. I became addicted to Marijuana. I did not care what happened to me. I thought I was damaged goods after that. I wanted to die. I became promiscuous. I was extremely depressed. I became angry and bitter. I hated my Mother. I hated men. I hated life. Then I met Jesus and he started to heal me and am still in that process.

10. How has your abortion affected others in your life?

I have a hard time getting close to people. I am afraid to love. I do not like being touched very much and really have a hard time giving myself to my husband. I do not trust people at all. I feel betrayed. Seeing babies hurts my heart and I am jealous of pregnant women.

11. Based upon your experience, what would you tell a woman considering abortion?

Do not do it no matter what. You will regret it for the rest of your life. It will cause so many problems and so much grief.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

It is a violation of my womanhood and my motherhood. It is criminal since they lied to me and did not inform me of the consequences of abortion. When you step into an abortion facility you lose all your rights. I told them to stop and they did not, they instead put me out with drugs, when I woke up it was over. I was violated and robbed of my future.

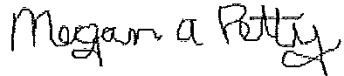
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 3/21/2009

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

In 1978 I became pregnant and went to my psychologist to seek advice. He told me to go to Rapid City and get an abortion. I was never told that my baby was really a baby, I was never told there would be pain, nor was I told that I would go through years of regret and mental anguish as a result of the abortion.

One day I silently slipped away and had my abortion. It was an easy enough procedure but it was after the abortion that I experienced the nightmare.

It was a few days after the abortion that I experience excruciating pain. I have never experienced such pain. All the muscles in my lower abdomen were agonizingly wrenched. There were no amount of pain meds in my medicine cabinet that would even touch the pain. I managed to call the doctor who preformed the abortion in the middle of the night. It was then that he told me that this could happen. I had told him what meds I had already taken. His advice to me was to take more. I was not concerned about over dosing, because at that point I had to do something and I didn't care!

I got through the night and the pain slowly subsided. I stayed in bed all the next day. I had absolutely no strength, every ounce of had been used. It was days after that I finally began to regain my strength.

I lied to the father of the child, saying I had had a miscarriage because I was so ashamed of what I did. Year after year I kept my secret and year after year I suffered not only the pain of losing my child but the guilt and shame of what I had done.

I cannot tell you the mental anguish that that abortion had on my life. To this day, I have only told a select few. I have had no formal counseling because I am too ashamed. This area is where great danger lies. Women who stuff, who appear to be healed going on with their lives, yet inside still carry the wounds and scars of killing their child. We who have had abortions have chosen to kill our children. We understand, too late, what we have done. I must live with the fact that I chose my reputation and my social appearance over the life of my child. It was my choice and I regret it to this day.

Even though my abortion was in the first few weeks of pregnancy, there was still a connective ness with the baby within me. Whether a physically formed baby is visible or not, it is a real baby and we (mother and baby) were connected.

I often wonder if it was a girl or a boy. I wonder if I would have had other children if this baby would have been allowed to live. My life would have been so different. I could have lived honestly amongst those who love me. However, even after 27 years I hide my secret.

I more than likely will never be able to prevent woman from getting an abortion, due to my concealed shame, however I can help by asking you who are the governing body in South Dakota, to make it mandatory for doctors to tell woman the facts and what they may encounter before the abortion.

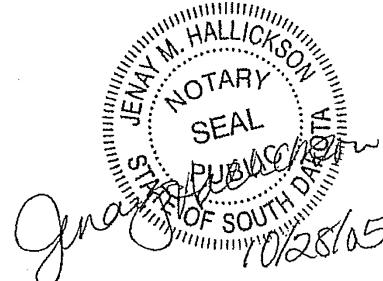
If I had known that my tiny baby was a real living life – I would not have done it.

If I had known of post abortion excruciating pain levels – I would not have done it.

If I had known the mental anguish, guilt, and shame involved – I would not have done it.

If I had known that someday I might have to disclose my terrible secret and be publicly disgraced and humiliated – I would not have done it.

Women have the right to know what will happen to them.



AFFIDAVIT

To be filled out by women who have had an abortion.

The State of South Dakota

County of Pennington

BEFORE ME, the undersigned authority, on this day personally appeared B C (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

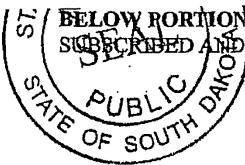
"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: June 1982 Rapid City, South Dakota
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? No, there was no information given, especially about the consequences of abortion. The main concern was that they received \$300/cash to pay for the abortion.
- 3) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No
- 4) Did anyone pressure you into having an abortion? No If so, who? My husband and I in our ignorance agreed to have the abortion
- 5) How has your abortion affected you? I have gone through every stage of grief. I've experienced anxiety, depression, anger, bitterness, resentment, unforgiveness. It's a loss like I've never felt before. My heart aches into the deepest core of my being. It is an overwhelming hurt that can still drop me to my knees. It has taken many years for me to be able to forgive myself. There is a void in my life that will never be filled because of the choice I made.
- 6) How has your abortion affected others in your life? My husband chooses not to talk about it - it is too painful for him, my 3 children were very angry; they will never know the brother or sister they could of had; they choose not to talk about it also
- 7) Based on your own experiences, what would you tell a woman considering an abortion? Be informed, get all the facts, do not make this decision on impulse. Know that you are taking the life of your child. There will be emotional, physical & spiritual pain. Step back and completely think this through. There are other options.
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? Every woman has the right to be completely informed about emotional, physical & spiritual risks of abortion. To sit here and think that abortion doesn't affect these three areas is to be sitting here in complete ignorance. How can taking the life of a child make things right?

"I have read the above and foregoing statement and the same is true and correct."

- I want to tell my story.
I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.

B K.C
My signature evidences my authorization to use this affidavit for all purposes.



(ST) **BELOW PORTION TO BE COMPLETED BY NOTARY:**

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 4 day of November, 2005.

NOTARY PUBLIC

Commission expires: 5-21-2008

You may also answer these questions by telephone with an Operation Outreach Representative at 1-877-247-7582.

Please access these forms on our website: www.operationoutreach.org or make copies of this form and distribute.

Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

DECLARATION HOW MY ABORTION Affected ME

The State of SD

County of Minnehaha

My name is Beth Douglas. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Houston TX

06/1982

2. How many weeks pregnant were you?

8

3. What type of abortion was performed?

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I received No information other than I should have someone drive me home. Nothing stating it was a human life that I was choosing to abort.

5. Were you adequately informed of the consequences of abortion?

Yes No

My memory of everything is vague, but as for any detailed information on the consequences, I dont remember any.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I was a horrible choice. My only thoughts at the time, was that it was not a good time in my life to have a baby, and the father and I were not together, we had split because he was becoming more and more abusive. Every year that passes I think of the baby I aborted, wondering if it was a boy or girl, thinking of what a wonderful life they could have had with an adoptive family. Today I have a personal relationship with Jesus Christ. I know I have been forgiven for what I did, but there is still a void in my life for the choice I made.

10. How has your abortion affected others in your life?

Others in my family dont understand why this bothers me. They claim they are pro-choice. They dont agree with abortion but that the person should choose. Obviously they dont understand what having an abortion does to the mother. I have tried to help them understand, but they are firm in their beliefs. All I can do is keep them in my prayers, and pray that if their son or daughters ever have to make the "choice" they will follow what God wants them to do. Every life has a purpose.

11. Based upon your experience, what would you tell a woman considering abortion?

I would strongly encourage her not to. Adoption is a worthy choice. It is a human being from conception. I would share my experience as well as thousands of other women who share the same feelings. How many women do we see that have had abortions that are standing up and saying they are so glad for the choice that they made???? Few and far between! I would also encourage her to have an ultra sound. She would be able to actually see the Life inside of her!!

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

How incredibly wrong they are. Again stating there are very few women saying how glad they are they did this. Most are living with the shame, and guilt that come with having an abortion. Especially as they mature and cross different points in life. The age of the child that should be is always with you.
Adoption is an alternative!!!

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 3/15/2010

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of SD

County of minnehaha

My name is C L . I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Sioux Falls SD

06/14/1984

2. How many weeks pregnant were you?

12

3. What type of abortion was performed?

vacuum

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I had no idea that the baby would be ripped apart by the vacuum. I did not think of the baby as a living person.

