In the Supreme Court of Ohio

PRETERM-CLEVELAND, ET AL.,

Case No. 2023-0004

Appellees,

On appeal from the Hamilton

: County Court of Appeals,

First Appellate District

DAVE YOST, ATTORNEY GENERAL OF OHIO, ET AL.,

v.

Appellants.

Court of Appeals Case No. C-220504

BRIEF OF AMICI CURIAE CINCINNATI RIGHT TO LIFE, THE JUSTICE FOUNDATION, CENTER FOR CHRISTIAN VIRTUE, OHIO RIGHT TO LIFE, RIGHT TO LIFE ACTION COALITION, CLEVELAND RIGHT TO LIFE, GREATER COLUMBUS RIGHT TO LIFE, AND STUDENTS FOR LIFE OF AMERICA IN SUPPORT OF APPELLANTS

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INTEREST OF AMICI CURIAE

Cincinnati Right to Life is a non-profit organization whose mission is to "protect[] life at every age and every stage" and "build an abortion-free Ohio and America." The organization encourages pro-life activism in the form of political action, grassroots activism, education, and prayer.

The Justice Foundation is a national non-profit organization that "seeks to protect the fundamental freedoms and rights essential to the preservation of American society by providing free legal services to promote those rights." It operates a Center Against Forced Abortions, which "provide[s] educational resources to empower women who are being forced, unduly pressured, or coerced into an unwanted abortion." It also operates Operation Outcry, "a ministry . . . that seeks to end the pain of abortion in American and around the world by mobilizing women and men hurt by abortion who share their true stories of the devastating effects of abortion."

The Center for Christian Virtue is an Ohio non-profit organization that "seeks the good of our neighbors by advocating for public policy that reflects

¹ Cincinnati Right to Life, *Who We Are*, https://bit.ly/42yvPUn (last visited May 8, 2023).

² The Justice Foundation, *Mission Statement*, https://bit.ly/3HSiIFE (last visited May 8, 2023).

³The Justice Foundation, *Center Against Forced Abortions (CAFA)*, https://bit.ly/3NPMJJN (last visited May 8, 2023).

⁴ Operation Outcry, https://bit.ly/3nEBwkG (last visited May 8, 2023).

the truth of the Gospel."⁵ The right to life is one of the Center's core values. It seeks to ensure "life is protected from its very beginning to its natural end."⁶

Ohio Right to Life promotes and defends the right to life of all innocent human beings, from the time of fertilization until natural death. Ohio Right to Life accomplishes this mission by using education and advocacy to encourage respect for human life and human dignity in the state of Ohio.

Right to Life Action Coalition is a coalition of statewide Ohio grassroots pro-life, pro-family organizations. The members of the coalition believe in strengthening the culture of life by allowing each new life the opportunity to be nurtured and raised by the child's mother and father.

Cleveland Right to Life fosters a culture of life in eight northeastern Ohio counties by promoting and defending the right to life of all innocent human beings and by rejecting abortion.

Greater Columbus Right to Life promotes a culture that protects innocent human life from conception until natural death. The organization is especially motivated to end abortion, embryonic stem cell research, euthanasia, and physician-assisted suicide, and it works to protect religious freedom and to defend the rights of conscience related to its pro-life mission.

⁵ Center For Christian Virtue, About CCV, https://bit.ly/3LIoV88 (last visited May 8, 2023).

⁶ *Id*.

Students for Life creates strategy, policy, and programming to equip those most targeted for abortion to change minds of their peers, transform communities by connecting women and families in crisis with non-violent support, and advocate for public policy that protects both mother and child from the predatory abortion industry. SFLA has chapters throughout Ohio's public and private colleges and universities.

Each of these organizations has a particular interest in opposing those working to enshrine abortion in the Ohio Constitution, in defending laws that protect mothers and their children, and in giving voice to women harmed by abortion. Thus, Amici have a strong interest in defending Ohio's law, which protects life at its earliest stages.

INTRODUCTION

The people of Ohio, through their elected representatives, have chosen to protect Ohio women and children by prohibiting elective abortions after a fetal heartbeat has been detected. Ohio Rev. Code Ann. § 2919.195(A). We refer to this statute as the Heartbeat Law. Plaintiffs–Appellees Abortion Providers have challenged that law on behalf of potential clients—women who are not in this lawsuit but on whom they say they someday wish to perform abortions. Yet there is no constitutional right to perform elective abortions. Nor do the providers have standing to assert the rights of the women on whom they might perform abortions one day. And the people of Ohio have every right to protect unborn life, maternal health, and the

integrity of the medical profession through the Heartbeat Law. *Dobbs v. Jackson Women's Health Org.*, 142 S. Ct. 2228, 2284 (2022).

This Court has already refused to grant relief to these plaintiffs in their efforts to halt enforcement of the Heartbeat Law. See State ex rel. Preterm-Cleveland v. Yost, 189 N.E.3d 820 (Ohio 2022) (in mandamus, denying motion for emergency stay). Unsatisfied with that decision, the Abortion Providers filed this lawsuit seeking preliminary injunctive relief from the Court of Common Pleas, and that court granted relief even though not a single woman seeking an abortion is participating in this case. Amici Curiae Cincinnati Right to Life and The Justice Foundation respectfully ask this Court to reverse that decision and dismiss this case for lack of standing. Because the Abortion Providers do not represent the best interests of the women whose alleged rights they seek to assert, this Court should hold that they do not have standing to bring this suit.

ARGUMENT

Amici's Proposition of Law I:

The Abortion Providers do not have third-party standing to assert the rights of patients seeking abortions because they have not alleged a sufficiently close relationship with those patients and nothing prevents patients from bringing suit themselves.

The Abortion Providers have failed to meet their burden of establishing standing to challenge the Heartbeat Law. They do not claim—nor could they—to have a constitutional right to perform elective abortions.

And they do not allege sufficient facts to support third-party standing on behalf of women to whom they may someday sell abortions.

