

No. 24AP330-OA

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.

AFFIDAVIT OF CHRISTINE FILE

STATE OF WISCONSIN)
) SS
DANE COUNTY)

I, Christine File, being duly sworn, state as follows:

- I am the President of Wisconsin Family Action (WFA).
- I am the person within WFA that is most knowledgeable about the matters set forth herein.
- WFA is a proposed intervenor in the above-captioned action.
- Founded in 2006, WFA is a nonprofit, pro-life advocacy organization headquartered in Madison, WI.
- WFA supports the sanctity of human life and pro-life efforts to protect the unborn.

6. WFA exists, in part, to protect the unborn as much as possible.

7. WFA opposes legislation that promotes the destruction of human life through abortion and other means.

8. WFA also supports the right to learn about the realities of abortion, including fetal pain.

9. WFA expends substantial time and financial resources educating the public about the dangers and harms of abortion and the alternatives to abortion, with the hope of persuading pregnant women who are considering abortion not to abort their child, but to choose life instead.

10. WFA currently provides educational resources on abortion and abortion alternatives through blog posts (Wisconsin Family Voice), whitepapers, radio broadcasts, TV broadcasts, WFA's weekly newsletter and emails, press releases, social media content, and speaking engagements. WFA's robust communication informs citizens on current issues and legislation around its missional issues, including life, and invites all to partner with WFA to defend human life at all stages.

11. WFA has a Legislative & Policy Director that oversees and tracks bills in the Wisconsin Assembly and Senate that seek to legislate on the life issue. WFA will vocally support or oppose legislative efforts depending upon their language around life. WFA will lobby and ally with other pro-life organizations to protect life.

12. WFA 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 WFA 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.

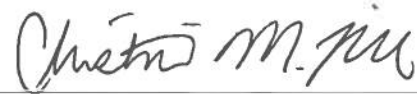
13. Constitutionalizing abortion will also require WFA to significantly increase its efforts to inform the public about the dangers and harms of abortion and to hopefully persuade women considering abortion to choose life instead.

14. WFA 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.

15. Furthermore, if abortion is constitutionalized, WFA 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.

16. Some of the currently-in-place laws WFA has supported, and will defend if abortion is constitutionalized, include ensuring voluntary consent (2011 WI Act 217), the 20-week ban based on fetal pain (2015 WI Act 56), 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 23, 2024.



CHRISTINE M. FILE

Subscribed and sworn to before me
this 23rd day of April, 2024.



Notary Public, State of Wisconsin
My Commission expires 10/28/2024