5. Were you adequately informed of the consequences of abortion?

Yes No

I wasn't told it could affect my future ability to have children or the daily shame and guilt I would feel.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

boyfriend

9. How has abortion affected you?

I think about the child I aborted almost everyday. I feel guilt and shame for the decision I made to end her life.

10. How has your abortion affected others in your life?

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell her that adoption is an option. I became pregnant again after my abortion, but I chose to give her life. She is a beautiful 16 year old girl today. We had an open adoption, so I see her once in

awhile. It was the most unselfish thing I have ever done in my life.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

If abortion wasn't legal at the time I had mine, I would have had her and given her up for adoption. The guilt and shame I feel would not be there as a daily reminder of my sin.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/17/2008

Please use my Initials Only

Signature

A handwritten signature consisting of a stylized letter 'C' followed by a short, downward-sloping line.

My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

The State of SOUTH DAKOTA
County of MINNEHAHA

BEFORE ME, the undersigned authority, on this day personally appeared CARRIE INGER SPROUT (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred:

OCTOBER 1994 DR. BUCK WILLIAMS OFFICE IN SIOUX FALLS, SD

- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does?

NO

I WAS ONLY INFORMED OF THE MEDICAL RISKS AND WHAT THE PROCEDURE INVOLVES. I WAS NOT INFORMED OF THE ABILITIES OF MY UNBORN BABY OR THE EMOTIONAL LONG TERM EFFECTS. I WAS NOT SHOWN AN ULTRASOUND.

- 3) Were you informed of any link between abortion and breast cancer? Have you had breast cancer? ULTRASOUND.
I WAS NOT INFORMED OF ANY LINK BETWEEN ABORTION AND BREAST CANCER. I HAVE NOT HAD BREAST CANCER.

- 4) Did anyone pressure you into having an abortion? If so, who?

YES MY MOTHER AND THE SITUATION I WAS IN. I WAS DIVORCED AND HAD A BABY WHO WAS JUST OVER A YEAR. MY MOTHER CALLED ME A DISGRACE TO THE FAMILY. I FELT THIS WAS MY ONLY OPTION AT THE TIME!

- 5) How has your abortion affected you?

AT FIRST I EXPERIENCED AN IMMEDIATE FEELING OF RELIEF FOLLOWING MY ABORTION. I THOUGHT IT WAS OVER. SINCE THEN I HAVE EXPERIENCED MEMORY REPRESSION FOR ABOUT 10 YEARS. LAST OCTOBER 2004 IT ALL CAME TO THE SURFACE AND I HAVE EXPERIENCED A LOT OF GUILT, SADNESS, ANGER, HURT AND WHEN OCTOBER COMES IT MAKES EVERYTHING ESPECIALLY PAINFUL BECAUSE IT IS THE ANNIVERSARY. I HAVE

- 6) How has your abortion affected others in your life? Also experienced flashbacks of that?
- I HOLD A LOT OF PESTMENT TOWARDS MY MOTHER. DAY! I FEEL I HAVE TO BE CAREFUL ABOUT WHO I TELL OR DO NOT TELL BECAUSE I DO NOT WANT TO BE JUDGED OR DISGRACED.

- 7) Based on your own experiences, what would you tell a woman considering an abortion?

I WOULD SAY IT IS NOT YOUR ONLY OPTION, EVEN THOUGH IT MAY FEEL LIKE IT. AFTER HAVING TIME TO REFLECT ON THE EXPERIENCE I WOULD SAY THAT ADOPTION IS THE ANSWER. TO GIVE SOMEONE ELSE THE GIFT OF LIFE IS THE MOST LOVING ANSWER AND A WIN-WIN OPTION.

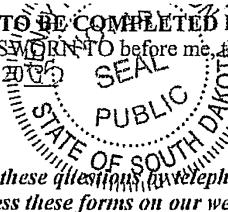
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal?

I WOULD SAY THAT HAVING AN ABORTION HAS LIFETIME EMOTIONAL EFFECTS NOT TO MENTION PHYSICAL EFFECTS. IT CREATES MORE PAIN WHICH IS THE MOST HAUNTING HURTFUL DECISION A WOMAN CAN MAKE. ABORTION IS AGAINST WHAT GOD WANTS BECAUSE EVERY HUMAN LIFE IS SPECIAL. I WOULD ALSO SAY I MISS MY SON OR DAUGHTER EVERYDAY OF MY LIFE.

"I have read the above and foregoing statement and the same is true and correct."

Signature: Carrie Sprout
My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 15 day of
November, 2009  SEAL
NOTARY PUBLIC

Cherry Hallie Brown
You may also answer these questions by telephone with an Operation Outcry Representative at 1-877-247-7582. Please access these forms on our website: www.operationoutcry.org or make copies of this form and distribute.

Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

Please check the applicable boxes:

- I want to tell my story.
- I understand that someone will contact me.
- Do not contact me.
- You may use my full name.
- Please use only my initials.

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of South Dakota

County of Minnehaha

BEFORE ME, the undersigned authority, on this day personally appeared Carrie Sanchez (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: March 1995 Atlanta
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? NO
- 3) Were you informed of any link between abortion and breast cancer? NO Have you had breast cancer? NO
- 4) Did anyone pressure you into having an abortion? Yes If so, who? Boyfriend's mother
- 5) How has your abortion affected you? It left me feeling ashamed and depressed. It heightened an already existing eating disorder. It made me aware of our previous life.
- 6) How has your abortion affected others in your life? My parents have volunteered in various to stop women from abortion. It has strengthened their faith in the Lord as they needed forgiveness.
- 7) Based on your own experiences, what would you tell a woman considering an abortion? Do Not Do it! No matter what choice you make it will not be an easy one. Let the Lord decide.
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? Where is your faith. Who are you to play God? An abortion is not an answer. It's another problem.

"I have read the above and foregoing statement and the same is true and correct."

- I want to tell my story.
I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.

My signature evidences my authorization to use this affidavit for all purposes.

Carrie Sanchez

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 8 day of Sept, 2005.



NOTARY PUBLIC

Jenay Halliburton

You may also answer these questions by telephone with an Operation Ovary Representative at 1-877-247-7582.
Please access these forms on our website at operationovary.org or make copies of this form and distribute.
Return to: Texas Justice Foundation, 6122 Babcock, Suite 812, San Antonio, TX 78229

AFFIDAVIT

THE STATE OF South Dakota

COUNTY OF Minnehaha

Before me, the undersigned authority, on this day personally appeared Carrie Sanchez, (Print Name) who, being by me duly sworn, upon oath, stated the following facts:

My name is Carrie Sanchez (Print Name). My address is 4809 S. Southeastern Ave.. My telephone number and e-mail address is 605-359-4502 CCSanchez@SID.midco.net.

I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

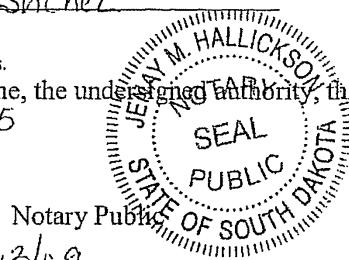
Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229. I have read the above and foregoing statement and the same is true and correct.

SIGNED this 7 day of September, 2005.
Please use my : full name, Carrie Christine Sanchez
initials only. C.Sanchez

My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this
7 day of Sept., 2005. 3:05

Carrie Sanchez
Jeffrey M. Hallickson



Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

My Story of Abortion

How can I even begin to put so many emotions on paper? I guess I should start by saying , when I was 21 I had an abortion. Years later I have found out "it" did not only affect my life but also the lives of my parents. I have remained silent about my own feelings because I did not think my family wanted it any other way. Now, I know differently and I am ready to talk.