"[T]he Ohio Constitution expressly requires standing for cases filed in common pleas courts." *Preterm-Cleveland, Inc. v. Kasich,* 102 N.E.3d 461, 467 (Ohio 2018) (quoting *ProgressOhio.org, Inc. v. JobsOhio,* 13 N.E.3d 1101, 1105 (Ohio 2014)). Although this Court has never addressed whether abortion providers have third-party standing to represent their patients, in general "[t]hird-party standing is not looked favorably upon." *Util. Serv. Partners, Inc. v. Pub. Util. Comm'n,* 921 N.E.2d 1038, 1048 (Ohio 2009) (cleaned up). It may be granted only "when a claimant (i) suffers its own injury in fact, (ii) possesses a sufficiently close relationship with the person who possesses the right, and (iii) shows some hindrance that stands in the way of the claimant seeking relief." *Id.* (cleaned up). The Abortion Providers do not meet either of the last two requirements here.

- A. The Abortion Providers have not alleged a sufficiently close relationship with patients seeking abortions.
 - 1. Interactions between abortion providers and patients seeking abortion are generally brief and very limited.

The U.S. Supreme Court recently admitted that its past abortion cases "ignored the Court's third-party standing doctrine" by allowing abortion providers to sue on behalf of their patients. *Dobbs*, 142 S. Ct. at 2275 & n.61. *Accord Cameron v. EMW Women's Surgical Ctr.*, No. 2022-SC-0329-TG, 2023 WL 2033788, at *13 (Ky. Feb. 16, 2023) ("[T]he U.S. Supreme Court clearly

expressed that its abortion jurisprudence's misapplication of its third-party standing doctrine was significant enough to cite as one of the reasons why fifty years of abortion precedent should no longer be followed.").

That's because abortion providers do not have a sufficiently close relationship with the women they claim to represent. As Justice Alito explained in *June Medical*, "a woman who obtains an abortion typically does not develop a close relationship with the doctor who performs the procedure" because "their relationship is generally brief and very limited." *June Med. Servs. L.L.C. v. Russo*, 140 S. Ct. 2103, 2168 (2020) (Alito, J., dissenting). Indeed, the record in *June Medical* showed that women seeking surgical abortions "typically meet the abortion doctor for the first time just before the procedure," have a limited conversation about the procedure, and then undergo a procedure that lasts only "two or three minutes." *Id.* (Alito, J., dissenting) (cleaned up). In that case, one abortion provider "testified that he can perform six abortions an hour and once performed 64 abortions in a 2-day period." *Id.* (Alito, J., dissenting).

Here, the Abortion Providers did not allege any facts in their complaint to support a showing that their relationships with patients seeking abortions are any different than the norm. Without facts showing a sufficiently close relationship with patients seeking abortions, their third-party standing claim necessarily fails. *Util. Serv. Partners*, 921 N.E.2d at 1048; *see also Cameron*, 2023 WL 2033788, at *16 (explaining that whether "the abortion providers are

correct that they have a requisitely close relationship with their patients . . . is difficult to discern based on the record before us").

2. Abortion providers' interests conflict with the interests of women seeking abortions because providers profit off of abortion—and abortion hurts women.

The U.S. Supreme Court has explained that a plaintiff does not have the close relationship necessary to assert third-party standing where its interests "are not parallel and, indeed, are potentially in conflict" with the third party's interests. Elk Grove Unified Sch. Dist. v. Newdow, 542 U.S. 1, 15 (2004). See also June Med., 140 S. Ct. at 2167 (Alito, J., dissenting). In June *Medical*, Justices Alito and Gorsuch recognized the potential for conflict between an abortion provider, who "has a financial interest in avoiding burdensome regulations," and a woman, who has "an interest in the preservation of regulations that protect [her] health." Id. at 2166 (Alito, J., dissenting). Here, the Heartbeat Law protects women by prohibiting a procedure that—as the Ohio women whose declarations are being filed together with this brief have affirmed in harrowing detail—often leads to lifelong physical and emotional complications. Abortion providers, however, have a financial interest in continuing to perform abortions without regard to the havoc they wreak on women's lives.

Abortion has physical, mental, emotional, and spiritual consequences for women. Amici are filing together with this brief twelve declarations by Ohio women describing their experiences with abortion.⁷ These declarations show the devastating impact abortion can have on a woman's physical and mental health.

Possible physical complications of first-trimester abortions include hemorrhage, infection, incomplete abortion (retained tissue), failed abortion, cervical laceration, uterine perforation, sepsis, and even death. *See* Ingrid Skop, *Immediate Physical Complications of Induced Abortion*, Charlotte Lozier Institute (2022), https://bit.ly/3M41fwr. This research is supported by the testimony of real Ohio women who have experienced abortion complications. Multiple women reported recurring bacterial infections, Ex. A at 1, 12, and another woman reported passing a surgical sponge and fetal tissue *three months* after her abortion, *id.* at 19.

Many women also experience complications with future pregnancies due to past abortions. For instance, one Ohio woman testified to struggling with infertility following her abortion, *id.* at 7, and another suffered four heartbreaking miscarriages, *id.* at 11. A third woman testified that she had "developed intense endometriosis, resulting in several laparoscopy surgeries and a total hysterectomy at age 49." *Id.* at 23. And a fourth woman reported "endometriosis, adenomyosis, and extreme, unexplained scar tissue." *Id.* at 21. As a result, she too was "forced . . . to have a hysterectomy." *Id.*

⁷ The combined total page number of this brief and the attached declarations do not exceed fifty pages in accordance with Ohio Supreme Court Rule 16.06.

These women's testimonies are heartbreaking tales of the harms that abortion causes to women. Amber testified that she "couldn't stand to even look at [her]self in a mirror or in other people's eyes for years." *Id.* at 3. She says that she "still hate[s] the decision that she made and regret[s] it with every fiber of [her] being," and she "still cr[ies] ever time [she] think[s] about it." *Id.* Linda testified that she "was very uncomfortable in the presence of a baby and refused to even hold a baby for years." *Id.* at 13. She further explained that she "had a huge hole inside" and "turned to food and shopping for comfort," which put her and her husband "deeply in debt." *Id.* at 13–14.

Janet testified that she felt compelled to hide a later pregnancy from the father of her aborted child. *Id.* at 16. She explained that she felt she "owed him a child" and that "even after [she had] moved on to another relationship, [she] suffered the guilt of not paying him back." *Id.* The experience "robbed [her] of some of the joy and pride [she] should have felt in [her] pregnancy." *Id.* Another woman named Lisa testified that she "had graphic nightmares for three years" after her abortion. *Id.* at 17. She explained: "In my dreams[,] I would see the procedure. I would see infant body parts in jars mixed with blood and other tissue." *Id.*

These stories evidence the trauma and harm that abortion inflicts on women. Critically, women seeking abortion often do not fully understand its potential consequences, and abortion providers frequently fail to adequately inform them of those consequences. *See, e.g., id.* at 1 ("I was told

I would feel nothing."); *id.* at 3 ("No one explained the after effects that it had on me physically or emotionally."); *id.* at 5 ("They told me that I would feel like a weight was lifted off my shoulders and no problems would arise from my abortion.").

