

No. 21-588

In The
Supreme Court of the United States

—◆—
UNITED STATES OF AMERICA,

Petitioner,

v.

THE STATE OF TEXAS, ET AL.,

Respondents.

—◆—

**On Writ Of Certiorari Before Judgment
To The United States Court Of Appeals
For The Fifth Circuit**

—◆—

**AMICUS CURIAE BRIEF OF
410 TEXAS WOMEN INJURED BY ABORTION,
MELISSA OHDEN AND ABORTION SURVIVORS
NETWORK, AND CREATED EQUAL
IN SUPPORT OF THE STATE OF TEXAS, ET AL.**

—◆—

ALLAN E. PARKER
Counsel of Record
for Amici Curiae
R. CLAYTON TROTTER
MARY J. BROWNING
THE JUSTICE FOUNDATION
8023 Vantage Dr., Suite 1275
San Antonio, TX 78230
(210) 614-7157
aparker@txjf.org

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INTEREST OF *AMICI CURIAE*¹
***AMICI* 410 TEXAS WOMEN**
INJURED BY ABORTION

Amici Curiae 410 Texas Women Injured by Abortion have suffered “devastating psychological injuries”, *Planned Parenthood v. Casey*, 505 U.S. 833, 882 (1992) (hereafter *Casey*), as a result of their abortions. They desire to see other women saved from such injuries, especially since the Texas Safe Haven law is now available to women in any situation, which prevents irreparable injury to women.

Amici Curiae file this brief to assist this Court with information it needs to assess whether women are actually irreparably harmed by S.B. 8, the Texas Heartbeat Bill, whether enjoining the law is in the public interest, and where does the balance of equities lie? The many complex and novel jurisdictional issues are extensively briefed by other parties. *Amici* have special insight and experience relevant to the issue of balancing the equities. *Amici* can demonstrate irrefutably that if the law is preliminarily enjoined many, many women will be irreparably injured with “devastating psychological injuries,” as this Court has recognized in *Casey* at 882. “Infant life” (per *Gonzales* at 160) will be terminated and bloodily destroyed which can never be made whole.

¹ Consent for this Brief was given by all parties. No party contributed to the writing or financing of the brief. No person other than *amici curiae*, its members, or its counsel made a monetary contribution to its preparation or submission.

Amici 410 Texas Women Injured by Abortion² are women who were injured by their own abortions and the actions of their abortionists. Most of the *Amici* Women Injured by Abortion suffered grievous psychological injuries, but some suffered severe physical complications as well. All were exposed to the risk of serious physical injury, as well as serious psychological injuries,³ and thus have a profound interest in protecting other women from such injuries. All of the *Amici* 410 Texas Women have personally experienced abortion in actual practice, not just theory. They have suffered, in many cases, decades of “devastating psychological consequences” as this Court noted abortion causes some women in *Planned Parenthood of Southeastern Pa. v. Casey*, 505 U.S. 833, at 882 (1992).

² Attached as Appendix A is the list of the initials, first names, or full names of the Texas *Amici Curiae* Women. In order to protect their identities, some of the women have requested that we use initials only or first name only. These women’s sworn affidavits or declarations made under penalty of perjury are on file at The Justice Foundation. Protecting the identity of women who have had abortions or seek abortions has been customary since *Roe v. Wade*, 410 U.S. 113 (1973) and *Doe v. Bolton*, 410 U.S. 179 (1973) in which *Roe* and *Doe* both were pseudonyms. A few of the women have included the names of the children they aborted in order to honor their memory.

³ *See, e.g.*, “Women who had undergone an abortion experienced an 81% increased risk of mental health problems, and nearly 10% of the incidence of mental health problems was shown to be attributable to abortion.” *See* Coleman, Priscilla, “Abortion and Mental Health: Quantitative Synthesis and Analysis of Research Published 1995-2009,” *The British Journal of Psychiatry* (2011) 199, 180-186, DOI: 10.1192/bjp.bp.110.077230 (A meta-analysis of 22 studies).