When I was 20 I was hospitalized with a an eating disorder that I had kept a secret for 7 years. I was 5'4" , 108lbs. I had lost over 40 lbs in less than eight months. My body was in terrible health and my mental state was not the most stable. I was emotionally immature and very much dependent on my parents. After my stay in the hospital, I was allowed to return to college and my boyfriend. I continued therapy where I lied one after another. I had not changed my behaviors. The following Fall I changed colleges while my boyfriend stayed at my previous school. Two weeks after our last weekend "together", I found out he had been sleeping around on me. Since we did not always use protection and sex was a new thing to me, I went to the school nurse to be tested for any sexually transmitted diseases the next week. Before we even got around to test for STDs, I was given a pregnancy test. The nurse told me I was just pregnant. It was very light on the strip but after blood work it was definite! I was so shocked and afraid! I called my ex-boyfriend and told him he needed to come see me right away. The only way he would come was for me to tell him on the phone. He came and we talked about what we should do. I thought we were certain we'd get married. After having "make-up sex" again that night I asked a stupid question. I asked, If I had an abortion but you could never see me again or get married what would you choose?" Of course his answer was to never see me again. Once again I was shocked and afraid.

The next morning we woke up and went to my parents home. We told my mother before my Father came home. I guess we were hoping she would take the news better. Still thinking we would get married and have a baby, we all went together to his home to tell his parents. His mother insisted I have an abortion because I was NOT going to ruin her sons life! As he and his father sat there not saying a word, my parents grew furious. My father said "let's go" and on the way out Dad told my boyfriend "I hope you grow up to be more of a man than your father." I will never forget the words or the last looks I ever saw on their faces. Once again, I was shocked and afraid.

We went home to a whole new ball game. My parents were willing to support me no matter what. However, it was clear to me after a long conversation at the breakfast table what they wanted. The words that stick out to me most were " THEY will have to be a part of OUR lives forever, your body is in no shape to carry a baby so what if the baby has health problems and having this baby will change All OUR lives." The idea of having a baby and giving it up for adoption was not an option for me. I knew if I delivered a child I could never give it up.

The decision was made but I had to wait. I was only three weeks pregnant and I had to be eight weeks to have an abortion. I returned to school to wait. It was a miserable time! "Why did I have to let this "thing" grow so I could kill it????" I just tried to forget about it all. Needless to say my eating disorder got worse. About the time I was eight weeks, I began passing a thick, brown matter which I also experienced after the births of two of my children. I wonder if I had or would have had a miscarriage????

The day came, March 3, 1995, and my mother took me to a clinic in Atlanta to have the procedure. I did not want to go. I was not doing this for myself. I did not want to have an abortion. As I sat in a waiting room with other women who were having an abortion, the feeling grew stronger in me that I did not want to do this. I made up my mind. Forget the papers I signed, not even sure what they were. When they came for me(I was next) I would just tell them I did not want to do it, they would show me to my clothes and I would leave. I could explain to my mother on the way home and it would be fine. Wrong!! They came for me and as they walked me to the room I told the nurse I had changed my mind. She said let's go in and talk to the "Doctor". No sooner did I sit down to 'Talk to the "Doctor"' was she sticking me with a needle. When I woke up, I found myself in a different room laying next to the women who were in the

waiting room with me. A new nurse asked me if there was anything she could get for me. I asked if it was done and she simply said, "yes". I told her yes you can get a gun for me. I could not bear to walk out of there and face anyone! I had to. When I was walked out my mother was sitting in the office where we had started out in tears. They had to tell her I had requested a gun.

She took me home and I slept and cried for a few days. Something had to be done for me. The next decision was to put me on a plane to my cousins in Provo, Utah. I had to leave my surroundings and try to find myself or I was convinced I would die there. My parents agreed to help me go, to take time off from school and find myself. They knew I was going to a safe place with people who loved me. It was difficult for all of us. I will never forget the morning we left, I asked to go to one of my best friends home who had just had a baby boy. I am sure she has never figured out why when I held him I began to cry. I would not say I found myself in Utah but I did begin to laugh and see beauty in the world again. How can you not in Utah! Life continued and I have managed to keep my secret and hide my pain. Every time something has gone wrong in my life since then I believed it was God's punishment for having had an abortion. Every time I see a pro-life sticker, ad, or billboard I am shamefully reminded. Every time I see my friend's son who is now 10 years old I am sadly reminded. It never goes away! I would rather be able to look at my child and smile.

I am now 32, I am married and have three wonderful children. Our third child was not planned but is most definitely a gift from the Lord. At my first ultrasound, I was exactly 8 weeks pregnant. I heard the baby's heartbeat and began to cry. These were not tears of joy. I instantly thought that I had killed a heart beat just like that 9 years ago. Of course my husband did not understand but was very supportive. I had a friend who I knew counseled women like myself. I spoke to her about it one day because I began to believe no woman should be allowed to have an abortion without hearing that heartbeat. I know had I heard my first child's heartbeat that baby would be with me and I would not be writing this story. Today my friend has promised to be my strongest support as I begin a long awaited healing process. To me this is another sign that God puts people in your life at certain times for certain reasons ~ Ultimately his own.

I just went home to visit my family over the summer and had the most amazing talk with my Father. We have all come full circle with our faith walk. Dad and I began talking about forgiveness. He said God gives us signs and he had received one. I asked "What do mean". He said it had to do with me and we will probably both cry. He said on his birthday a couple years ago he was sitting in his office crying asking God to show him that he had been forgiven for the part he had played in my having an abortion. At that moment the phone rang. It was my niece, his first born grandchild, calling to wish him a happy birthday. She had never called him in the office and has never since. Dad felt like this was his sign. I did cry! I said, "I wish I had a sign like that". Dad said look behind you. My two youngest children were sweetly asleep in their car seats. It dawned on me. The many problems my children have had with their health and the fact that we had a third child we could not afford were not punishment for what I had done. My children are signs of God's forgiveness.

I then told my father that I wanted to do something with my experience that would help other women not make the same mistake I did. I was just worried my mother would not want me to tell anyone and I wanted to show her that respect. He then told me my mother was volunteering and giving large portions of her tithes to a place called the St. Francis House which houses and schools pregnant girls and single women. They also counsel but Mom has not taken them up on that part yet. I am hoping My story on paper will help. Before I left Atlanta I talked to my mother and let her know my plans. We went over the fact that we did what we thought was the best choice at the time. While that may be true it does not take away the pain or the fact that it was the wrong choice.

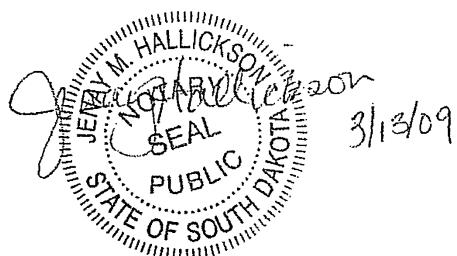
You see, My being pregnant was going to change all Our lives no matter what I did. I know God has a specific plan for our lives and He is telling me now is the time for me to take what He has given me and bring glory to Him. As hard as it is for me to forgive myself, God has forgiven me. Jesus paid the highest price for me and I am so humbled by His love. I am ashamed, regretful, and saddened by my mistake. However, I know if I kept it my secret I would never truly be able to give my life to glorify God. It is not our right to make such a mistake. If God did not want me to have that child I definitely would have

had the miscarriage my boyfriend wanted me to have. I had no right to make that call for him. Maybe I did or was going to have a miscarriage but I did not give God that chance. God knows what he is doing in everyone of our lives. It says in Malachi 3:3 that God sits like a refiner and purifier of silver. A silversmith must keep his eye on a piece of silver until he can see his reflection in the silver. We have to give God the chance to right wrongs and to be the controller of our lives. How else can he mold us into his image.?

I have had an abortion. I can tell you and my parents can tell you that it is wrong! No matter what decision you make it will never be an easy one. Your life will be change forever! Why not make the right decision. Ask yourself "What Would Jesus Do"? I think we all know the answer. I am so sorry for the choice I made. I know the affect abortion has on a woman and even a family. I would not wish it on anyone!