One woman was told by a "counselor" at a clinic that "at the stage of development of [her] pregnancy," they were "talking about a lump of tissue." *Id.* at 9. "To [her] horror, much later, [she] came to see actual photographs of children at eight weeks gestation." *Id.* And she was shocked to realize "[t]hey are quite distinctly human!" *Id.* Another woman lamented that the doctor and abortion clinic were "not interested in counseling" but only in "pressing their agenda." *Id.* at 12.

To put it mildly, abortion providers did *not* represent the best interests of these women. And the Abortion Providers who filed this lawsuit have not alleged sufficient facts to show that they will do any better representing women whose interests in avoiding the harms caused by abortion stand in conflict with the Abortion Providers' interest in benefiting financially from abortion. Because these providers' interests directly conflict with the interests of the women they are attempting to represent, the providers have not alleged "a sufficiently close relationship" with their patients to establish third-party standing to challenge the Heartbeat Law. *Util. Serv. Partners*, 921 N.E.2d at 1048 (cleaned up).

B. Ohio women are not hindered from bringing suit on their own behalf.

The Abortion Providers have not shown that women seeking abortion face "some hindrance" that prevents them from bringing suit themselves. *Util. Serv. Partners*, 921 N.E.2d at 1048. Women can and do sue to protect their own rights in cases involving abortion. *See, e.g., Roe v. Wade*, 410 U.S. 113 (1973) (constitutional challenge by woman seeking abortion); *In re Doe,* No. C-050133, 2005 WL 736666 (Ohio Ct. App. Apr. 1, 2005) (granting application by minor to have abortion without parental notification); *Sorina v. Armstrong*, 589 N.E.2d 1359 (Ohio Ct. App. 1990) (medical malpractice suit by abortion patient against physician who performed abortion).

Nor would procedural hurdles prevent pregnant women from bringing suit. Claims by women seeking abortion are subject to "the capable-of-repetition-yet-evading-review exception to mootness." *June Med.*, 140 S. Ct. at 2169 (Alito, J., dissenting). In addition, "there is little reason to think that a woman who challenges an abortion restriction will have to pay for counsel," and she may "sue under a pseudonym" to protect her identity if she fears retaliation. *Id.* at 2168–69 (Alito, J., dissenting).

The Kentucky Supreme Court recently rejected abortion providers' attempt to raise the rights of their patients for similar reasons. *See Cameron*, 2023 WL 2033788, at *16. Just as with the Abortion Providers here, the Kentucky abortion providers "provided no argument as to why their patients would be *unable* to challenge the bans pseudonymously, nor ha[d]

they explained why a court order would be insufficient to ensure their patients' identities remain protected." *Id.* (cleaned up). This Court should follow the same course and reject the Abortion Providers' attempt to assert third-party claims without establishing that a barrier bars women from bringing these claims themselves.

C. The cases the Abortion Providers and the trial court relied on are distinguishable and no longer good law.

In the trial court, the Abortion Providers cited several Ohio cases to support their third-party standing arguments. *See* Plaintiffs' Reply in Supp. of Mot. for TRO at 2. But only two of those cases even address abortion, and neither confers standing in this situation. In *Akron Center for Reproductive Health v. North Coast Christian Community*, the Ohio Court of Appeals allowed an abortion clinic to assert third-party standing on behalf of its employees and patients against picketers under trespass and tort theories, but that case did not concern a challenge to a state abortion law or any alleged constitutional right to abortion. No. 12414, 1986 WL 7753, at *1–2 (Ohio Ct. App. July 9, 1986). And in *Preterm Cleveland v. Voinovich*, the Court of Appeals declined to address third-party standing because the issue was not raised. 627 N.E.2d 570, 573 (Ohio Ct. App. 1993) ("No issue has been raised as to the standing of the plaintiffs to maintain this action.").

The Abortion Providers argued below that "Ohio courts follow federal standing law," and that "federal courts have consistently held that abortion providers have standing to raise claims to protect their patients'

fundamental right to access abortion." Plaintiffs' Reply in Supp. of Mot. for TRO at 3 (cleaned up). The trial court agreed, citing the plurality portion of a U.S. Supreme Court opinion for the proposition that abortion providers "are in a 'sufficiently close' relationship with the person who possesses the right to abortion." Prelim. Inj. Order at 26 (citing *Singleton v. Wulff*, 428 U.S. 106, 117 (1976) (plurality)). As *Dobbs* correctly observed, though, the Court's old abortion cases "ignored the Court's third-party standing doctrine." *Dobbs*, 142 S. Ct. at 2275 & n.61. So continued reliance on those cases—and on lower court cases that rely on them—is misplaced.

Additionally, the *Singleton* plurality's suggestion that women face sufficient obstacles to asserting their own rights was not true in 1976—and it is much less true today. As the Kentucky Supreme Court explained in *Cameron*, even the *Singleton* plurality contradicted itself on this point. It "effectively stated that there were genuine obstacles to a woman seeking an abortion to challenge the statute herself—anonymity and imminent mootness—but then, *in the same paragraph*, acknowledged that they were not genuine obstacles at all." *Cameron*, 2023 WL 2033788, at *14 (emphasis in original). Indeed, the plurality conceded that "[s]uit may be brought under a pseudonym, as so frequently has been done." *Singleton*, 428 U.S. at 117 (plurality). And it recognized that a "woman who is no longer pregnant may nonetheless retain the right to litigate the point because it is capable of repetition yet evading review." *Id.* (cleaned up). *Accord June Med.*, 140 S. Ct. at 2168–69 (Alito, J., dissenting).

"[W]hatever the supposition of [the] 1976 [Singleton] plurality, in the years since interested women have challenged abortion regulations on their own behalf in case after case." June Med., 140 S. Ct. at 2174 (Gorsuch, J., dissenting) (collecting cases). Against that backdrop, the trial court here erred by concluding that women are sufficiently hindered in their ability to assert their own rights, Prelim. Inj. Order at 26–27, and this Court should reverse.