Amici Women have experienced first-hand, some multiple times, the callous reality of the abortion industry. They and the vast majority of women who go to high volume abortion facilities are treated as business assets or customers, not as patients. Therefore, the word “patient” will not be used in this Brief because there is no real doctor/patient relationship in most abortion facilities, only the technical or legal fiction of a doctor/patient relationship. It is standard practice in Texas for a woman to not even see her abortionist until she has paid her money and is prepped for the abortion. Texas women who have experienced abortion have suffered devastating effects from the lies of the abortion industry. Their experience can help this Court avoid irreparable injury to thousands upon thousands of Texas women.⁴

**AMICI MELISSA OHDEN AND
ABORTION SURVIVORS NETWORK**

Abortion Survivors have a vested interest in the Court’s position in this case as they owe their very lives

⁴ Here are the written affidavits or declarations under penalty of perjury of the 410 Texas Amici Women Hurt By Abortion: https://www.dropbox.com/sh/o2z2o9doxn3h0q5/AABHjkv-Pwvse df5Rs_emo3ga?dl=0 These testimonies were collected by Operation Outcry, a project of The Justice Foundation, beginning in 2000 on behalf of Norma McCorvey (the former “Roe” of *Roe v. Wade*) and Sandra Cano (the former “Doe” of *Doe v. Bolton*) as they filed Rule 60 Motions in their efforts to reverse their own landmark cases.

See also 4,728 Testimonies of Women Hurt By Abortion, https://www.dropbox.com/sh/p2fi4taxmrbivyz/AAAP_aenldXwXb34Ktcq_X8la?dl=0

to having been born alive, by accident – the products of failed abortion attempts. These *Amici*, many of whom are women, some are men; as all can speak to the devastation and irreparable harm to the child in the womb, weighing in on whether the Court should stay the Texas law from going into effect, even in the short run. Much is said about the harm to the pregnant woman, who finds the pregnancy inconvenient or unwanted. Voices that have not yet been adequately heard in this arena are the voices of the persons who have survived abortion attempts. Abortion is the intentional act to “terminate the pregnancy” and end their lives. *Amici* Survivors of Abortion are not just so-called “products of conception,” as the abortion industry calls them, they are living persons.

Melissa Ohden, an abortion survivor herself, has a Masters in Social Work and is the founder and executive director of the Abortion Survivors Network. Melissa is the survivor of a failed saline infusion abortion at approximately 31 weeks gestation, in 1977. Melissa’s medical records state, “a saline infusion for an abortion was done but was unsuccessful.” Her records also state a “complication of pregnancy” as a “saline infusion.” As an adoptee, Melissa has now been united with her birthmother, who was forced to abort her and who didn’t know for over 30 years that Melissa had survived.

Abortion is a crime against humanity. Abortion survivors are the intended victims of abortion who have lived to tell the story of how inhumane abortion is. They’ve lived to share how abortion set out to take

their life and left them with physical, emotional, social, mental, and spiritual sufferings. Abortion survivors' basic right to life were denied. They deserve to be seen and heard in our culture and by the Court as they consider abortion jurisprudence.

The Mission of Abortion Survivors Network is: To create a world where the incidence of failed abortions and the lives of survivors are openly discussed and accepted, survivors and their families are healed, empowered and equipped, and abortion is unthinkable. The Vision of Abortion Survivors Network is: A world where every human being is seen as more than a choice.

The Abortion Survivors Network, a non-profit corporation since 2019, operated without formal non-profit designation from 2012. The Network includes 10 who live in Texas and 403 persons nationwide. These survivors know first-hand the devastating consequences of having been thought of as a “choice” and been rejected. Their births were not celebrated. They did not have a “birthday”. They were accidents – intended for death through abortion – but surviving. They had a “survival day.”

Dr. Willard Cates, Chief of Abortion Surveillance of the Center for Disease Control was quoted by authors Jeffries and Edmonds in “The Dreaded Complication of Abortion,”⁵ as having estimated 400-500 live births after abortion occur annually. Since 1973, that

⁵ The “Dreaded Complication of Abortion,” <https://www.kinston.com/opinion/20190402/norman-dreaded-abortion-complication>

would account for between 19,200 and 24,000 “accidental” births from attempted abortions since *Roe v. Wade*.⁶

The voices of these *Amici* speak directly to the issue of “the other” life in the balance of equities before this Court. Up to this point, the legal light has been focused primarily on the rights of the pregnant woman. There are two lives at issue in every abortion, not one. This Court has already recognized the State’s interest in protecting the life of the child in the womb, at some point.

Amici Survivors of Abortion have experienced and are in a position to directly convey the common signs of trauma shared by many survivors: loss of limbs, cerebral palsy, chronic fatigue, chronic pain, immuno-deficiency issues, and insomnia, among others. Common emotional, mental or social difficulties include: low self-worth, rejection, shame, eating disorders, general fearfulness, and challenges in relationships, among others.