Carrie Sanchez

9/7/05



AFFIDAVIT
To be completed by women who have had abortions

The State of SD
County of Minnehaha

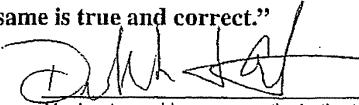
BEFORE ME, the undersigned authority, on this day appeared DEBORAH J GUTE, who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, that the following facts are true:

- 1) When and where did your abortion occur? Omaha Ne
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: They told me that they would do a D&C and explained that but not that my child already had a heartbeat
- 3) Were you adequately informed of the consequences of abortion? physically damaged
- 4) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 5) Did anyone pressure you into having an abortion? Yes No If yes, who? _____
- 6) How has abortion affected you? I have had many years of guilt & pain over the murder of my baby. I have been in counseling for 5 years to find forgiveness for myself to have done this. My abortion is the largest regret of my life and has left me emotionally scarred for life.
- 7) How has your abortion affected others in your life? w/f
- 8) Based upon your experience, what would you tell a woman considering abortion? Not to do it! It is the worst thing that a women can do to herself besides suicide.
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? A fetus is a person. When getting a abortion a women might tell herself otherwise but later in life she will know what she has done - killed her own child

"I have read the above and foregoing statement and the same is true and correct."

Please use my: Full name Initials Only

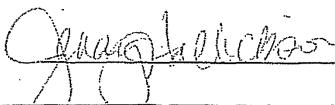

My signature evidences my authorization to use this affidavit for all purposes

May The Justice Foundation contact you? Yes No

Please print clearly

To be completed by the Notary:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 21st day of Nov., 2005



NOTARY PUBLIC

Please copy and distribute these forms or print from www.operationoutcry.org

Return To: The Justice Foundation • 8122 Datapoint Drive • Suite 812 • San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279) Need Help? 1-866-482-LIFE (5433)

DECLARATION HOW MY ABORTION AFFECTED ME

The State of SD

County of Minnehaha

My name is Dianne Heynen. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Minneapolis MN

02/03/1979

2. How many weeks pregnant were you?

13

3. What type of abortion was performed?

suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was told it was a "clump of tissue" being removed.

5. Were you adequately informed of the consequences of abortion?

Yes No

I was never told of any of the emotional or physical consequences of abortion. I had no idea it would still be haunting me now after twenty-nine years and much healing through the grace of the Lord Jesus. Even last night I had an abortion related nightmare.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I did it thinking it would be the easy way out. By choosing abortion, I thought could run away from my problem. It would all be behind me. In reality, the guilt, shame, depression, suicidality, anxiety, nightmares, drinking, drugging, etc. were all devastating.

10. How has your abortion affected others in your life?

It has brought deep sadness and regret for the baby's father, grandparents, aunts and uncles.

11. Based upon your experience, what would you tell a woman considering abortion?

Please, please, please don't do it, for your sake as well as your baby's.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Life begins at conception. Our constitution declares that our government must protect life not legalize

the killing of life.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 7/30/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

To be filled out by women who have had an abortion:

AFFIDAVIT

The State of SD

County of Minnehaha

BEFORE ME, the undersigned authority, on this day personally appeared Elizabeth F Avila (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell when and where your abortion occurred: 1992, Atlanta GA, Planned Parenthood
 - 2) Were you adequately informed of the nature of abortion, what it is, what it does? If not, explain: NO, I was told to give my chart to the front desk & that person would make my appointment, but nothing was explained as to what would be done or how
 - 3) Were you adequately informed of the consequences of abortion? NO, Not at all
 - 4) Were you informed of any link between abortion and breast cancer? Have you had breast cancer? NO & NO
 - 5) Did anyone pressure you into having an abortion? If so, who? NOT, SO MUCH. PRESSURED ME, but tried to talk me into abortion or stressed me that why
 - 6) How has your abortion affected you? Has been a long process of healing, I still have a hard time with Mother's Day & Baby Showers
 - 7) How has your abortion affected others in your life? My mom, still has a hard time on Mother's Day as well
 - 8) Based on your own experiences, what would you tell a woman considering an abortion? Whatever anybody may say this is not a quick fix this not only hurts you but kills the baby & it will effect you for the rest of your life / the life of the child not only belongs to you, but others as well like Aunts, Grandmas, uncles and so on
 - 9) Based on your own experience, what would you tell a court that believes abortion should be legal? I would ask them to consider themselves in the woman's position. I think about the life of the child what happens physically & emotionally after it is over & if abortion is the best choice then why are women so ashamed to come forward & say they made a mistake & why can't women say it's the best choice they have ever made
- "I have read the above and foregoing statement and the same is true and correct."

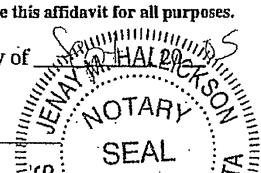
Please use my: full name.

initials only.

My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 10 day of January, 2014.

J. Vaughan Nelson
NOTARY PUBLIC



Please return this form to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT*To be completed by women who have had abortions*

The State of South Dakota
 County of Meade County

BEFORE ME, the undersigned authority, on this day appeared 9/15/2006, who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, that the following facts are true:

- 1) When and where did your abortion occur? General Hospital, Fresno, Ca
- 2) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: If I had I wouldn't have gone through with it. It was saline and I was 5 mos. along
- 3) Were you adequately informed of the consequences of abortion? No - Never

- 4) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 5) Did anyone pressure you into having an abortion? Yes No If yes, who? I was afraid of what people
- 6) How has abortion affected you? Afterwards I started I would say about the having anxiety attacks, depression, pregnancy & came to the point of almost committing suicide. Damaged my relationship with my only child. I also suffered for 16 yrs. until I experienced the blood & healing of Jesus Christ. It is still suffering this happened 36 yrs. ago in 1970

- 7) How has your abortion affected others in your life? Crippled us emotionally. Hardened our hearts.
- 8) Based upon your experience, what would you tell a woman considering abortion? No - never. Don't ever open that door to oppression; physically, spiritually & emotionally
- 9) Based on your own experience, what would you tell a court that believes abortion should be legal? The only difference between these babies & those born is the womb. It is time to recognize that they are human beings that need to be protected under the law, they are not property to be disposed of as slaves once were.

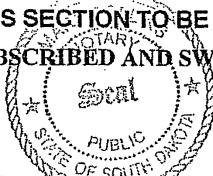
"I have read the above and foregoing statement and the same is true and correct."

- You may use my full name
 Please use my initials only

Signature: Heraldine Pizzo
 My signature evidences my authorization to use this affidavit for all purposes

THIS SECTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 15 day of September, 2006.



Mary Collins

NOTARY PUBLIC

Please copy and distribute these forms or print from www.operationoutcry.org

APRIL 6, 2010

If someone you know has had an abortion, encourage them to complete this form.

Women's Action Litigation September 2007

DECLARATION HOW MY ABORTION AFFECTED ME

The State of SOUTH DAKOTA
County of BROWN

"My name is JAN FUN MAKER. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

- 1) When and where did your abortion occur, including city and state? RAPID CITY SD 1969
- 2) How many weeks pregnant were you? 14 WKS What type of abortion was performed?
- 3) Were you adequately informed of the nature of abortion, what it is, what it does? (Check One) Yes No If no, explain: _____
- 4) Were you adequately informed of the consequences of abortion? OF COURSE NOT
- 5) Were you informed of any link between abortion and breast cancer? Yes No Have you had breast cancer? Yes No
- 6) Did anyone pressure you into having an abortion? Yes No If yes, who?
- 7) How has abortion affected you? I BECAME A CHRISTIAN WHEN I WAS 35. REALIZING THIS LIFE HAD BEEN MY BABY WHEREAS PREVIOUSLY IT WAS JUST A PROBLEM AN INCONVENIENCE 'I DID NOT WANT IT WAS AFTER BECOMING A BELIEVER I DEVELOPED A HEART, I FOUND OUT THIS WAS KILLING. I HAVE GRIEVED SILENTLY, MANY KNOW OF MY ABORTION I KEEP NO SECRETS. I STILL FIND IT HARD TO FORGIVE MYSELF. I KNOW GOD FORGAVE ME.
- 8) How has your abortion affected others in your life? I DESTROYED MY FIRST CHILD, STOLEN A GRANDCHILD, A MOTHER OR FATHER.
- 9) Based upon your experience, what would you tell a woman considering abortion? IT IS A SIN, IT IS WRONG, IT IS A LIFE WHO DID NO HARM WHO WILL BE A JOY OR AN EMPTY PAIN IN YOUR HEART FOR THE REST OF YOUR LIFE
- 10) Based on your own experience, what would you tell a court that believes abortion should be legal? IT IS CRUEL IT IS A BABY CAPABLE OF FEELING PAIN, IT HAS A VOICE IN HEAVEN BEFORE GOD AND THEY WILL BE HELD ACCOUNTABLE FOR THEIR VOTE. IT KILLS A CHILD AND DAMAGES THE MOTHER

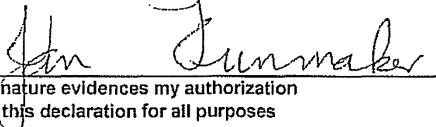
You may attach additional pages of testimony, if needed.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed this 5 day of NOVEMBER, 2007

Please use my: Full name Initials only

Signature: _____


My signature evidences my authorization
to use this declaration for all purposes

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION
(Please print clearly)

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to limit or restrict abortion.