CONCLUSION

The Abortion Providers do not have standing to challenge the Heartbeat Law because they cannot assert the interests of women who may someday be pregnant and wish to seek abortions from these providers. Because the Abortion Providers' financial interests conflict with women's health and safety and because they have not established the required close relationship or hindrance for third-party standing, Amici respectfully ask this Court to reverse the decision below and remand with instructions to dismiss for lack of standing.

Respectfully submitted this 8th day of May, 2023.

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Dated: May 8, 2023 /s/ James A. Campbell

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Exhibit A

DECLARATION HOW MY ABORTION AFFECTED ME

| The State of OH | |
|--|----------|
| County of Franklin | |
| My name is Christina . I am over the age of eighteen years, and I am of soun competent to make this declaration. I have personal knowledge of the facts stated in this declaration declare under penalty of perjury the following: | |
| QUESTIONS | |
| 1. Where and when did your abortion occur? | |
| Hartford CT | |
| //1995 | |
| 2. How many weeks pregnant were you? 12 | |
| 3. What type of abortion was performed? Sunction | |
| 4. Were you adequately informed of the nature of abortion, what it is, what it does? ☐ Yes ☑ No | |
| I was told that the abortion was just the removal of tissue mass. | |
| 5. Were you adequately informed of the consequences of abortion? ☐ Yes ☑ No | |
| I was told I would feel nothing. First, I felt the ripping of the suction going through me. There after no longer emotionally stable. I had nightmares, chronic depression, and reoccurring of bacterial infections, which could only be explained by the two abortions I had. | r, I was |
| 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 first30 yr old manI was 17 and 2nd.my aunt | |
| 9. How has abortion affected you? | |
| Having an abortion has changed my life forever. I was seventeen when I had my first abortion and when I had my second I now have three children, my oldest 16. When I look at the blessed ch | |

that God has created, and see what and amazing plan He has created for my children. I think of what could have been for my other two children. So when I look at my children I am always reminded of the two babies, I had aborted. You one day realize you aborted a child that God created for greatness. I know that God has forgiven me and I can say that I am healed. The truth never leaves you. Frankly I really don't want to forget. It's the passion that grips my heart, to keep standing for the justice of these

really don't want to forget. It's the passion that grips my heart, to keep standing for the justice of these unborn children. What I remember the most quite frequently; is the ripping. I know that I will be completely healed when Jesus takes us home and I see my children in heaven waiting for me. I thank God for forgiving me. I have come to realize, God has now made it clear what the cause is... Abortion is murder and it must stop. It not only takes and life but it can even destroy those involved.

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

In a negative aspect my aunt is still affected by her part in talking me into it. She is Catholic, so after 10 years, she has asked for my forgiveness but, I she holds the hurt and choice deeply. By the grace of God, my children have been so compassionate and merciful. They believe also they will see their siblings in heaven. As a family our passion is to stand in truth and in love. My daughter and I have become involved in whatever way possible to stand for Pro-life and minister to mothers and young daughters. Voices...

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

I would tell other women, young girls, and boys of my own personal experience. I would minister to them in love and truth. Pray and tell them what God says about abortion. Most importantly, let them know this is a child.

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

Please overturn Roe vs Wade. This henious crime has taken the lives of so many. Whether lack of knowledge, or truth. The bottom line is when a woman says she can do whatever she wants with her body with no regard to the child, it's selfish. Though the child may be carried in our womb, we don't have the right to take this child's. I am always reminded of how simple a woman can be charged for doing drugs and carrying this child; what makes this crime any different.

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: 2/12/2008 Please use my Full Name

Signature

Canatana

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 OH

County of ashtabula

My name is Amber 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

| Where and when did your abortion occur? Cleveland OH |
|--|
| //2005 |
| 2. How many weeks pregnant were you? 7 |
| 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 |
| No one explained the after effects that it had on me physically or emotionally. |
| 5. Were you adequately informed of the consequences of abortion?☐ Yes ✓ No |
| No one told me that it could stop me from ever being able to have kids again or that it could kill me. No one told me how developed the baby was at that stage. |
| 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 couldn't stand to even look at myself in the mirror or in other peoples eyes for years. I still hate the decision that I made and regret it with every fiber if my being. I still cry every time I think about it.It hurts everyday to know that I will never know the my child that I murdered. |
| 10. How has your abortion affected others in your life? |
| No one knows. I have never told my family out of fear of what they would think or say. I secluded them |

out of my life for a long time so I guess you could say they lost a daughter without never really knowing

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

Please don't do it. You will regret it forever. Give the baby up for adoption. IT'S ALIVE AND YOUR

BABY!! What if you were aborted? It's going to feel it. It's murder. Love someone more than you love

yourself. It's defenseless please have mercy.

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

Maybe you should have been aborted and the prolifers could have took your place to make things right because life starts at birth not conception right? If you don't agree with my statement then you should realize the truth, that life begins at conception and 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: 4/5/2008

Please use my First Name

Signature

Amber

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

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION

Do not 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 S | State | of O | Н |
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|-------|-------|------|---|

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| County | Λf | Fran | klin |
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| My name is Ashley I am over the age of eighteen years, and I am of sound mind and compete 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? Columbus OH 03/05/2004 |
| 2. How many weeks pregnant were you? |
| 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 |
| All I was told that I was doing the right thing. The clinic told me nothing about how the procedure what done, the development of my baby. |
| 5. Were you adequately informed of the consequences of abortion? ☐ Yes ☑ No |
| Once again I was just told I was doing the right thing because I was young. This was by the clinic. They told me that I would feel like a weight was lifted off my shoulders and no problems would arise from my 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 |
| my mom and the father of the baby |
| 9. How has abortion affected you? |
| It ripped a hole in my heart. I still cry about it. I will always long for that baby. I will go through my whole life feeling like there's something missing. My baby. |

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

I think some were saddened by it. But no one really knows the extent of my pain.

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

I would tell her to not make the same mistake I did. Tell her about the pain I endure every single day. I would have her look at the fetal development. I had mine at 7 weeks and at the time I had no idea that my baby had little fingers and toes. That my baby's heart was indeed beating. It ripped me apart and I wouldn't wish it upon my worst enemy to have to live with this kind of pain and guilt. I would tell her that she CAN in fact have this baby or give the baby up for adoption. All I kept hearing was I CAN'T. No one let me have a voice and I went against something I believe in. I went against what I felt in my heart.