Abortion Survivors have the lived experience that “abortion care” or abortion being a form of “health care” is a farce. Abortion is not a simple medical procedure. Abortion is murder. It is designed specifically to terminate a “baby” in the common parlance used among pregnant women and society. The abortion industry prefers the euphemistic terms “termination of pregnancy” and “products of conception.” There is no

⁶ *Roe v. Wade*, 410 U.S. 113 (1973).

medical “care” intended for the most vulnerable, the least of these, in performance of abortions.

The Court has the chance to embrace all the lives impacted in a pregnancy, particularly the two most directly involved. The Court can let the least among us know they have a place to belong.

AMICUS – CREATED EQUAL

Abortion kills an “infant life.” *Gonzales v. Carhart*, 550 U.S. 124, at 159 (2007) (hereafter *Gonzales*). Created Equal has made part of its mission to educate anyone who will look or listen to the reality of abortion. Part of the way Created Equal exposes the violence and grim reality of abortion is through actual photos of the bodies of the children in the aftermath of this “choice”.

The use of victim imagery is widely debated. No matter the dispute, *Amicus* believes the underlying reason for pushback is almost always the same: Images awaken the conscience that many have worked diligently to silence. The abortion supporter is forced to acknowledge the violent, murderous “choice” for which they advocate and others are forced to acknowledge their inaction in the face of the American holocaust. Created Equal believes the images of the dismembered bodies of the victims of our culture of death “cry out” for justice more powerfully than anyone could ever do with words.

History provides ample evidence of the victim imagery's effectiveness. The civil rights movement, as we know it, likely would not have happened without magazines and newspapers around the country printing images of Emmitt Till's disfigured corpse. Domestic abuse ran rampant among NFL players for decades, but only Ray Rice, whose battery was captured on camera ever faced significant penalty. *Amici Created Equal* sees defending the defenseless as a duty and obligation and must do so with the most effective means at their disposal. Photos of scarred and furrowed backs of slaves were used in the Abolition Movement in the 1800's. *Amici Created Equal* gives the babies a platform and lets them "speak" for themselves.

Amicus Created Equal also hosts podcasts and organizes "Justice Rides", modeled after the Freedom Rides of the 1960's. The Freedom Rides allowed blacks and whites to come together to focus the attention of America for the purpose of exposing racism. Similarly, the Justice Rides allow human rights' defenders to come together to focus the attention of America for the purpose of exposing the truth of abortion.

Amicus Created Equal has an interest in assisting the Court having all the information, graphic though it may be, when weighing the equities in this case. If human life has value, and it does, *Amicus Created Equal* would urge the Court to take full stock of the consequences of abortion and weigh the value of the human lives at stake, all the lives, on both sides of the

scales, when determining whether to enjoin the Texas law from staying in effect.



SUMMARY OF ARGUMENT

The balance of equities and the public interest weighs in favor of allowing Senate Bill 8 to go into effect because:

I.

Allowing the Texas law to go into effect positively protects thousands of women from the irreparable injury of abortion trauma this court has already recognized.

II.

On the other hand, women will not be irreparably harmed if the law stays in effect because each woman can relinquish the baby, which she does not want at that time as a matter of law if she is seeking abortion, through the Texas Safe Haven law. Abortion is permanent. Pregnancy lasts months. No woman will suffer abortion trauma from what for many is the irreparable injury of killing the infant life inside her womb, the child. No abortion – no abortion-related trauma or “devastating psychological consequences” per *Casey*, or “severe depression and loss of esteem” per *Gonzales*, will injure women if Texas’ Safe Haven or other legally available alternatives are utilized.

III.

“Infant lives,” per *Gonzales* at 160, will otherwise be destroyed. Abortion is irrevocable and irreparable. It cannot be undone.

ARGUMENT**I. Abortion Hurts Texas Women. Allowing the Texas Law to Go Into Effect Protects Thousands of Women From the Irreparable Injury of Abortion Trauma This Court Has Already Recognized.**

Since the Texas law has been allowed to go into effect, many women have been spared the trauma of abortion’s “devastating psychological consequences” this Court has admitted in *Casey* which upheld informed consent laws thereby:

“ . . . reducing the risk that a woman may elect an abortion, only to discover later, with **devastating psychological consequences**,” that her decision was not well informed. *Planned Parenthood v. Casey*, 505 U.S. 833 at 882 (1992) (emphasis added).

