

DECLARATION OF KAMYON CONNER

KAMYON CONNER hereby declares under penalty of perjury the following statements are true and correct:

1. I am the Executive Director of the Texas Equal Access Fund (“TEA Fund”) a nonprofit corporation incorporated under Texas law and based in Dallas, that provides financial and emotional support for low-income abortion patients in northern Texas. Our mission is to foster reproductive justice, which includes removing barriers to abortion access through community education.

2. My primary responsibilities as Executive Director are working with our Board of Directors to help ensure the implementation of our mission; managing our budget and fundraising; and overseeing our programmatic work, including supervising staff and volunteers.

3. I have provided services at TEA Fund for nearly fifteen years, first as a volunteer fielding calls to our Helpline, and then as a Board Member and Intake Coordinator. In the latter roles, I helped shape the mission and strategies of the organization based on our clients’ experiences.

4. TEA Fund has seven staff members and over 125 volunteers. We primarily serve people living in northern Texas. In 2020, our Helpline received over 10,500 calls from Texans seeking help paying for an abortion. Most of our callers are referred by abortion providers in the state. The calls came from 110 counties in Texas, many of them rural. Seventy percent of the callers were Black, indigenous, or people of color. Indeed, the majority of Texas abortion patients are Black or Latinx, communities that already face inequities in access to proper and compassionate medical care due to systemic racism and a history of reproductive oppression.

5. All of TEA Fund's clients are low-income and many are already parents. The majority of TEA Fund's clients have no insurance at all or have Medicaid or Medicare, which do not provide coverage for abortions. Some have private insurance that excludes coverage for abortions.

6. A Helpline caller can qualify for assistance based on their financial circumstances, the amount of financial aid they have been able to obtain from other sources, and the cost of their abortion care. If TEA Fund can provide support, TEA Fund sends a financial voucher to the abortion provider with whom the caller's appointment is scheduled and pays the provider after the abortion is completed. The average amount for a voucher is \$330 and varies based on gestational age.

7. In 2020, TEA Fund provided over \$400,218 to assist 1,218 Texans in obtaining abortions. Unfortunately, budgetary constraints prevent us from providing funding for every caller who needs it, and from covering the full cost of the abortion for those callers we can help. In 2020, we were unable to provide any financial assistance at all to three-quarters of the people who requested it.

8. Many of our clients obtain their abortions in the first trimester. However, we serve a significant number of people who need abortions in the second trimester, including after fifteen weeks gestation. For instance, from January 1, 2021 to August 1, 2021, TEA Fund provided funding for 165 abortions where clients were at least fifteen weeks pregnant.

9. To help address clients' other needs, such as transportation, lodging, and meals, we coordinate with organizations offering practical support for obtaining an abortion. TEA Fund has a social worker who follows up with clients soon after their scheduled abortion appointment. Each year, we learn that some clients never made it to their abortion provider because they were unable

to afford travel and other expenses even with our contribution towards the cost of the abortion itself.

10. In 2020, TEA Fund introduced a text line that provides information about where to get an abortion, how to get help paying for care, and how to connect to practical support networks. TEA Fund also has a virtual Client Companion Program, through which volunteers provide emotional support to abortion patients during their abortion procedure. TEA Fund's Caller Engagement Program organizes people throughout Texas to advocate for meaningful abortion access.

11. TEA Fund provides these services to people seeking abortion care in Texas to express and effectuate our deeply held belief that abortion is a fundamental part of healthcare and that restrictions on abortion access discriminate against people with low incomes, young people, people in rural areas, and people of color.

Barriers Facing TEA Fund's Clients

12. TEA Fund's clients face significant barriers to abortion access. These barriers can delay clients' care, make their care more expensive, and in some cases, prevent them from obtaining abortion care entirely.

13. Financial obstacles are a major barrier for TEA Fund's clients. Without insurance coverage, paying for abortion care can be a significant financial hardship, and our clients often struggle to come up with funding for their abortion care even with TEA Fund's assistance. Having to find funding for their abortion care can delay clients for weeks and can be overwhelming.