This form may be duplicated before completing. Forms can be downloaded from www.operationoutcry.org

Return To: The Justice Foundation · 8122 Datapoint Drive · Suite 812 · San Antonio, TX 78229

Questions? Please call toll-free 1-866-4-OUTCRY (468-8279) Need Help? 1-866-482-LIFE (5433)

The State of
County of

BEFORE ME, the undersigned authority, on this day personally appeared
Karen Nelson (Print Name),
who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

1) Tell approximately when and where your abortion occurred: 1978 March - Omaha, NE

2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? Not at all. No literature was giving to me. No explanation of the procedure or any side effects. I was told it was a safe procedure.

3) Were you informed of any link between abortion and breast cancer? Have you had breast cancer? No

4) Did anyone pressure you into having an abortion? If so, who? I felt that I would tar our family name, so it was a definite pressure in that arena. I also felt pressure in the relationship that I was in. Also, the pressure to 'succeed' in life did NOT include having a baby.

5) How has your abortion affected you? I was in a downward spiral for about 6 years afterwards. I was involved in heavy drinking, promiscuous sex. I didn't know how to get out of everything I was doing - I felt trapped.

6) How has your abortion affected others in your life? My husband has put up with me to a degree where I have a hard time show my affections, my intimacy. It took along time into our marriage where I realized he wasn't going to leave me. Because after my 'experiences' all my boyfriends left me.

7) Based on your own experiences, what would you tell a woman considering an abortion? KNOW THE FACTS, CONSEQUENCES, ALTERNATIVES/OPTIONS. Get an ultrasound! Once a girl is told the "TRUTH" more than likely she chooses to carry to term.

8) Based on your own experience, what would you tell a court that believes abortion should be legal? Back in 1973 we didn't have the technology such as ultrasound machines, etc. Now that we "see" this baby moving, heart beating, sucking thumb, how can we as a NATION continue to rule that this is not a life. There is too much evidence to ignore - We must reverse this decision that was made in 1973. With all of the advancement of technology that we have, we simply have no excuse to continue the onslaught of human lives.

THE STATE OF South Dakota AFFIDAVIT

COUNTY OF Brookings

Before me, the undersigned authority, on this day personally appeared Karen Nelson, (Print Name) who, being by me duly sworn, upon oath, stated the following facts:

My name is Karen Diane Nelson

I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229. I have read the above and foregoing statement and the same is true and correct.

SIGNED this 15th day of SEPTEMBER, 2005.
Please use my : full name Karen Diane Nelson
initials only RPN

My signature evidences my authorization to use this affidavit for all purposes.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this
15th day of SEPTEMBER, 2005.

Raymond P. Crevier Jr.
Raymond P. Crevier Jr.
my commission expires on 01 APRIL 2007

Notary Public

Please return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

"I have read the above and foregoing statement and the same is true and correct."

Signature: Karen D Nelson
My signature evidences my authorization to use this affidavit for all purposes.
Print Your Full Name Karen Nelson

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 15th day of
SEPTEMBER, 2005.

NOTARY PUBLIC Raymond P. Creer Jr my commission expires on 01 APRIL 2007
Raymond P. Creer Jr

You may also answer these questions by telephone with an Operation Outcry Representative at 1-877-247-7582. Please access these forms on our website: www.operationoutcry.org or make copies of this form and distribute.

Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

AFFIDAVIT

To be filled out by women who have had an abortion.

Please check the applicable boxes:

- I want to tell my story.
- I understand that someone will contact me.
- Do not contact me.
- You may use my full name.
- Please use only my initials.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of SD

County of Pennington

My name is Kim Houchens. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

San Bernardino CA

/1985

2. How many weeks pregnant were you?

15

3. What type of abortion was performed?

Two day procedure. First day - seaweed inserted to cause dilating, 2nd day abortion performed.

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

That is all I knew. A week or so afterward I ended up with an infection in my cervix and uterus area and went to the emergency room where I was given medicine for it. I had a tubal pregnancy later that I believed that infection caused by leaving scar tissue in my left fallopian tube (which had to be removed). I was 25 at the time.

5. Were you adequately informed of the consequences of abortion?

Yes No

I was not informed of consequences other than minor bleeding could occur. I was very surprised to develop an infection. The day I went to the Family Planning clinic to have the seaweed inserted in my cervix, to begin the abortion process, they did an ultrasound to confirm the gestation age, and when I asked to see the baby I was shown a "blur" on the screen. Now, with two kids, I know at 15 wks. the baby is not a "blur". I have pics of my boys at 10 wks. in the uterus and I have plainly seen the outline of their bodies and little hearts beating. My Mom also called the clinic wanting to stop me from having the abortion and I was never informed by the workers there. I found out afterward.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I will have to live with the knowledge of what I did for the rest of my life. It is a decision that I regret but cannot change at this point. If I had to do it all over again, I would not have made the choice to have an abortion.

10. How has your abortion affected others in your life?

I was ashamed when I told my two teenage boys what I had done. I have also had to have a hysterectomy (two years ago) and who knows that the abortion didn't contribute to my physical problems that led to this surgery?

11. Based upon your experience, what would you tell a woman considering abortion?

I would talk to her about how special she is and the baby inside of her. How God can take a seemingly bad circumstance and turn it around for His glory and her benefit. This is something I did not know and no one told me at the time I was in the situation.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

It is murder and wrong. It is an immoral practice and a shame

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/7/2009

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of SD

County of yankton

My name is L R . I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Pomona SD

//1971

2. How many weeks pregnant were you?

14

3. What type of abortion was performed?

solution was injected into my womb that killed my baby and caused my to go into labor and delivery

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I wish they hadn't tried to white wash it, and make it sound like an ok option.

5. Were you adequately informed of the consequences of abortion?

Yes No

Nobody told me how much it would hurt. No one gave me the confidence I needed to keep my baby or at least let someone else be her mom.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I suffered from eating disorders. I started using drugs and alcohol and being promiscuous. I am just now after 37 years beginning to deal with it.

10. How has your abortion affected others in your life?

Yes - I broke up with my boyfriend. I don't really know, because it affected me and that affected others in my life.

11. Based upon your experience, what would you tell a woman considering abortion?

Don't do it! Your baby is precious, beautiful, and loved by God.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

That they are violating the sanctity of human life. And they are destroying precious life. That they don't know what they are doing.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/19/2008

Please use my Initials Only

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of SD

County of USA

My name is Marcee _____ I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Sioux Falls SD

12/08/1999

2. How many weeks pregnant were you?

8

3. What type of abortion was performed?

suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was not informed that I was carrying a baby. They told me it was a blob of tissue, that it was nothing. I was told it would be a quick procedure and that they would get me in and out and no one would have to know about it.

5. Were you adequately informed of the consequences of abortion?

Yes No

I was given some literature, but don't remember what it said. None of the staff informed me of any risks or consequences of abortion - physically or emotionally.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I deal with depression and anxiety. My relationships are strained. I have a hard time making friends and keeping friends. A lot of people have judged me because of my abortion, but I do share my testimony. There are some people, who have supported me, and I appreciate that. As a result of my abortion, the Lord drew me to Him, and I got saved four months after my abortion. Hallelujah! God has been faithful in walking me through my healing process.

10. How has your abortion affected others in your life?

As I shared my testimony, many people opened up and talked about their abortions, too. My own mother told me that she had an abortion in 1973, and it was a secret that she kept locked away for 25 years. By telling her about my abortion, she had the confidence to tell me about hers and in return, she has been able to work through her own healing.