The testimonies of 410 Texas Women Injured By Abortion, show abortion’s devastation when asked: “How has your abortion affected you?”⁷ They describe the horrible results of abortion: suicide attempts,

⁷ Link To 410 Texas Women Hurt By Abortion Testimonies – Friend of The Court: https://www.dropbox.com/sh/o2z2o9doxn3h0q5/AABHjkv-Pwvsedf5Rs_emo3ga?dl=0

substance abuse, grief, guilt, depression, trauma, nightmares, anniversary reactions, attachment disorders, and many other complications.

The Supreme Court in *Gonzales* unanimously came to the conclusion that abortion is a “difficult” and “painful” decision. The *Gonzales* Opinion stated, “Whether or not to have an abortion is a difficult and painful moral decision.”⁸ The five-person majority consisted of Justices Kennedy, Roberts, Thomas, Alito and Scalia. The four Justices in dissent: Justices Ginsburg, Stevens, Souter, and Breyer, also said: “The Court is surely correct that, for most women, abortion is a painfully difficult decision.” *Gonzales*, FN 7, at 183, per Ginsburg, dissenting. Thus, all nine justices agreed that abortion is “difficult” and “painful.” Why? Because at some level, most people “know” or “sense” that abortion kills a unique human life. That life hangs in the “balance” of equities.

Amy Hagstrom-Miller, the abortion business owner in this Court’s 2016 abortion case *Whole Women’s Health v. Hellerstadt*, 579 U.S. 582, 136 S. Ct. 2292 (2016) admitted: “Nobody gets pregnant to get an abortion.”⁹

⁸ *Gonzales*, 550 U.S. 124, at 159 (2007)

⁹ 5th Circuit ROA, 3091, line 17, 579 U.S. 582, 136 S. Ct. 2292 (2016) (Docket No. 15-274).

II. Texas' Safe Haven Law Meets The "Unwanted" Child Problem Of Women Without Killing "Infant Life" (See *Gonzales*), or Injuring Women With Abortion Trauma. Pregnancy Ends In Months, And Safe Haven Is The Humane Way To Balance The Equities.

Today, Texas offers women a better way to give women the freedom and liberty envisioned by *Roe* and *Doe* without killing the "infant" in the womb, *Gonzales*, at 160, and injuring the child's mother. This Safe Haven law is a better way. It is a dramatic social evolution in the law of criminal child abandonment, which has not been discussed before by this Court. Subsequent to *Casey*, and beginning in Texas in 1999, now **all fifty states** have adopted Safe Haven laws which allow women to be free from the burden of an unwanted child **without killing the child**. These laws remove all risk of injury to the woman from post-abortion trauma as a matter of law.¹⁰

Abortion Hurts Women. See *Amicus Curiae* Brief of 375 Women Injured By Second and Third Trimester Late Term Abortion filed in *Dobbs*, No. 19-1392, and also *Amici* 2,249 Women Injured By Abortion's written affidavits and declarations under penalty of perjury which describe the women's gruesome experience of abortion's "devastating psychological consequences,"

¹⁰ See www.nationalsafehavenalliance.org for a quick summary of every state with its own unique law.

Casey at 882, from abortion at all stages of pregnancy.¹¹ Many, many women are “morally” conflicted as this Court has already recognized in *Gonzales, supra*. Many women feel they have “murdered” their own child, with “devastating” consequences.

The affidavit of Norma McCorvey, the Texas woman who was “*Roe*” of *Roe v. Wade*, describes her experience working in the abortion industry. Norma changed her mind about abortion and her experience working in the abortion industry caused her to seek reversal of her case. This request is still on file in *McCorvey v. Hill*, 385 F. 3d 846 (5th Cir. 2004) (*cert. denied*) (Supreme Court Docket No. 04-967). Norma came to believe abortion was the intentional killing of children, *id.* as this Court finally recognized in *Gonzales* (infant life).

If the Texas law is preliminarily enjoined, women will have the “liberty” to kill “infant life.” When they do so, many will suffer the associated trauma, grief, and “devastating psychological consequences” as stated in *Casey* at 882, and “severe depression and loss of self-esteem” as stated in *Gonzales* at 159, that comes from killing an innocent human being. Under Texas Safe Haven law, any woman can now relinquish her baby at a hospital, fire station or other designated safe place, within a set period of time, which is 60 days

¹¹ See 4,728 Testimonies of Women Hurt By Abortion, https://www.dropbox.com/sh/p2fi4taxmrbivyz/AAAP_aenldXwXb34Ktcq_X8la?dl=0

in Texas.¹² If there is no abortion, she will suffer zero abortion related trauma, as *Amici* Women attest can last for decades.