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

Nobody knows how much it hurts until you go through it. The abortion clinics don't give women all the facts. They don't tell you truely how the procedure is done. They don't tell you the other options you do have. They make post abortive women who regret their abortions feel like we don't have a voice. Circumstances change, abortion is forever. I would really like one of them to sit down and watch how an abortion procedure is done. It's a heartwrenching thing to go through. Most women who choose to abort are not in a clear state of mind. They are in a state of confusion. They are overly emotional and it doesn't help to have people not give you all the options. It's a baby, a beating heart, it's a 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: 5/15/2008

Please use my First Name

Signature

Smut

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 | ОН |
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| County of | of F | airfi | eld |
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My name is S 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:

QI

| UESTIONS |
|---|
| 1. Where and when did your abortion occur? Buffalo NY //1974 |
| 2. How many weeks pregnant were you? |
| 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 The procedure may have been explained, but the effect it would have on my life was not. |
| Were you adequately informed of the consequences of abortion? Yes No No one told me it could result in infertility, divorce, depression, and many more consequences I could not even imagine. |
| 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 clinic, media |
| 9. How has abortion affected you? I have suffered from depression, extreme guilt, infertility, not to mention have been divorced and have intimacy issues |
| 10. How has your abortion affected others in your life? |

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

former husband and his family.

RECONDISER. It may seem like the only option, but so many women have suffered from its effects,

It took the life of my child most importantly. Also, it caused much distress in my family as well as my

both physically, mentally, and spiritually. Take a look at the 3 and 4D images of babies in the womb, and see your baby! Also, there are MANY people who would love to adopt.

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

Consider the human beings who are affected the most--the baby and the mother. Stop looking at whose "rights" are being violated, consider whose life is being taken away. What would you say to your mother if you knew she were considering aborting 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: 6/17/2008

Please use my 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

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 OH |
|---|
| County of Scioto |
| 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: |
| UESTIONS |
| 4. Where and when did your abortion accur? |
| Where and when did your abortion occur? Columbus |
| 08/03/1977 |
| |
| 2. How many weeks pregnant were you? 8 |
| |
| 3. What type of abortion was performed? D & C, suction |
| 4. Were you adequately informed of the nature of abortion, what it is, what it does? ☐ Yes ☑ No |
| I remember distinctly that the "counselor" told me that at the stage of development of my pregnancy, "we're talking about a lump of tissue." I imagined it as being like a piece of uncooked chicken fat, and that is pretty much how it was described. To my horror, much later, I came to see actual photographs of children at eight weeks gestation. They are quite distinctly human! Little arms, little legs, little heads and faces! I can't tell you how difficult it has been at times to view pictures of ultrasounds of friends, knowing that I killed my own child who looked just like that. |
| 5. Were you adequately informed of the consequences of abortion? ☐ Yes ☑ No |
| I only knew that it would terminate the pregnancy. I had no idea it would change my life forever. |
| 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, the baby's father |
| |

9. How has abortion affected you?
For years afterward, I had obsession

For years afterward, I had obsessively intrusive thoughts of self-destruction. I wanted to hang myself or burn myself alive. I saw myself as absolutely evil. I always tended toward depression, but the abortion made life unbearable. It is a miracle I survived. It was over twenty years later that I came to know Jesus Christ as my Savior and Lord. Only by the grace of God and His forgiveness have I begun to heal. I still never talk about the abortion with anyone. I know that there is no condemnation for those who are in

Christ Jesus (Romans 8:1), but I am not yet sure I could handle talking about it with anyone. The pain is too deep.

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

I have never been able to maintain a long-term relationship, no matter how hard I've tried. I have been married four times, although my first husband died. The only people I have told about the abortion were two of my husbands, who betrayed me by telling my father. He was devastated. I pretended like I had no idea what he was talking about. There was no way I could handle the emotional consequences of it all.

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

I would tell her that no amount of pain or inconvenience in carrying a baby full term and giving birth could possibly compare to the life-long pain and agony that follows abortion. I would tell her that human life is precious, and that a child, even conceived in unfortunate circumstances, is a gift. I would tell her that those who advocate for abortion are trying to sell a pack of lies. No one can take another life, particularly one in her own womb, and not be affected by it for the rest of her life.

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

Abortion is murder, not only to the child, but also to the woman receiving the abortion. Death is not just losing breath and heartbeat. Death is separation from life and vitality. The abortion which takes the child's life also takes from the soul of the mother a portion that will never be replaced. I wish abortion had not been legal in 1977. I know that I would never engaged in premarital sex if it had not been legal! Abortion was always in the back of our minds as a contraceptive "safety net," so to speak, and I think that the same mentality is still prevalent today. This is an evil mindset because it causes very much harm.

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

mo

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

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION

Do not contact me

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

| The State of OH |
|--|
| County of Summit |
| My name is Margot . 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? KY 05/22/1982 |
| |
| 2. How many weeks pregnant were you? 10 |
| 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 given no information as to the nature of the procedure either before or after the abortion. |
| 5. Were you adequately informed of the consequences of abortion? ☐ Yes ☑ No |
| No one informed me that I could get an infection and end up dying in a hospital. No one talked about the depression, miscarriages, and suicidal thoughts that would torment me for decades. |
| 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 and Planned Parenthood |
| 9. How has abortion affected you? |
| I have had 4 miscarriages, struggles with depression and suicide. I have been fortunate to have a Christian church that has created a safe place for me to heal in my heart and for that healing to transcend through my body. |

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

in marriage counsoling to bring repair and unity in that place that abortion distroyed.

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

I would say to a woman to truly see herself. Abortion will not end a problem. Abortion will create more problems, it does not absord the issue. The outcome of abortion is death, possible drug use, more pregnancies that will not end in life, mental torment, disease and infection, disconnectedness from

Just this summer I have told my children (ages 16, 14, 10) of what I choose for their half brother. It has validated the longing that they have expressed about wishing for an older brother. My husband and I are

family and friends. I have never met someone that has clamed that their abortion was the best thing that they have ever done. There are more choices than abortion - don't be like me and live a life of regret.