11. Based upon your experience, what would you tell a woman considering abortion?

That is will be the worse choice that she could ever make. God loves her and God loves the child that she is carrying. I will tell the woman that I will support her and listen to her, praying and reaching out to her.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Abortion does hurt women - emotionally and physically. It prematurely ends life and in reality, two people die in abortion, the baby and the woman, who has the abortion, dies inside. She is left emotionally and physically wounded. Planned Parenthood is deceptive, they lie, they are cold and do not care about the welfare of women and children. Their womens' health care campaign is a hoax. It's destructive, damaging, and causes physical and emotional damage to women and families. Babies are precious and should not be considered something that can easily be disposed of, tested for medical experiments, or brutally killed through the horror of abortion. We must end the holocaust of abortion. We must end the killing. Life is a gift, not a choice. Babies are a blessing, not a burden.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 12/18/2008

Please use my First Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

AFFIDAVIT

To be filled out by women who have had an abortion.

The State of South Dakota

County of Pennington

BEFORE ME, the undersigned authority, on this day personally appeared Nancy Hook (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: April 1973 IN Rapid City, S. D. & 1977 IN Mpls,
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? No. IT WAS COMPARED TO A MISCARRIAGE ONLY. Both were PRESENTED AS A MILD SURGERY & no Consequences. I WAS sent HOME SAME hour & the drive home
- 3) Were you informed of any link between abortion and breast cancer? No Have you had breast cancer? No being
- 4) Did anyone pressure you into having an abortion? Yes If so, who? My parents & father of unborn 3-400 ON first Abortion. Father of unborn ON second one. ACTUALLY, MILES AWAY.
- 5) How has your abortion affected you? There is barely A day that goes by that I don't think about it. I have Asked for forgivance of it from God, but in my heart, I cannot forgive myself. So emotionally I still have an open wound. I drive to work each day by where the first one occurred. I AM blessed that I did marry the father of The Second one, and have 2 children. But That ended in A divorce and I have never had a successful relationship since.
- 6) How has your abortion affected others in your life? My parents & I don't speak of it. The father of the first I DON'T believe ever had children. The father of the second ended up in an accident to be permanently housed in a nursing
- 7) Based on your own experiences, what would you tell a woman considering an abortion? that the fetus is a person. And you don't want to rob that person of life. I AM adopted & found my birth mom to find out I was almost aborted in 1952. And I so, so love my boys that I did have. wouldn't remember this.
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? #7 what I answered. My sons do not know of my having abortions. But They at an early aged teen knew this to be murder. And I didn't persuade them. They just knew that life begins at conception. I cannot see how you can blind yourself to it, but yet I did at such a young tender age. I "have read the above and foregoing statement and the same is true and correct." I know the hurt remains.

- I want to tell my story.
I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.

Nancy Hook

My signature evidences my authorization to use this affidavit for all purposes.

BELOW PORTION TO BE COMPLETED BY NOTARY:

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 15th day of July, 2003.

NOTARY PUBLIC

W. B. B.

You can also answer these questions by telephone with an Operation Ovary Representative at 877-227-7582.
Please access these forms on our website: www.operationovary.org or make copies of this form and distribute.
Return to: Texas Justice Foundation, 8122 Datapoint, Suite 812, San Antonio, TX 78229

DECLARATION HOW MY ABORTION AFFECTED ME

The State of SD

County of Union

My name is Patty Miller. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Mason City IA

08/1976

2. How many weeks pregnant were you?

8

3. What type of abortion was performed?

suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

Absolutely no one explained anything about abrtion to me. it was presented as a solution to my "problem", how much it would cost, where it would take place, that it would be quick, painless (as they would use a sedative), and it would all be over. WHAT A PACK OF LIES!!!! IT WAS EXACTLY THE OPPOSITE OF ALL OF THAT.

5. Were you adequately informed of the consequences of abortion?

Yes No

No one thought there were any consequences; therefore, no information was presented.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

The doctor tld me it was the best solution.

9. How has abortion affected you?

I was so ashamed that I never talked about it with anyone, including the father, whom I later married (which ended in divorce 11 years later. He went along with the first one and wouldn't have anything to do with the second one). 30 years later I have finally gone through the entire counseling program and have finally had the burdens of the "wrong choice" lifted off me emotionally, spiritually and soulfully. The list of lifestyle problems of drugs, alcohol, sex, NO self-esteem, rebellion, anger, resentment, no self-respect (and the list goes on) have been resolved through great counseling; however, these negative thoughts and behaviors absorbed more than half of my lifetime. I am currently 55 at this writing. The \$\$price has been too high.

10. How has your abortion affected others in your life?

It destroyed my marriage to the father of my living children. Too much resentment, too much alcohol. The anger I had carried for years would not go away, so I didn't have many friends. I became an isolationist, so the people that did love me couldn't get near the way they should be able to as a family.

11. Based upon your experience, what would you tell a woman considering abortion?

If you do this to your baby(God's baby), you will experience negative emotional, spiritual and social consequences beyond your imagination. There is no escape from these consequences without professional help. No woman (or man) can get through the devastation caused by an abortion without professional help, which shows how utterly destructive this "choice" is. Women that have had abortions and say they felt no different are still in the stage of denial, which we have all gone through; however, there is NO ESCAPE from what you will experience after the stage of denial. The day I had my first child and held him in my arms was the day I realized I had truly killed 2 other babies with my poor "choice". The pain of realizing what I had done nearly killed the joy of receiving this new baby in my arms. I had to carry all of this inside my head and my heart as I was too ashamed to talk to anyone about it. There is no resolve in abortion. If having a baby seems too difficult , then LET US HELP YOU through it all. There are so many people waiting to adopt an American baby.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Obviously anyone that believes abortion should be legal either believes in genocide, hasn't had an abortion, or is just bucking for a political edge to their position. Our Founding Fathers would be appalled. and in fact wrote into the constitution the rights of the unborn. Only God, the Creator of all life, can determine life or death. Setting yourself in His position is quite dangerous and highly unrecommended, if you want any kind of a fruitful life for yourself. Please reread the Constitution of the United States of America, then you as a judge will not have to struggle so much with a decision that was already made.

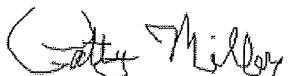
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 9/1/2008

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

AFFIDAVIT*To be filled out by women who have had an abortion.*The State of South DakotaCounty of Pennington

BEFORE ME, the undersigned authority, on this day personally appeared Rebecca Soske (Print Name), who, being by me duly sworn, upon oath, stated the following facts:

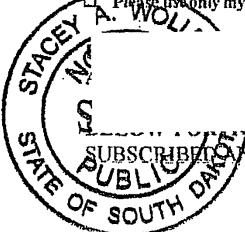
"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

- 1) Tell approximately when and where your abortion occurred: March 1987, Planned Parenthood, Billings, Montana.
- 2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does? No - I was not told about any consequences - the clinic referred to the baby as "the pregnancy" not as a child.
- 3) Were you informed of any link between abortion and breast cancer? No. Have you had breast cancer? No.
- 4) Did anyone pressure you into having an abortion? Yes. If so, who? my then boyfriend. He said he did not want to be a father. His sister had an abortion. So he said that is what we would do.
- 5) How has your abortion affected you? It caused me to be suicidal & severely depressed for years. I lost such respect for myself that I became very self-destructive: excessive drinking, being promiscuous & engaging in unhealthy relationships. It took me 15 years to work through all the consequences of my abortion, including my guilt & my grief over the loss of my child.
- 6) How has your abortion affected others in your life? They've had to deal w/my behaviors & emotions from my abortion, even though they had no involvement in the abortion. My husband supports me but he bears a burden he had no choice in.
- 7) Based on your own experiences, what would you tell a woman considering an abortion? I would tell them that what seems like an easy answer will affect them the rest of their life. I would say that they are carrying a life, not a choice & the only right choice is to give their baby life.
- 8) Based on your own experience, what would you tell a court that believes abortion should be legal? I would say that laws should exist for the purpose of benefiting Society & that legal murder of babies is detrimental to the entire United States - the "right" to choose to end life is a poor argument for allowing this genocide to continue in our country.

"I have read the above and foregoing statement and the same is true and correct."