The Safe Haven law is totally free to women, unlike abortion, making this liberty from unwanted parenting equally available to the rich and poor.¹³ Freedom or “liberty” from the unwanted child as described in *Roe* and *Casey* is now absolutely and totally guaranteed in all states, including Texas where it was first enacted in 1999, with much wider availability than abortion, at no cost to the woman, unlike abortion. Even small communities usually have a fire station, police station or emergency room of some kind. Some type of “medical facility” is far more abundant than abortion facilities. There are over 900 hospital Safe Havens in Texas,¹⁴ plus over 150 adoption agencies, and a countless number of emergency medical service providers.¹⁵

Using the Texas Safe Haven law, women don’t have to suffer the grief and trauma that many, many women have experienced after their abortion. The Texas Safe Haven law gives women far longer than the abortion industry does to decide which option they will choose – to personally care for the child, Safe Haven

¹² Texas Fam. Code Ann. §§ 262.301, *et seq.*

¹³ See www.childwelfare.gov (which also lists all 50 state Safe Haven laws). See Lynn Marie Kohm, “*Roe*’s Effects on Family Law,” *Washington and Lee Law Review*, Vol. 71, p. 139, 2014 discussing Safe Haven laws at 1354-1358.

¹⁴ <https://www.countyoffice.org/tx-hospitals>

¹⁵ <https://adopting.org/adoption-agencies-in-texas/>

relinquishment, or traditional adoption. Abortionists constantly pressure women to make quick decisions about abortion, claiming it is riskier the longer one waits, while also telling women it is “safe” no matter how late into the second or third trimester one has the abortion. The Texas Safe Haven Law gives the full length of pregnancy, plus an additional 60 days after birth to decide. If she is low-income, any Texas woman can have Texas Medicaid pay for her pre-natal care and delivery of the baby at no cost, with no legal obligation to care for the child whatsoever. The Safe Haven law eliminates the need for any woman of any color, income, or sexual orientation, to bear the burden of an unwanted child.

Low-income women are much better protected by the Texas Safe Haven law than they are by the abortion industry because Safe Haven **baby relinquishment is free to all women as opposed to an often-expensive abortion**. The abortion industry expresses concern for low-income women and is willing to disproportionately abort low-income women’s children, especially black or brown children. But Texas has decided this concern can be better served by providing free Safe Haven relinquishment and 18 years of freedom from parenting and providing for the child through adoptions by the millions of waiting families.¹⁶ Utilizing the Safe Haven law, no abortion-related guilt or trauma

¹⁶ “Thousands line up to adopt Safe Haven baby”, Christy Cooney, The Sun, June 28, 2019, <https://www.thesun.co.uk/news/9397746/new-born-baby-plastic-bag-atlanta-georgia/>

from taking the life of one's own child will fall on the pregnant mother.

Today, Safe Haven is a far better alternative, because **as a matter of law**, there are no unwanted children in Texas. Legal transfer of responsibility is free to every woman for any or no reason, if she so chooses.

No woman will be irreparably harmed if the law goes into effect. In addition to a huge number of aid and assistance programs, both public and private, the Texas safe haven law mandates that no Texas woman has to parent a child she does not want or that she is not capable of parenting. At no cost to herself, with no need to travel, she can safely relinquish her child to any hospital or EMS station within 60 days of birth. All medical expenses for pregnant low-income women will be paid by the state of Texas including delivery under Texas Medicaid.

III. “Infant Lives” Will Be Destroyed Every Day In A Brutal, Bloody, Inhumane, Cruel And Unjust Manner If The Texas Law Is Preliminarily Enjoined. Photos Of The Physical Results of Abortion Collected By Amicus Created Equal Documents The Often-Ignored Reality Of Abortion’s Destruction Of Human Life.

Amicus Created Equal has collected graphic images of abortion’s effect on actual human lives¹⁷ in order to convey the truthful, horrific reality of abortion. Just as images of the brutality of slavery in practice changed American opinion about slavery, viewing the actual images of aborted “infant life,” per *Gonzales* at 160, is a reality that cannot be ignored by those who champion abortion as a right. In balancing the equities, the Court must look at all the evidence on all sides of the issue. WARNING: These images are graphic and horrible, but are compelling truth that must be weighed in the balance. Should the woman’s right to immediate relief be the only paramount concern? Rather, she can wait the months until birth occurs naturally and she can then allow the Texas Safe Haven law to relieve her of all parental obligations at no cost to her. She need not undergo a gruesome abortion procedure which produces the death of an “infant life” as this Court has noted. Abortion death was gruesomely described by the Court in *Gonzales* at 135-138. But the photos below show the reality better even than the Court’s accurate, technical description in *Gonzales*. This evidence must

¹⁷ <https://www.youtube.com/watch?v=5cqCHWFqgLY>

be weighed on the scales of justice. Courts have reviewed gruesome photos before of car accidents, murders, products liability cases, acts of terror, etc., so it is with due respect to the sensibility of the Court that these pictures are shown. *Amicus* believes this reality and truth must be faced, lest we as an American society, be found ourselves to be “weighed in the balances and found wanting.” Daniel 5:27 (ESV).

