

DECLARATION OF EVELYN SMITH

EVELYN SMITH hereby declares under penalty of perjury the following statements are true and correct:

1. I am the State Programs Coordinator for All-Options, Inc. (“All-Options”) – a nonprofit organization that promotes and provides unconditional, judgment-free support for people in their decisions, feelings, and experiences with pregnancy, parenting, adoption, and abortion.
2. All-Options has three primary program areas: the Talkline, Faith Aloud, and our Pregnancy Resource Center (“PRC”). The Talkline offers free peer counseling and support for people at any point during and after their pregnancies. Our Faith Aloud clergy counseling program offers nonjudgmental support and options counseling from clergy and religious counselors. Our PRC, based out of Bloomington, provides people across Indiana judgment-free and unbiased peer counseling, referrals to social service providers, and other resources. For example, the PRC provides parents free diapers and wipes, clothing, and toys.
3. The PRC also assists people in Indiana access abortion care. The PRC’s services include the Hoosier Abortion Fund that provides financial assistance to individuals seeking abortion care. The PRC also operates a Practical Support Network, which connects abortion patients with volunteers who drive them to and from their abortion appointments. The PRC serves clients from across the state.
4. As the State Programs Coordinator, I manage our programs that help people get abortion care, including the Hoosier Abortion Fund and Judicial Bypass Project. For the Hoosier Abortion Fund, I manage the intake process when a person calls seeking help getting an

abortion. As a part of this process, a team member collects information on the client and their needs, creates plans with the client for getting their abortion, and provides assistance for additional resources and care planning for those clients who were not able to get an abortion. I handle all the Judicial Bypass Project cases directly. When a minor calls our hotline seeking help in getting an abortion, I follow up with them to get a better understanding of their situation and provide them with resources they need to make their decision. If a caller is unable to get parental consent for their abortion, then I connect them with a lawyer who can help them file for a judicial bypass in court and help them with the logistics of getting care.

5. When a client calls the Hoosier Abortion Fund hotline, we conduct an assessment to determine what the client needs to obtain abortion care. Some of the details we collect include the client's gestational age; whether the client has transportation to get to and from their appointments; any financial hardships the client is facing; and whether the client is facing any threats to their safety. After the client has had their abortion, we follow up with them to see how everything went.
6. Since August 2019, the Hoosier Abortion Fund has served over 900 clients, including 30 minors. These clients live across the state of Indiana.
7. We launched the Practical Support Network as a part of the Hoosier Abortion Fund in 2019 to help facilitate rides for clients who did not have reliable transportation to get to and from their medical appointments. This program is currently paused because of the COVID-19 pandemic. Since October 2019, approximately 140 people have called seeking assistance with transportation to or from their abortion appointments. We have

only been able to provide transportation assistance to approximately half of the people who have called us seeking assistance.

8. We are the first and only statewide abortion fund and practical support network serving Hoosiers.
9. The Hoosier Abortion Fund currently operates on a weekly budget of approximately \$2,205. We give all of that money to people who need help funding their abortion. On average, the fund will pledge \$225 for people who are at ten weeks gestation and \$350 for people who are at thirteen weeks gestation. We are generally unable to cover the entire cost of an abortion procedure, and our clients have to find other ways to cover the rest of the cost of their care.
10. As a part of our process, we follow up with clients who received financial assistance from the fund to hear about their experience accessing abortion care. For clients who did not obtain an abortion, we find out what prevented them from accessing care. Usually, these clients tell us that they were unable to get an abortion due to the challenges associated with coordinating and paying for travel. These challenges are particularly burdensome because Indiana law requires patients to make multiple trips to the provider before they can obtain care. Unfortunately, many clients miss their appointments because they are unable to get to a provider.
11. Due to limited funding, the Hoosier Abortion Fund prioritizes people who are particularly vulnerable or facing especially challenging situations, such as minors, people who are struggling with homelessness, people who are experiencing intimate partner violence, and people with medical complications. We will also prioritize people that are at or near

thirteen weeks gestation, since they are approaching the gestational limit to obtain an abortion in Indiana.