14. In addition to steep financial obstacles, our clients face other logistical challenges to obtaining abortion care. Many have inflexible jobs that do not provide paid time off. Some of our clients fear they will lose their jobs if they take time off for their abortion care. Many of our

clients who are already parents struggle to find reliable childcare. Others struggle with finding transportation, and may not have a reliable ride, car, or sufficient gas money. And even if clients can find a car and enough gas money, a lack of car insurance or an out-of-date license can pose additional barriers. For clients from immigrant or migrant communities, the risk of immigration enforcement compounds existing transportation challenges.

15. Our clients who are young people face unique and often insurmountable barriers to accessing abortion care, which lead to additional delays. They may not know that they are pregnant at first, and may be scared to tell their parents or reach out for support when they do find out. For this reason, it can take some time for young people to reach out to TEA Fund or, as sometimes happens, for their parents to reach out on their behalf. When a young person is unable to obtain parental consent, they must go through the judicial bypass process, which can further delay their care.

16. Our clients who are disabled face other obstacles to obtaining abortion care. For instance, finding accessible transportation and ensuring they can obtain care in a clinic that is accessible and accommodating can pose additional burdens.

17. Additionally, some of our clients are misled into first seeking care at a crisis pregnancy center. By the time they realize that they cannot get their abortion at the crisis pregnancy center, they are already pushed later into their pregnancy. Some of our clients are told misinformation about their gestational age from crisis pregnancy centers, which can cause further confusion and delay. For instance, one of our clients was told by a crisis pregnancy center that she was six weeks pregnant when she was actually ten weeks pregnant.

18. Finally, many of our clients face barriers to abortion access, including heightened financial and logistical barriers, attributable to systemic racism. For example, when our Black and

Latinx clients drive long distances to access abortion care, they are at higher risk of being pulled over by the police.

19. Because of the many barriers to care that they face, many of our clients are not able to obtain abortions before fifteen weeks of pregnancy.

20. If our clients miss the window where abortion may be provided in Texas, many are not able to travel out of state to obtain an abortion. This is because traveling out of state magnifies the barriers that already exist, and poses additional logistical challenges, including requiring clients to raise additional money for transportation and lodging, as well as obtaining sufficient time off from work and finding reliable childcare for a longer period of time. In addition, some of our clients, such as those who are undocumented, may not be able to leave the state at all.

Impact of Abortion Bans on TEA Fund's Clients

21. I am aware of the impact of abortion bans on TEA Fund's clients because Texas recently banned the provision of abortion care after six weeks. Since the ban went into effect, many of our clients have not been able to get care at all. Other clients have experienced lengthy delays in order to get care out of state. In addition to the delays caused by the financial and logistical challenges of traveling out of state, our clients are finding that abortion clinics in states bordering Texas are booked up for weeks at a time.

22. This is not the first time that TEA Fund's clients have struggled to access care after Texas effectively banned abortions. Texas further curtailed abortion access at the start of the COVID-19 pandemic last year. Our clients faced long wait times for an appointment and often traveled long distances out of state to reach a provider legally authorized to perform abortions. The resulting financial burdens, including more expensive procedures due to the later gestational age of the pregnancies, made it even more difficult for clients to meet the costs associated with out-of-

state travel. We coordinated with abortion funds in New Mexico to provide food and other resources to Texans traveling to a provider there. Despite our best efforts, several Texans were unable to leave the state and forced to carry their pregnancies to term.

23. I know from these experiences that abortion bans force many of our clients to carry their unwanted pregnancies to term. This can be traumatic and devastating for our clients who do not want to be pregnant. Our clients are making the decision to have an abortion with their families in mind; their inability to get an abortion deprives them of the ability to control their lives and impacts their families and their futures.

Dated: September 21, 2021

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KAMYON CONNER