These images are very painful, especially for *Amici* Texas Women Injured By Abortion to behold. Yet, even if they are withheld from women during the “informed consent” process by the abortion industry, they cannot be suppressed forever. *Amici* Texas Women have found information like this, or more beautiful pictures of living “infant lives” in the womb, even after abortion, as they search for information to answer the gut-wrenching question many ask themselves after the pregnancy was terminated: “My God, what have I done?” The Court weighing the balance of equities should weigh those thoughts and realities, as well as the truth depicted below.







As opposed to the infant life which will be destroyed, no woman will be irreparably harmed because, in addition to the large number of both public and private resources available to Texas pregnant women, the Texas Safe Haven law mandates that women can be free of the unwanted child as soon as he or she is born, or up to 60 days thereafter, if the woman needs more time to decide. The reality of holding her living child in her arms may change her mind, but that is her choice. But the choice to kill another human being should never be a legal choice. Exercising that legal choice to murder her own child can and does produce “devastating psychological consequences” to thousands and thousands of women. *Amici 410 Texas Women Hurt By Abortion* attest that many women become tortured

with such thoughts: “Where would my child be now?” “What would she/he look like?” At a friend’s daughter’s wedding, reality hits again: “My daughter will never get married. I murdered her.” Many *Amici* think such thoughts. Most humans have a natural reluctance at some level to kill another human. Yes, some do cross that line, and a just society pushes back to uphold the line of life.

Some of the *Amici* once thought of abortion as a simple medical procedure. Many were ignorant, or deceived by the lies and misrepresentations of the abortion industry, and abortion doctors who perform abortions routinely. *Amici* now believe that abortion is not a safe, simple medical procedure but is actually murder. In balancing the equities in this case, their experiences, their evidence, their voices can assist this Court in determining on the scales of justice whether aborting babies is murder or just a medical procedure? This Court must determine whether killing an infant life or relinquishing infant life through Texas Safe Haven law is a more equitable and just preliminary ruling.

◆

CONCLUSION

Given the sea change of law and circumstances evidenced by the Texas Safe Haven law, shouldn’t the citizens of Texas, in a federal system, through their elected officials, be allowed to enact laws to protect women’s health and human life, at least until this

Court can conduct a full review? *Amici* Abortion Survivors Network on behalf of the many children who have yet to come forth, and *Amici* women who were damaged by abortion, plead for the chance for others to live and women not to be injured.

Death by abortion lasts forever, pregnancy lasts only months after pregnancy is discovered and results in another human child in the world. Abortion is a bloody business. As the brief of the Jewish Rabbis filed in the *Dobbs* case sets forth¹⁸ Old Testament scriptures in Proverbs “God hates hands that shed innocent blood”¹⁹ and Jewish Law prohibits the sacrifice of babies. The *Roe* Court, unwittingly perhaps, unleashed a slaughter of innocent human beings in the United States unparalleled in history. Some of *Amici’s* very lives as abortion survivors show that the *Roe* Court was simply wrong about the viability, humanity and personhood of the baby in the womb. This Court should not continue either the error or the slaughter, especially when a better alternative exists.



¹⁸ *Amicus Curiae* Brief of Jewish Pro-Life Foundation, et al. No. 19-1392, *Dobbs v. Jackson Women’s Health*.

¹⁹ Prov. 6:8 and Jewish Law prohibits the sacrifice of babies.

PRAYER

Amici respectfully prays for this Court to deny the request of the United States for injunctive or declaratory relief against Texas and the citizens of Texas, and affirm the judgment below.

Respectfully submitted,

ALLAN E. PARKER
Counsel of Record for Amici Curiae
R. CLAYTON TROTTER
MARY J. BROWNING
THE JUSTICE FOUNDATION
8023 Vantage Dr., Suite 1275
San Antonio, TX 78230
(210) 614-7157
aparker@txjf.org