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

It seems to me that a court that would choose death for generations of potential people with dreams and ideas to move a nation into innovative and creative thinking is a court that can not be trusted. I choose to tell my story in hopes that the courts would listen and examine the facts and no longer make it legal for a woman to choose death for her children. No one ever informed me of the infection I would get. No one ever informed me of the reoccurring trauma I would face as my body would experience something that would trigger the abortion. No one ever informed me of the stress and grief that I would cause my future husband and children. No one ever informed me of the medical problems I would inherit from abortion. No one listened to me and my concerns before the abortion. Abortionist and Planned Parenthood are not interested in counseling, they are interested in pressing their aggenda which the courts have given them the right to. It is time for the courts to fight for the future of this county. I am a voice for the 50 million babies who have not had a chance.

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: 7/31/2008

Please use my Full Name

Signature

Margot

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

County of Wayne . 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//1991 2. How many weeks pregnant were you? 12 3. What type of abortion was performed? dilation curretage 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 completely unaware of the emotional, psychological and spiritual impact. 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 baby's father 9. How has abortion affected you? For years I was emotionally and spiritually crippled. I was very uncomfortable in the presence of a baby and refused to even hold a baby for years. I immersed myself in my work so I wouldn't have to face the guilt, shame and grief. I moved 1,200 miles away thinking I could escape my past only to discover that was simply not possible. I sank into depression. I turned to food and shopping for comfort. I became very ill requiring me to live a life in isolation for months. I had a huge hole inside of me. I kept my dirty little secret locked away for years. I couldn't bear further rejection. I aborted what would be my only child. I have never known what it is to carry a baby past the first trimester, to feel it growing inside, to

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

and love I am now healed, and work to help other women find hope.

The State of OH

It has had a tremendous impact on my husband. I met him years after the abortion, but he was left to pick up the pieces. I was difficult to live with because of my emotional state - depression, moodiness,

bring it into the world. I don't know what it is to be a mom to a child of my own. My dreams were stolen from me - they were sucked right out of me. The sense of loss is tremendous. By God's mercy, grace

shame, guilt and unresolved grief. I put us deeply in debt due to my shopping addiction, to the extent we eventually had to declare bankruptsy.

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

I would share my experience as well as share the potential psychological, spiritual, and physical effects. I would encourage her to not allow others to pressure her into making a decision that may adversly effect her for the rest of her life.

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

Abortion is lifechanging. The psychological, physical, and spiritual impact is tremendous - research has proven it. Allowing something so devastating to individuals and society as a whole is tantamount to encouraging a pandemic. If there was a disease, toxin, virus, or bacteria that took as many lives as abortion, billions of dollars would go toward irradicating it. It is time for the truth to be told! How many more millions of lives have to be lost? Abortion will continue to rock our society for generations even if it is halted today. Millions of lives have been snuffed out, robbing our society of their gifts and talents, as well as financial contributions. It is beyond irresponsible to allow abortion to continue. To use the verbage "freedom of choice" is perpetrating a lie! A child is not a mistake or an inconvenience. It is a life, a miracle. Abortion is destruction of life - the baby's, the mother's, and our society's. Abortion steals the life of a child. The very foundations of our society are eroding due to this atrocity. It 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: 8/5/2008 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

| The State of OH |
|--|
| County of Cuyahoga |
| My name is Janet . 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? Pittsburgh PA |
| 07//1985 |
| 2. How many weeks pregnant were you? |
| 6 |
| 3. What type of abortion was performed? Vaccum/Suction |
| 4. Were you adequately informed of the nature of abortion, what it is, what it does? ☐ Yes ☑ No |
| I may have been given a written explanation statement to sign before the procedure. All I remember is that I was told to lay very still. The nurse told me I could squeeze her hand if it hurt too much. I don't believe I was even given any kind of cervical numbing agent. I had been in the office for several hours and I was obviously unsure, teetering on changing my mind. I was told I was the last procedure for that day and that I had to make a decision or leave and come back the next day. I had come from out of town and I couldn't come back the next day. I don't remember any real verbal explanation. |
| 5. Were you adequately informed of the consequences of abortion?☐ Yes ✓ No |
| I was told to see a doctor at 6 weeks post abortion. I was not told about any emotional or physical consequences. I was not offered any post abortion counseling. Given my state of mind that day, it should have taken place. |
| 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 pressured myself. |
| 9. How has abortion affected you?In so many ways I didn't realize. The abortion procedure was humiliating and confusing, even though I |

felt at the time that I was making a knowledgable and mature decision. I was emotionally abused by the father of my child post abortion. I remained in the relationship where I was emotionally manipulated for 5 1/2 yrs following. He told me I owed him this life and I believed him because ultimately I had made this decision, regardless of his support. Because of my secret, I was distrusting, depressed and I had trouble developing healthy male relationships in the future. I felt tremendous shame for many years,

hiding my abortion from friends and family. I never realized that I had a right to mourn my baby. My baby was considered a "non-person" until my healing came.

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

I believe my abortion affected the father of the child quite negatively. He was a drug user who was only moderately involved in illegal drugs until after the abortion. He ultimately became an addict and dealer. He'd been involved in a forced abortion as a teen and my abortion opened his old wounds. He inflicted the pain of his own guilt on me immediately following the abortion and for years following through his emotional manipulation of me. I owed him a child and even after I moved on to another relationship, I suffered the guilt of not paying him back. Even though I'd moved on and developed a loving relationship with my husband, when I became pregnant in that relationship, I hid myself and my pregnancy when I saw my exboyfriend at a store one day. Out of the shame I felt for not giving him a child he'd told me I owed him. It was brief, but it robbed me of some of the joy and pride I should have felt in my pregnancy. I was unable to share with my parents. I hid my abortion so that they would not see that I failed. They never had the chance to meet their grand child.

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

You never realize what you will experience physically, emotionally or mentally before you make this decision to have an abortion. You have no control how it will affect you. It is final and can not be reversed or changed. When you give life to your child, you have control over your choices...to parent or to choose the adoption choice. Every step of the way and there are plenty of resources to support the life choice. There is no shame in choosing life.

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

I had my abortion at 20. I was legally able to make my choice. Had I been required a 24 hour wait, I probably would have changed my mind and perhaps the father and I would have had time to agree on our decision. Abortion doesn't free men and women, it binds us and robs us of our esteem, our dignity and the joy of giving life to someone, either by choosing to parent or choosing adoption options. My life would have been dramatically different had I given birth to my child. I regret my choice and feel that most women will feel the humiliation, shame and guilt that I felt after my abortion. I felt I'd made an intelligent decision, and despite that, I had no idea what it would do to me in my future.