- I want to tell my story.
 I understand that someone will contact me.
 Do not contact me.
 You may use my full name.
 Please use only my initials.
P. WOL

Rebecca Soske
My signature evidences my authorization to use this affidavit for all purposes.



STATEMENT TO BE COMPLETED BY NOTARY:
SUBSCRIBED AND SWORN TO before me, the undersigned authority, this the 13 day of September, 2005.

NOTARY PUBLIC

Stacey N. Stacey
COMM-FBI-OK-PUB 5-27-10

You may also answer these questions by telephone with an Operation Justice Representative at 210-737-5752.
Please access these forms on our website www.operationjustice.org or make copies of this form and distribute.
Return to: Operation Justice Foundation, 12200 Parkwood, Suite 801, San Antonio, TX 78249

The State of South Dakota
County of Meade

BEFORE ME, the undersigned authority, on this day personally appeared
Sylvia Rhoden (Print Name),
who, being by me duly sworn, upon oath, stated the following facts:

"I am over the age of eighteen years, and I am of sound mind and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and I do solemnly swear, or affirm, that the following facts are true:

1) Tell approximately when and where your abortion occurred:

Boulder, Colorado - 1971

2) Were you adequately informed of the nature and consequences of abortion, what it is, what it does?

I was given information pertaining to the procedure.

3) Were you informed of any link between abortion and breast cancer? Have you had breast cancer?

no, no

4) Did anyone pressure you into having an abortion? If so, who?

my husband

5) How has your abortion affected you?

As I have come to my senses with the reality of the decision to have our baby removed from my womb, the affects have run deep - piercing into my physical, mental, & spiritual being. Dealing with the truth is essential to healing however, the repercussions unavoidably continue to be experienced.

6) How has your abortion affected others in your life?

Only they alone can answer that - However I have not worked through this for 25 some years as husband + wife, shared this truth with our 3 sons, our families, our best friends + community without knowing the great loss to all involved - knowing how this decision has brought consequences to all.

7) Based on your own experiences, what would you tell a woman considering an abortion?

I have done what you're thinking strongly of doing.
Please share with me what's going on inside of you.
Would you allow me to share with you the fears of where this seemingly simple and quick solution will lead you?

8) Based on your own experience, what would you tell a court that believes abortion should be legal? According to the highest authority of our land (Declaration of Independence, Constitution), ~~is~~ the highest duty of those in delegated positions of authority is to uphold life. It is the unalienable (not transferable ... example - to women) right of every child, of every human being of every developmental stage + race + creed + color. Because those in powerful places of authority put their stamp of approval on women choosing death, I entered a realm which no woman should tread + of which I would never escape - so horrible, so real, so near was the smell of death.

DECLARATION HOW MY ABORTION Affected ME

The State of ND

County of Walsh

My name is J C I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Can't remember the city WI

04/1972

2. How many weeks pregnant were you?

11

3. What type of abortion was performed?

suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

There was absolutely no counseling prior to my abortion. I arrived at the facility and sat on some benches. They called my name and asked for the payment. I then waited for my name to be called. When I heard my name I was taken back to the procedure room and it was horrible. The entire process and procedure was cold and awful.

5. Were you adequately informed of the consequences of abortion?

Yes No

No, there was no counseling at all prior to or after the procedure. I was terrified and was treated with little respect. I do remember that while in the recovery room I started crying. A staff person approached me and stated "why are you crying? This is what you wanted". She then handed me some juice and a cookie. There was no counseling prior to or after the abortion. My soul and spirit shut down at this time as I could not grasp what had just happened - but I knew my baby was dead.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

boyfriend.

9. How has abortion affected you?

Prior to my healing - abortion nearly destroyed my life. I was a single school teacher at the time of my unplanned pregnancy. I had the abortion to save my job, not disappoint my parents, and please my boyfriend. How ironic that after the abortion I was emotionally so distraught that I quit my teaching job, told my parents and broke off the relationship with the birthfather. I was depressed, thought of death, my self esteem was gone, my goals and aspirations disappeared, I felt I could never be forgiven by God and certainly could never forgive myself. My life spiraled out of control and if it had not been for Jesus

intervening to save me I believe I would be dead today.

10. How has your abortion affected others in your life?

Prior to my healing it affected my realtionship with my husband and my realtionship with my children. I am quite sure it affect nearly all realtionships in my life - how could it not?!

11. Based upon your experience, what would you tell a woman considering abortion?

I sidewalk counsel women and men entering our local abortion facility on a weekly basis. I try tell the women entering the facility that abortion will affect their life in ways negative ways - ways they can never imagine. Abortion may seem like an easy and fast answer to an unplanned pregnancy but the result is long lasting negataive effects and can lead to death. I have stood beside the coffin of a women who had an abortion. I spoke with her once as she lamented over her abortion. She spoke of wanting to die and being with her child. She was crying out for help. Unfortunatley the next time I saw this young women she was dead. Her self desructive life style had destroyed her. This young person's life told the real story of abortion. In every abortion a baby dies and a women cries - but in some abortions both die.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

Taking the life of another human being should never be legal under any circumstance. When a women enters an abortion facility and partcipates in the taking of the life of her own child she will suffer a very negative consquence. Abortion is wrong for the baby and the women. There is no winner in an abortion - it kills the baby and it destroys the women. I would tell a court to act justly and to administer justice on behalf of the baby and the women.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 5/20/2009

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION Affected ME

The State of ND

County of USA

My name is C M I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Ft. Lauderdale FL

07/05/1997

2. How many weeks pregnant were you?

5

3. What type of abortion was performed?

I am not sure

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was not informed what was going to happen to me at all. I was just told that I would be put under anesthesia so I wouldn't feel anything or remember anything.

5. Were you adequately informed of the consequences of abortion?

Yes No

I had no preparation for the intense guilt, anguish, and loss I would feel immediately afterward and for years to come.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

the father of the baby

9. How has abortion affected you?

I was suicidal. I was depressed. I struggle daily with feelings of shame and guilt, even thirteen years later. It was the single biggest mistake I have ever made, and I wish someone could have tried to stop me.

10. How has your abortion affected others in your life?

I am still judged negatively by those who know about my abortion, including family members. My husband is struggling to help me deal with this pain in my life that occurred long before we met.

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell her that any decision other than aborting the baby will be far easier to deal with. Giving the child up for adoption or raising the child herself, although both difficult decisions to make, are the only choices she can live with. Abortion not only kills a baby, it kills a large part of the woman as well. I

would beg her to allow the child to live.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

I would tell the court that abortion is wrong for so many reasons. Abortion is not only killing innocent people, it is destroying the lives of women and families also. Women are being lied to by society, friends, and practitioners that abortion is a good choice to solve the problem of unwanted pregnancy. That is not the truth. Abortion creates more problems. It is wrong to kill, and that is just what abortion is. And the agony that a woman will endure following an abortion is nearly unbearable. If the courts care at all about people, families, women, and children, abortion would end.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 1/26/2010

Please use my Initials Only

Signature



My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION Affected ME

The State of ND

County of stark

My name is m s I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

Jamestown ND

10/1981

2. How many weeks pregnant were you?

8

3. What type of abortion was performed?

suction

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I went in to my appt. and they escorted me into a room. No anesthesia, no counseling before or after. It was physically painful and I was unable to walk out or function for the next few hours.

5. Were you adequately informed of the consequences of abortion?

Yes No

No counseling was offered nor that the child within me was a baby. Also no option for adoption was offered or explained.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

Boyfriend, his parents, my parents.

9. How has abortion affected you?

There is not a day that goes by that I don't think about the child and what effect he might have had on our world. Maybe he would have done something spectacular. How different would my life have been? A child should not have to die for the mistake I made to have unprotected sex....

10. How has your abortion affected others in your life?

No one has ever brought it up.

11. Based upon your experience, what would you tell a woman considering abortion?

I would tell her exactly what an abortion is and how it is done. I would also tell her she could give it to someone else to parent it. I would ask her and the dad why a baby has to die because they chose to have sex and irresponsibly as well. I would tell them they will never be able to undo it and will never forget...

