

DECLARATION OF MEGUMI RIERSON

MEGUMI RIERSON hereby declares under penalty of perjury that the following statements are true and correct:

1. I am the Communications Manager at Our Justice. I work closely with the organization's Board of Directors, volunteers, and funding recipients, including in providing support to people seeking abortion care. I also coordinate with other organizations that provide financial assistance and practical support, such as help with lodging and transportation, to Minnesota residents seeking abortion care.

2. I also previously volunteered as an abortion clinic escort, guiding patients into abortion clinics and providing them emotional support as they were forced to walk by screaming anti-abortion activists on their way into the clinic to receive their abortion care. Unfortunately, I have not served in that capacity since March, 2021, as a direct result of anti-abortion activists' increasingly intimidating harassment tactics, including an incident that left me fearing for my physical safety.

3. Formerly known as Pro-Choice Resources, Our Justice is a Minnesota nonprofit corporation that was founded in 1967 by a group of doctors, clergy, and community members. Our mission is to ensure that all people and communities have the power and resources to make sexual and reproductive health decisions with self-determination. For decades, Our Justice has operated an Abortion Assistance Fund that provides financial assistance and resources to people seeking abortion care who cannot afford the cost of care. In addition to providing funds to help pay for the cost of abortion care, Our Justice provides lodging and transportation stipends to people seeking abortion care.

4. Our Justice operates under a reproductive justice framework, which means that we work to ensure that people and communities have the economic, social, and political power and resources to make healthy decisions about their bodies, sexuality, and reproduction. Reproductive justice includes the right to have children, to not have children, and to parent the children we have in safe and healthy environments. We understand that abortion may be just one part of a person's reproductive justice journey.

5. Our Justice considers the individual needs and circumstances of each person seeking our assistance when determining how to assist them and how much money we can pledge towards their abortion care. The factors we assess include, among other things: the gestational age of their pregnancy; the cost of their procedure; the amount of financial support they need; whether they have insurance coverage or are eligible for Medical Assistance; whether they are receiving financial support from other sources; whether they are a minor seeking judicial bypass; and whether they have reported that they are experiencing other challenging circumstances, such as having a high-risk pregnancy, experiencing homelessness, experiencing sexual or intimate partner violence, experiencing severe financial hardship, or experiencing hardship due to their immigration status. We then communicate with each person seeking care to discuss how and to what extent we can support them. These communications are individualized and confidential.

6. We assist adults and adolescents seeking abortions. Most people seeking assistance from Our Justice have low incomes. Some are students. Most are already parents. Many live far from abortion providers and must travel multiple hours each way to access care. We assist Minnesotans as well as residents of other states, especially people from across the upper Midwest who seek abortion care in Minnesota because it is even less accessible in their state of residence. Unfortunately, abortion providers are scarce in Minnesota. Most are concentrated in metropolitan

areas, particularly the Twin Cities region. In fact, eighty-two of Minnesota's eighty-seven counties do not have an abortion provider.

7. The people Our Justice serves cannot afford abortion care without financial assistance. Some of the people we fund have private health insurance but still require financial assistance because their plans do not cover abortion, cover abortion only in limited circumstances, or impose high out-of-pocket costs. Other people we assist are enrolled in Medical Assistance but have difficulty navigating the program; we make sure they have the information they need to get coverage. In addition, some of our funding recipients are afraid to use their health insurance or Medical Assistance because doing so would make it impossible for them to keep their abortion care confidential. This is an especially significant barrier for people experiencing intimate partner violence, young people with abusive parents, and other people in abusive relationships.

8. The high cost of abortion in Minnesota adds to these financial burdens. First trimester abortions in Minnesota cost at least \$700. Second trimester abortions start at \$800 and can go up to \$2,000 or more. In 2020, we provided an average of \$295 for each person seeking financial support for their abortion care, with an average pledge between \$150 and \$200 for a first trimester abortion and between \$300 and \$500 for a second trimester abortion. We sometimes provide larger pledges for funding recipients facing especially challenging circumstances. In 2019, our largest pledge amount to a single caller was \$1,075; in 2020, with the onset of the COVID-19 pandemic, the single largest pledge amount was \$3,000.

9. Because Our Justice is not able to fund the full cost of abortion care, our funding recipients often have to aggregate funding from different sources to pay for their procedures. This process is time consuming and emotionally draining for many of the people with whom we work. And of course, the more expensive an abortion is, the harder it is for people to gather the necessary

funds, and the longer they are delayed in obtaining care. Sometimes this pushes callers beyond fifteen weeks of pregnancy, measured from the first day of their last menstrual period (“lmp”).

10. Our Justice funds many people who also require assistance with travel and lodging. When we started the Abortion Assistance Lodging program, we intended to place people in need of lodging at the homes of volunteers. Because of the COVID-19 pandemic, and in consideration of the safety of both our volunteers and the lodging recipients, we now provide funds to pay for accommodation at hotels, although we are only able to offer this service to people seeking abortion care in Minnesota. We also provide our lodging program recipients with a transportation stipend or connect them to other organizations for rides and travel support.