PERSONAL INFORMATION

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

Executed this date: 12/16/2008

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

The State of OH

County of Geauga

| 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 uppenalty of perjury the following: |
|---|
| QUESTIONS |
| Where and when did your abortion occur? Akron OH |
| 04//1996 |
| 2. How many weeks pregnant were you? 16 |
| 3. What type of abortion was performed? DNC |
| 4. Were you adequately informed of the nature of abortion, what it is, what it does?☐ Yes ☑ No |
| I did not know what was going to happen to me when I went into the clinic and when I was in the operation room. It wasn't until later that I learn it was a DNC procedure. |
| 5. Were you adequately informed of the consequences of abortion?☐ Yes ☑ No |
| No one said anything to me other than "minor side affects" like bleeding and cramping. |
| 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 at the time |
| 9. How has abortion affected you? |
| I have deep regret and pain. When I think about it, I cry. I was extremely depressed for years after my abortion. I felt guilt and terrible shame. I felt dirty and a wrech. I not only committed this sin before Go but also felt so much shame and had this hidden deep secret from the world of what I had chosen to |

do. I felt alone and isolated. No one could know or I would be rejected. I hid it for many years. It was a deep dark secret hidden in the deepest parts of my heart that only God saw. For six years after, I battled severe sadness, depression, nightmares, panic and axiety, extreme bouts of anger. After the procedure, I had graphic nightmares for three years. I would wake up in a cold sweat. In my dreams I would see the procedure. I would see infant body parts in jars mixed with blood and other tissue. I had dreams like this over and over, for about three years or more.

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

My father an my mother found out years later. They experienced deep hurt and sadness for the loss of

these two children. It was very difficult for me to talk with them about what happened. It is a skeleton in the closet we still do not discuss. It put a gap between me and my mother for a while.

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

I would go with her to have an ultrasound done. If I had seen what my babies looked like, I would not have been able to have them terminated. I would tell her everything that happened to me. How I hated myself for so long and punished myself for what I had done. I would tell her about the nightmares and the only way I found relief was through forgiven and salvation from Jesus Christ. I would go with her to a place that would help her get counseling to deal with the feelings of sadness and guilt of getting pregnant. I would tell her that she has other alternatives to abortion. I would go with her if she needed me to tell her parents.

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

I would tell them who I am and my story. I would tell them that it has been thirteen years since I had an abortion and the pain is still there. I still weep over what happen. I still cry over the loss of my two children. The only two children I would have had. It has been thirteen years later and I still do not have any children. I would tell them that life starts at conception, and no one can decided when to end a life save for God himself. The pain and suffering of abortion far out weighs the temporary pain of pregnancy. There are other options in this country, and abortion should be one that is forbidden. Abortion is not a freedom of choice for the woman. It should not be a choice. When a woman makes the choice to terminate her pregnancy, she is removing and voiding and right or rights the infant has to live. Abortion makes infants "fetus" and object or property not human. Abortion is comparable to slavery and segragation. Abortion give the woman a right to own a "fetus" and do with it what ever she wants. If slavery was abolished in this country, why isn't abortion? Every human in the united states has a right to freedom and freedom of choice, and the infants freedom of choice is to live. So we should grand them their rights.

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: 1/20/2009 Please use my First Name

Signature

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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

| | The State of OH |
|---|--|
| | County of Trumbull |
| | My name is W L. 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 |
| | Where and when did your abortion occur? Pittsburgh PA |
| | 06//1982 |
| | 2. How many weeks pregnant were you? 6 |
| | 3. What type of abortion was performed? I wasn't told |
| | 4. Were you adequately informed of the nature of abortion, what it is, what it does? ☐ Yes ☑ No |
| | I knew it meant I wouldn't be pregnant but I had no idea of what the procedure would entail. Noone explained the intense pain of the procedure, I remember it like it was yesterday. |
| | 5. Were you adequately informed of the consequences of abortion? ☐ Yes ☑ No |
| | They informed me that I would bleed some. Nothing about how emotionally and physically damaging an abortion is. They also neglected to tell me that it could be an incomplete abortion. I found that out 3 months later when a surgical sponge with fetal tissue on it came out of me. |
| | 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 Family Planning facility |
| | 9. How has abortion affected you? I felt a myriad of emotions over the last 27 years; guilt, shame, dirty, unworthy, depressed, confused, sad, a murderer, undeserving of the title "Mom", broken relationships, divorce, the list goes on. It |

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

caused a domino affect in my life that is still being played out.

Because I felt bad about what I did, it affected my relationships with other women/mothers, especially pregnant women. I don't think they knew why I would withdraw from them. I belive my younger sister had bittersweet feelings when she would tell me she was pregnant again, she has 7. My mom felt guilt & shame because she took me, so it became a burden in her life. I'm not altogether sure I know how it affected them.

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

Please don't do this. Do you know what they will be doing to your & your baby's body. Ask for more information before you make this decision. There is a life growing inside you that you need to defend. That little boy/girl didn't ask to be planted in your womb, you did (in most cases). There are other options for you to choose and alot of people out there that can help & that care for you & your baby. I have been where you are & I can share my story with you, just say when.

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

You don't know what a miracle conception is. How a woman's body reacts to sperm when it enters her. It's a foreign body & needs to be destroyed. So, our body goes into defense mode to kill off the invader. The fact that 1 sperm makes long journey & enters in to the egg is a miracle in itself. Viola! a life has been created. Not this politically correct term fetal tissue, a fetus, a.k.a. a baby. When was the last time you asked a pregnant woman when her "fetus" was due? How about, is August 10 the date you chose to murder your "baby". You're sending out a smoke screen to confuse the real issue of "PERSONAL RESPONSIBILITY." Now that would be a real fire.