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

I would ask them how they would feel if someone were to tell them, your child has to die because you made a bad decision, or your grandchild has to die because of decisions your daughter/son made. What is the difference between killing a child when they are 2,3,4,5 years of age versus killing a child that is only a few weeks or months concieved. Just because it could be made a law does not change the fact that it is murder and anyone who has an abortion should be tried for murder, whether it was a sane decision or not, myself included. If the child were born, it would be murder. There is no difference. Also one judge should not be able to make a decision such as this. It should never have been a question as to the definition or the act. It is an atrocity and we will have to answer to a higher power. What goes around comes around.

PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 6/4/2009

Please use my Initials Only

Signature

A handwritten signature consisting of two initials, 'M' and 'S', written in cursive script.

My signature evidences my authorization to use this declaration for all purposes.

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

EXHIBIT C

DECLARATION HOW MY ABORTION Affected ME

The State of NC

County of Onslow

My name is Tammy Litchfield. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

MI

04//1976

2. How many weeks pregnant were you?

12

3. What type of abortion was performed?

surgical

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was seventeen years old and at that time there were very few requirements of the amount of information the woman was to be given before her procedure.

5. Were you adequately informed of the consequences of abortion?

Yes No

Nothing was explained to me other than if I continued to bleed after the procedure to follow up with my Doctor and do not use the stairs for a couple of weeks. Nothing was ever stated to me of the emotional, mental despair that would occur with this decession. Nothing was given that would inform nor prepare me for the future torment, shame, grief, that would descend upon me and alter my life forever and also those in my life.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

I lived in a prison from the age of 17 until the age of 31 when Jesus Christ entered my life and so began my process of healing. I shut down and carved a very private secrete place for myself, a place of torment, isolation that no one could see. I was in continual emotional pain.I became bent on being perfect but at the same time an overly emotional and angry person. A person who's outbursts were horrifying and curel to those closet to me. I let no one in and I would not let myself out of the self-loathing that I had for myself. I hated myself. After the abortion I have had reproduction issue's and at a very early age (29) a partial hysterectomy. I have no medical statement to support that these issue's were enduced by the abortion but within myself, I know that they were spawned there.The trauma of the abortion did not present itself instantly. I evntually was unable to even look a babies, be involved with

baby showers or anything that pertained to a birth of any kind. I died. I barely functioned with daily tasks. Depression owned me. Suicidal thoughts engulfed me.

10. How has your abortion affected others in your life?

Years later when I did become a mother, I was very controlling and unloving. I held myself back from my children. I wanted them perfect so that I would not feel so bad about the abortion. Perfection drove me and I did not understand why. I made myself unlovable to those around me because I did not love myself. I was unforgiving to others because I could not forgive myself. All of my relationships were dysfunctional. Special events in my life I would sabotage because I knew that I did not deserve them so I made sure that they were ruined. I had no joy in my life. I could not even enjoy the birth of my children. I went through the motions numb. I worked hard at punishing myself and at helping others by my behavior to hate me because that is exactly what I felt for myself, hated. I have severely hurt others of no fault of their own. I deliberately drove people away from me. I was ugly. I was a murderer and I was the only one who knew that truth. The people in my life were confused, hurt, and unable to understand why I was evolving into this thing that they did not know or even care to know. I did not want to know her either but I did not know how to exit from my skin and soul.

11. Based upon your experience, what would you tell a woman considering abortion?

It has been a process of healing for me and I am very open to women of the horrors of abortion. I will be as descriptive as I have to be to get their attention. I am the expert on this subject not the deceiver who stands before them in the midst of their fear and selfishness enticing them to an appearance of a "quick fix" for the solution to their situation. I give the long term (life) truth and the results of their so called "quick fix". They are informed of the private hell that awaits them.

12. Based on your own experience, what would you tell a court that believes abortion should be legal?

That they have no concept of what the law or freedom of choice is truly about. I have yet to meet any woman who has made this same choice as I did years ago, ever state that she would do it again and that it had no effect upon her positive or negative that there is no harm in it. Women do not discuss this decision openly because of the shame that is associated with it. If she is going through the process of healing she will share but if she is not, she will suffer silently without the knowledge that she has been severely damaged by the abortion. Abortion is a silent killer for the woman. I feel that anyone who supports abortion in the legal or political area do not deserve to serve the public. They have no value for the public when they are in agreement with the act of abortion because they grant permission to terminate the unseen public. Murder is illegal in the country. We have technology that clearly shows a human being in the mother's womb. We have no excuse! Are laws and our leaders should stop the hypocrisy and allow people to be held accountable for their actions not pave a legal way for their selfish behavior. I speak from experience. Fear and selfishness were my motivator to make the decision that I made years ago.

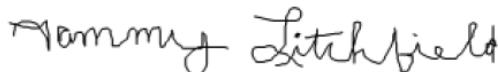
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date: 2/15/2012

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION

You may contact me

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.

DECLARATION HOW MY ABORTION AFFECTED ME

The State of TX
County of Rockwall

My name is Linda Huffstetler. I am over the age of eighteen years, and I am of sound mind and competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare under penalty of perjury the following:

QUESTIONS

1. Where and when did your abortion occur?

East Los Angeles CA

12/27/1977

2. How many weeks pregnant were you?

7

3. What type of abortion was performed?

Suction Aspiration

4. Were you adequately informed of the nature of abortion, what it is, what it does?

Yes No

I was only 14 years old acting out of fear and desperation. I didn't even give them any I.D. because I didn't have any. Also use a fake name. All I had to do is sign in. No one even talked to me until I had a gown on and was ready to wheel me to the OR room.

5. Were you adequately informed of the consequences of abortion?

Yes No

No, I was told it was a safe and fast procedure and that is all.

6. Were you informed of any link between abortion and breast cancer?

Yes No

7. Have you had breast cancer?

Yes No

8. Did anyone pressure you into having an abortion?

Yes No

9. How has abortion affected you?

During my abortion I was told by the nurses that I almost didn't make it and there was complications, I was told I would be in and out within an hour or two. I was in recovery for the next 10 hours and my boyfriend (now my husband) wasn't kept informed why I wasn't coming out into the waiting room where he had to wait. They even locked the doors due to closing time. For over 30 years I had nightmares, I suffer from PTSD, blocked memories, guilt, shame, depression, anxiety, fear, lack of trust, anger, did drugs, used alcohol, big co-dependency issues, relationship issues, difficulty with intimacy, bulimic, just to name a few.

10. How has your abortion affected others in your life?

Since I was just a teen when I had my abortion my mom, dad, sister and brother had to deal with my emotional mood swings especially with my anger outbursts. After I got married I felt that I didn't deserve my children and they would be taken from me. This made me an very overprotective mother. My husband had to deal with my anger and lack of interest in him. Trust and so many co-dependency issues that affected everyone I loved.

11. Based upon your experience, what would you tell a woman considering abortion?

I get to serve at a Pregnancy Resource Center and have been able to share with women my abortion experience. I would say 9 out of 10 after hearing what I went through will change

there minds. I tell them that most women never regret caring their babies to term but they WILL regret sooner or later having an abortion. The extreme guilt and shame will follow them all their life until by the grace of God they are healed and restored by God. 30 years later I did. Women are created to be protectors of the children. Abortion goes against this very nature. I have a son who was born after I had an abortion. He is now 30 years old. I still feel the pain of what he suffered. I destroyed him. How much more does a woman suffer if she has an abortion? But when a woman has a crisis pregnancy she acts out of desperation and fear there will be damage to either one or all three areas of her life...emotional, physical or spiritual. This is a human life that we as society says it is alright to kill. That is what it is....it is killing a human being. When is it ever alright to kill another human being? Women make uninformed decisions base on lies and then have to live with the effects that happens because of these lies. There is other options, but a women who does not know the truth believes since an abortion is "legal" it must be safe as going to the Dentist and having a tooth pulled. I know if abortion was not legal I wouldn't have had two abortions and years of suffering and regrets. This must stop!

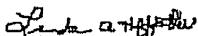
PERSONAL INFORMATION

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed this date; 9/30/2013

Please use my Full Name

Signature



My signature evidences my authorization to use this declaration for all purposes.

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION

You may contact me

I also authorize The Justice Foundation to file Friend of the Court briefs on my behalf to ban or restrict abortion.