11. Other challenges people face in accessing abortion care include the need for childcare and the need to take time off from work or school. The longer someone is away from home, the harder it can be for them to secure and pay for childcare. In addition, the longer someone is away from home, the harder and more stressful it can be to keep their whereabouts—and thus their pregnancy and abortion—confidential, including from their employers or abusive partners. Being forced to take multiple days off from work to travel to obtain abortion care can also jeopardize their employment. For some people, the inability to keep their pregnancy and abortion confidential can lead to increased risk of abuse or violence. Those who must take time off school also face logistical difficulties.

12. Our Justice also assists minors, who face a unique challenge in accessing abortion care in Minnesota. Minnesota requires abortion providers to notify both of the minor’s parents and observe a 48-hour waiting period before providing an abortion. Alternatively, minors may seek permission from a court to obtain abortion care without parental notification (“judicial bypass”). Minors who seek judicial bypass often have abusive or unsupportive parents. Young people who

are forced to go through the judicial bypass process face the additional burdens of having to navigate an unfamiliar and difficult legal system in order to access abortion care, which delays access to care and also increases stress and anxiety. The judicial bypass process also creates additional logistical challenges for minor who must take time off school, a task that can make confidentiality nearly impossible.

13. Many people seeking abortion care also experience stigma and must navigate a sea of misinformation. The various abortion restrictions and logistical hurdles people must endure in search of their abortion care often makes people feel like they are doing something wrong. In addition to this internalized stigma, it can be difficult to access emotional or logistical support. Our Justice sometimes receives requests for support from people who have been misled and delayed in accessing their abortion care by a crisis pregnancy center (“CPC”), fake health centers that pretend to offer support but serve only to stigmatize and mislead people in the hopes of delaying their access to abortion care. There are ninety-three of these CPCs in Minnesota, and their reach is expansive. Many CPCs occupy buildings adjacent to abortion clinics and cultivate an online presence that mimics abortion clinics, both in hopes of attracting people who seek abortion care.

14. Unfortunately, people seeking abortion care must also face violent harassment and intimidation tactics as they arrive at the clinic for their care. In my time as a volunteer clinic escort, I have helped patients navigate a sea of “protestors” who yell and scream hateful expletives and misogynistic insults, wave around infant diapers and onesie pajamas while implying the patient is a murderer, yell religiously based threats about the consequences of acting against god, and force misinformation and pseudoscience about so-called “abortion reversal” onto patients. One abortion clinic routinely faced an environment that was so overwhelming that it decided to erect a fence to provide its patients some privacy on their walk from the parking lot into the clinic. Not content to

be shut out, the anti-abortion ministry that had occupied the building next door decided to erect a deer stand from which they could continue their yelling and harassment of patients trying to access care. At another abortion clinic, anti-abortion activists line the sidewalk leading to the building entrance on the days the clinic provides abortion care. They also routinely trespass onto outdoor clinic property, using makeshift megaphones to yell religious condemnations into the clinic for the entirety of the day.

15. These tactics are not only humiliating and demeaning; they are also violent and scary. I was forced to suspend my volunteer role because I feared for my safety. People seeking abortion care do not have that choice. They must endure this harassment, intimidation, and violence if they want to access care. And those whose abortion care requires more than one visit to the clinic must likewise face this treatment more than once. After their first appointment, patients know what awaits them for subsequent visits. This may cause patients additional stress, stigma, and shame. Some patients may delay their abortion care as a result.

16. All of these barriers often delay access to necessary abortion care. Additionally, Minnesota requires people seeking abortion care to delay receiving care for at least twenty-four hours after receiving certain state-mandated disclosures.

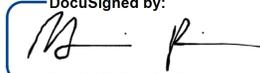
17. Delaying care is harmful because it forces people to stay pregnant when they do not want to be, forcing them to deal with the physical symptoms of pregnancy longer and increasing their stress and anxiety. For some of the people we assist, delays make it more difficult to hide their pregnancy from an abusive partner or navigate an unsafe situation at home. Delays can be especially harmful for pregnant people who need abortion care after fifteen weeks because, after the first trimester, the cost of an abortion procedure increases significantly with each passing week. In addition, there are fewer physicians available to provide abortion care for patients after

sixteen weeks, so delay can make it even harder to find a provider. Delays that push callers further into their pregnancy not only necessitate driving longer distances to one of the very few abortion providers who can perform the necessary procedure, they also complicate the logistics of coordinating childcare and taking time off work or school.

18. The challenges to accessing abortion care have increased with the COVID-19 pandemic. As a result of COVID-19, many of our funding recipients are struggling with loss of work, reduced income or loss of income, loss of employer-sponsored health insurance, and increased childcare needs and burdens. Because of COVID-19, many people seeking support from Our Justice have increased financial needs. Our requests for funding increased 90% from 2019 to 2020. The ongoing COVID-19 pandemic also makes travel more difficult, stressful, and dangerous because of the risk of contracting COVID-19. As a result, Our Justice has found that people seeking abortion care who lack a reliable car have even greater difficulty finding someone in their network to drive them to appointments.

19. A 15-week abortion ban would compound all these barriers our callers already face when seeking abortion care. For some, it would push legal abortion care out of reach entirely.

Dated: September 20, 2021

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