

FILED

04-25-2024

CLERK OF WISCONSIN

SUPREME COURT

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,

U.

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 DAN MILLER

STATE OF WISCONSIN)
) SS
WAUKESHA COUNTY)

I, Dan Miller, being duly sworn, state as follows:

1. I am the State Director of Pro-Life Wisconsin.
2. I am the person within Pro-Life Wisconsin that is most knowledgeable about the matters set forth herein.
3. Pro-Life Wisconsin is a proposed intervenor in the above-captioned action.
4. Founded in 1992, Pro-Life Wisconsin is a nonprofit, pro-life advocacy organization that is headquartered in Brookfield, WI.

5. Pro-Life Wisconsin believes that the right to life exists from the moment of conception and extends until natural death.

6. Pro-Life Wisconsin seeks to protect all unborn life, and to achieve this objective, Pro-Life Wisconsin educates the public and lobbies elected officials.

7. Pro-Life Wisconsin invests substantial financial resources to educate the public about the realities of abortion, and to lobby for increased protection of the unborn at the legislative level.

8. Pro-Life Wisconsin also 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.

9. Pro-Life Wisconsin currently provides educational resources on abortion and abortion alternatives through media, seminars, webinars, and social media. We also provide educational information at abortion centers in the public right of way.

10. Pro-Life Wisconsin 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 Pro-Life Wisconsin 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.

11. Constitutionalizing abortion will also require Pro-Life Wisconsin 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.

12. Pro-Life Wisconsin 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.

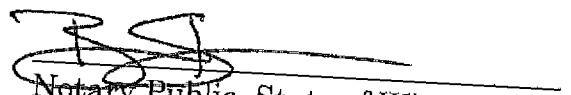
13. Furthermore, if abortion is constitutionalized, Pro-Life Wisconsin will be required to significantly increase its financial expenditures to defend Wisconsin's current abortion-related laws and to continue providing the public with information and access to abortion alternatives.

14. Some of the currently-in-place laws Pro-Life Wisconsin 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 23, 2024.


DAN MILLER

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


Notary Public, State of Wisconsin
My Commission expires 10/10/2027.

