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No. 24AP330-OA

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## In the Supreme Court of Wisconsin

PLANNED PARENTHOOD OF WISCONSIN, on behalf of itself, its employees, and its patients, KATHY KING, M.D., ALLISON LINTON, M.D., M.P.H., on behalf of themselves and their patients, MARIA L., JENNIFER S., LESLIE K., and ANAIS L., PETITIONERS,

*v.*

JOEL URMANSKI, in his official capacity as District Attorney for Sheboygan County, Wisconsin, ISMAEL R. OZANNE, in his official capacity as District Attorney for Dane County, Wisconsin and JOHN T. CHISHOLM, in his official capacity as District Attorney for Milwaukee County, Wisconsin, RESPONDENTS.

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### AFFIDAVIT OF HEATHER WEININGER

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STATE OF WISCONSIN )  
  ) SS  
MILWAUKEE COUNTY )

I, Heather Weinger, being duly sworn, state as follows:

1. I am the Executive Director of Wisconsin Right to Life, Inc. (WRTL).
2. I am the person within WRTL that is most knowledgeable about the matters set forth herein.
3. WRTL is a proposed intervenor in the above-captioned action.
4. Founded in 1968, WRTL is a nonprofit, membership-based, pro-life advocacy organization headquartered in Milwaukee, WI.
5. WRTL believes that every human life is inherently valuable from fertilization to natural death.

6. WRTL exists to protect the unborn as much as possible.

7. WRTL seeks to make abortion an unthinkable solution to human problems, and a key part of WRTL's mission is to save lives by promoting and providing positive alternatives to abortion.

8. WRTL expends substantial financial resources to ensure that abortion alternatives are available in Wisconsin, and that the general public is aware of them and able to access them.

9. WRTL also expends substantial financial resources to inform the public of the dangers and harms of abortion, with a goal of hoping to persuade pregnant women who are considering abortion not to abort their child, but to choose life instead.

10. WRTL currently invests in educational resources on the realities of abortion and alternatives to abortion on platforms such as Veritas Society and Teenbreaks.com.

11. In addition, WRTL helps women who have had abortions find and receive recovery services.

12. WRTL also provides emergency grants to pregnancy center patients who need financial assistance. These grants can be used for needs like car repairs, child care, housing, heat, and electric bills.

13. WRTL is concerned that constitutionalizing abortion will significantly increase the number of women considering and seeking abortions in Wisconsin. Such a ruling will result in the loss of countless more unborn Wisconsin children and

require WRTL to significantly increase its financial expenditures to ensure that the public remains informed about abortion alternatives, and that these alternatives remain available and accessible to all.

14. Constitutionalizing abortion will also require WRTL to significantly increase its efforts to inform the public about the dangers and harms of abortion and to hopefully persuade women considering abortion to choose life instead.

15. WRTL is also concerned about the effect that constitutionalizing abortion will have on the abortion-related statutory requirements that are currently in place. If abortion is constitutionalized, there will be immediate confusion as to whether and how these statutory requirements apply.


16. Furthermore, if abortion is constitutionalized, WRTL will be required to significantly increase its financial expenditures to defend Wisconsin's current abortion-related laws and to continue providing the public with information and access to abortion alternatives.

17. Some of the currently-in-place laws Wisconsin Right to Life has supported, and will defend if abortion is constitutionalized, include the ultrasound requirement (2013 WI Act 37), the Safe Haven for Newborns Act (enacted in 2001 and expanded in 2023), and the law that prevents taxpayer-funded abortion through state employees' health plans (2017 WI Act 191).

Dated: April 25, 2024.

  
HEATHER WEINGER

Subscribed and sworn to before me  
this 25 day of April, 2024.

  
Notary Public, State of Wisconsin  
My Commission expires 9/12/2027.