12. All of the Hoosier Abortion Fund's clients cite the cost of care as a barrier to getting their abortion care.
13. Many of our clients are enrolled in a state health insurance program for lower income individuals, which I understand means they have limited financial resources. Many of our clients live paycheck-to-paycheck or struggle to meet their basic financial needs.
14. Sometimes our clients are forced to delay their care as they try to gather the necessary funds for their abortion. Our clients have to resort to various means to afford their procedures, including relying on friends or family for assistance. Sometimes clients experiencing intimate partner violence are forced to rely on their abusive partner to help pay for the procedure, which may entail placing themselves in an unsafe situation so they can get care. Often our clients do not have anyone in their networks they can rely on for financial assistance.
15. Many of our clients are low-wage workers who get paid by the hour. Our clients often do not get paid time off, which presents the additional burden of having to forgo much-needed wages when they need to take time from work. I have also helped clients who have faced retaliation from their employers when they have tried to take sick leave to obtain an abortion.
16. Travel is also often a barrier for our clients. Many clients struggle with traveling to and from their appointments. Indiana does not have reliable or available public transportation throughout the state. I regularly work with clients who do not have access to a reliable car. Even if clients have a car, they often struggle to pay for gas to travel to and from

their appointments. In addition, almost all of Indiana's abortion providers are located in the state's metropolitan areas. For clients who do not live in Indianapolis, traveling presents a substantial barrier to accessing abortion care. Through my work managing the Hoosier Abortion Fund and speaking to clients, I have seen how a lack of transportation imposes heightened emotional and mental challenges on clients who are already going through a difficult experience. Sometimes when a client is struggling with gas money, we increase our pledge amount so clients can use their resources to pay for gas as opposed to covering the additional cost of the procedure

17. For some of our clients who do not have a reliable form of transportation, finding someone in their network to drive them to and from their appointments is not an option. Often, the people in their networks are unable to take time off from work or have childcare responsibilities that prevent them from providing assistance. Other times our clients cannot disclose to people in their networks that they need help getting abortion care because no one in their network supports their decision. I know of several clients who have had to reschedule appointments because their transportation fell through and had no other way of getting to a provider.
18. Most of our clients are already parents. Finding childcare coverage for a medical appointment is difficult. Finding coverage for two appointments is even more difficult. Our clients typically have to find childcare for at least two days given Indiana's 18-hour waiting period requirement. Many of them cannot afford to pay for a babysitter and leaning on friends or family for childcare often forces them to disclose their abortion when they do not want to. I have worked with many clients who have had to delay their abortion appointments because they cannot secure affordable or reliable childcare.

19. It is common for people we help to miss their appointment because they could not overcome the transportation, childcare, employment, or financial hurdles to get there. Sometimes clients' childcare falls through, their car breaks down, or they are unable to get time off from work. When clients have to reschedule their appointments, it means they have to endure an unwanted pregnancy for a longer period of time. The delay increases their stress and anxiety.
20. Currently in Indiana, people do not have access to abortion care after fourteen weeks of pregnancy. As a result, clients who need an abortion past fourteen weeks gestation must go to another state to obtain care. Unfortunately, this is very common for the clients we serve. Since October 2019, about a quarter of our clients – nearly 300 people – have had to travel out-of-state to obtain abortion care because they were past Indiana's gestational limit to obtain an abortion and could not access a second trimester abortion in the state.
21. Traveling between states exacerbates the challenges clients face in getting abortion care. Our clients often have to take additional time off work to travel out of state, resulting in greater lost wages. Some clients have been fired for needing to take off too many days for their appointments. Clients often have to rely on a friend or family member for transportation to a neighboring state, forcing them to disclose their abortion. In addition, they often have to arrange and pay for lodging in another state and secure childcare for multiple days. Sometimes our clients cannot overcome these burdens and are unable to get out of state for their abortion care.
22. I regularly work with clients who cannot access abortion care before fifteen weeks of pregnancy. Some clients, especially young people, do not know they are pregnant until after fifteen weeks. For clients who are struggling with poverty, coming up with enough

funds, even with the help of the Hoosier Abortion Fund, or finding reliable transportation to travel long distances causes them to delay their care past fifteen weeks.

Dated: September 17, 2021

DocuSigned by:
Evelyn Smith
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EVELYN SMITH