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: 4/21/2009 Please use my Initials Only

Signature

W

J. P.

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

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| FOUNDATION | | | |
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You may contact me

The State of OH

County of Montgomery

I am over the age of eighteen years, and I am of sound mind and competent to My name is Melody

Q

| make this declaration. I have personal knowledge of the facts stated in this declaration, and I declare unc penalty of perjury the following: |
|---|
| QUESTIONS |
| 1. Where and when did your abortion occur? Dayton OH 04/22/1985 |
| 2. How many weeks pregnant were you? 12 |
| 3. What type of abortion was performed? the cut up my baby and suction out the parts of it's body |
| 4. Were you adequately informed of the nature of abortion, what it is, what it does? ✓ Yes □ No |
| I knew abortion and procedure/s. While in high school I did a speech against abortion and research the information very thouroghly |
| 5. Were you adequately informed of the consequences of abortion? ☐ Yes ☑ No |
| NO!!!! I was NOT told that I could hear a piercing cry of a baby when there wasn't around. I went straight to work after the abortion and I was so sick and bled so much. They didn't tell me I wasn't allowed to go to work. I worked on my feet at the time. I wasn't told I would have night terrors about my child I killed. I had terrors of a small child crying in fear, I tried to get to "her" down a black tunnel and out hands never touched. I still hurt emotionally. I was diagnosed with PTSD two years ago my therapist. She told me this diagnose could be directly related to my abortion. I also female medical problems. I had endrametriosis, adnomyosis and extreme, unexplained scar tissue. These medical conditions forced me to have a hysterectomy or I would die. |
| 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 family |
| 9. How has abortion affected you? Yes since 1985. I have not been able to forgive myself for playing God and taking a life of my unborn child. Maybe this sounds sick, but I want/deserve for God to allow me to feel the physical pain I forced. |

my child to endure

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

In my family, most have never felt the same about me. They look and believe that I am and always will be "tainted" Which they are right.

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

Under NO circumstances have an abortion!! That baby that was conceived didn't not ask to be and has a right to life just like the two people who allow the baby to be conceived. No one has a right to take a life, that is God's decision. Having an abortion is a nightmare that you will carry with you for the rest of you life. Until God chooses to end your life. The female WILL have physical, emotional, and mental problems.

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

Why does the court have the right to give society to choose to murder another human? If they give society the right to end a baby's life, then why not give them the right to murder any human. The right to see someone on the street and decide they didn't like the way they look then they can shoot them and take their lives. Give the society the right to kill someone not matter the reason: if they were angry with them, stopped loving another, have envy towards or for not reason at all. Keeping abortion legal is absolutely NO different!!

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.

THE FOLLOWING PERSONAL INFORMATION IS KEPT CONFIDENTIAL BY THE JUSTICE FOUNDATION

You may contact me

The State of OH **County of Lucas** My name is Deborah . 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? Toledo OH 01//1974 2. How many weeks pregnant were you? 6 3. What type of abortion was performed? some kind of suction/aspiration 4. Were you adequately informed of the nature of abortion, what it is, what it does? ☐ Yes ☑ No. We were told what would happen procedure-wise. Never was the term "child" or "potential child" used. We were told: this is a blob of tissue. They offered to show me what they'd removed, but I was in so much pain, I could not sit up or dress myself. The nurse had to do this for me. Thankfully, I was never shown the aftermath of my abortion. I believe God spared me. 5. Were you adequately informed of the consequences of abortion? ☐ Yes ☑ No Never were the emotional ramifications mentioned. No warnings given that we would face depression, shame, guilt, grieving, or thoughts of suicide. No one informed of pain in next cycle. I had cramp in my uterus for 24 straight hours. Already experiencing deep shame about what I had done, I endured the pain alone & without meds. I developed intense endometriosis, resultingin several laproscopy surgeries and a total hysterectomy at age 49. All of these surgeries and medications cost us thousands of dollars. 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 \(\bar{\pi} \) No my husband

9. How has abortion affected you?

Overwhelming grief, guilt, shame and depression. A tormenting "secret." An always wondering: what our daughter would have looked like?...would have become?...what would she be doing with her life?

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

No one, but those few trusted individuals, really knew. I supposed indirectly my relationships were

affected because I became more of a "held back" person and was prone to depression. Perhaps I held ones "at arm's length" because I was afraid of closeness. It has deeply affected my relationship with my husband. There is a lack of connection and true intimacy. I have to believe it greatly affected our son. How different of person would he be today if he'd had his sibling? How might they have helped to "form" each other by their relationship? Instead, our son was an only child. Our true joy as a family, is that our Lydia Renee (Noble One Born Again) is alive in heaven and awaiting a reunion with all of us.

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

I would tell her that God doesn't consider any of us "an accident or a mistake." Because He gives mankind free choice, some people make unwise choices that result in the kind of intimacy that results in life being formed--because that's how He designed our ability to reproduce ourselves--through that physical act. But the conditions of our conception are not what determines our value in His eyes; they are not as important as the fact that life has been formed. I've told ones: God doesn't care about the conditions of your conception; He's just delighted that you are here--made in His image and imbued with passions and gifts and purpose especially by His hand." I would share these scriptures: Ps 139:13-18;Eph 2:10; Jer 29:11; Jer 1:4-5; Job 10:8,11,12; 31:15; 33:4; Eccl 11:5; Is 44:24; 49;1a,5,6; Ps 119:73 and Gal 1:13-15. I would encourage her to seek Godly wisdom on what is best for this child: keep him/her or bravely release this child into an adoptive home. And I would pray for her. I would encourage her to go to a pregancy crisis center and have an ultrasound and see for herself.

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

Most of what I've already shared above: my own experience is all I can really tell and the Truth of what the scriptures say. We all have a Plumb Line, a Standard, by which we form our values, and those values are reflected in our attitudes, words and actions. The courts may not agree with me, but the Truth of Scripture, as I've shared above, is my Plumb Line, my Foundation of Values by which I now live my life. They reveal to me the validity of life at conception; and that purpose, individual worth, and destiny is woven into each person, only awaiting the fullness of time to develop. Matthew speaks of the mercy and life- preservation attitude of Jesus when he said about Him: "A bruised reed He will not crush, and a flickering wick He will not snuff out." For us to cut off the fragility of a beginning life, for "convenience," is contrary to the nature of a life-creating God. I wish I had known of these truths before I'd made the dreadful choice to murder my own child. The repercussions will never fully go away.

PERSONAL INFORMATION

| "I declare under penalty | of perjury under the | laws of the Unit | ted States of Ame | erica that the fore | going is true |
|--------------------------|----------------------|------------------|-------------------|---------------------|---------------|
| and correct." | | | | | |

Executed this date: 3/7/2012 Please use my First Name

You may 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