

Frederick J. Harrison #5-1586
FREDERICK J. HARRISON, P.C.
1813 Carey Avenue
Cheyenne, Wyoming 82001
307-324-6639

Denise M. Harle, GA Bar No. 176758*
ALLIANCE DEFENDING FREEDOM
1000 Hurricane Shoals Rd NE, Suite D-1100
Lawrenceville, GA 30043
(770) 339-0774
dharle@adflegal.org

Attorneys for Proposed Intervenors Rep. Rachel Rodriguez-Williams, Rep. Chip Neiman, and Right to Life of Wyoming, Inc.

**Admitted Pro Hac Vice*

**IN THE DISTRICT COURT OF THE NINTH JUDICIAL DISTRICT
IN AND FOR TETON COUNTY, WYOMING**

DANIELLE JOHNSON;)	
KATHLEEN DOW;)	
GIOVANNINA ANTHONY, M.D.;)	
RENE R. HINKLE, M.D.;)	
CHELSEA'S FUND; and CIRCLE OF)	
HOPE HEALTHCARE)	
d/b/a Wellspring Health Access;)	
Plaintiffs,)	
)	Case No. _____
v.)	
)	
STATE OF WYOMING;)	
MARK GORDON, Governor of Wyoming;)	
BRIDGET HILL, Attorney General for the)	
State of Wyoming;)	
MATTHEW CARR, Sheriff Teton County,)	
Wyoming; and)	
MICHELE WEBER, Chief of Police, Town)	
of Jackson, Wyoming,)	
Defendants.)	

AFFIDAVIT OF DAVID M. LIND M.D.

I, David M. Lind MD declare as follows:

1. The facts that I state are based on my thirty-eight years of practice as an OBGYN, my experience and my review of literature.
2. I submit this affidavit in support of the Life is a Human Right Act, a law that makes it illegal to provide elective abortions while still allowing medically necessary abortion services.
3. My background.
 - a. I am a lifelong resident of Cheyenne, born in the hospital where I practiced OBGYN for nearly 35 years. I received my Bachelors and Master's degrees in Zoology and Physiology from the University of Wyoming. I was accepted at Creighton University School of Medicine under the Wyoming contracts program and graduated in 1982. I completed the University of Wyoming Family Medicine Residency Program at Cheyenne in 1985 then completed a residency at Good Samaritan Medical Center in Phoenix, AZ in 1988. I joined Cheyenne Obstetrics and Gynecology, PC and practiced until I retired in January 2022. Since that time, I have provided Locums Tenens services to other Wyoming hospitals.
 - b. I provided obstetrical and gynecologic care, managed high risk pregnancies, provided obstetrical and gynecologic services as well as emergency care and surgery. I have delivered more than 7500 babies in my career.

4. The Life is a Human Right Act provides the unborn with the rights and dignity of all humans. It recognizes that unborn babies are individuals endowed by our creator with unalienable rights, particularly life.
5. The Life is a Human Right Act defines the situations that require medical treatment such as miscarriages and ectopic pregnancies and other conditions that will not result in a live human being.
6. This law provides for the rare circumstances in which an abortion is necessary to preserve the life of the mother.
7. This law also allows for termination of a pregnancy with a lethal anomaly, a condition in which the baby will not be able to survive outside the womb. These infants may be born alive, but would not live for more than hours or days after delivery. Physicians that are uncertain if they are caring for a pregnancy that involves a lethal anomaly will certainly have a second opinion from a perinatologist that concurs the baby would die in utero or shortly after birth, prior to ending the pregnancy.
8. The concern about mothers developing postpartum depression overlooks the reality of depressive conditions that occur after the mother has an abortion. Many women carry this “scar” with them for years.
9. Mothers, who aren't ready for a baby or another baby, would be able to give their baby up for adoption to a family that is ready and willing to raise that child.

10. Several physicians have discussed the medical conditions that occur when a woman is pregnant. These conditions occur in all pregnancies, not just the ones that were desired to be aborted.

Dated this 21st day of March 2023.



David M. Lind M.D.
Cheyenne OB/GYN
726 Oakhurst Dr.
Cheyenne, WY 82009

STATE OF WYOMING)
COUNTY OF LARAMIE)
)

The foregoing affidavit was sworn to or affirmed as true by David M. Lind M.D. before me on this 21st day of March 2023.

WITNESS my hand and official seal.

03.21.23
Date



Notary Public

(SEAL)
My commission expires: 04.05.2028

