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*Admitted Pro Hac Vice

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

DANIELLE JOHNSON;	b	
KATHLEEN DOW;	[d	
GIOVANNINA ANTHONY, M.D.;	bl	
RENE R. HINKLE, M.D.;	b	
CHELSEA'S FUND; and CIRCLE OF HOPE	b	
HEALTHCARE)	
d/b/a Wellspring Health Access;	bl	
Plaintiffs,	b	
		Case No.
v.		
STATE OF WYOMING;		
MARK GORDON, Governor of Wyoming;	D	
BRIDGET HILL, Attorney General for the State	of)	
Wyoming;	(
MATTHEW CARR, Sheriff Teton County,	D)	
Wyoming; and	b	
MICHELE WEBER, Chief of Police, Town of	- 11	
Jackson, Wyoming,	- 11	
Defendants.		
	,	·

AFFIDAVIT OF MICHAEL R. NELSON, DO

I, Michael R. Nelson, do depose and state under oath as follows:

- 1. I am an Obstetrician/Gynecologist, and have been in private practice in Cheyenne, Wyoming, since August 2005.
- 2. I have maintained state licensure, board certification, and have been a fellow of the American College of Osteopathic Obstetricians and Gynecologists since 2007.
- 3. I have performed over 3,000 deliveries and 2,000 other gynecologic procedures in that time.
- 4. I have cared for over 2 generations of women in Laramie County and plan to do so indefinitely.

- 5. Regarding HB0152/HEA 88, it is my professional opinion that banning elective abortions will not deprive any woman of life-saving health care.
- 6. Making it clear that this law does not endanger anyone are the spelled-out exceptions otherwise subject to the ban.
- 7. These exceptions allow for the crucial care in emergencies of otherwise tragic situations.
- 8. This includes spontaneous miscarriages, including inevitable and in progress, ectopic pregnancies, lethal fetal anomalies, cancer, and molar pregnancy.
- 9. Social situations that are tragic and emergent are also excluded from the ban, namely, rape and incest.
- 10. No physician should ever withhold care due to fear of the law, and this law spells out clearly those instances when the termination of pregnancy is appropriate.
- 11. The exceptions are broad enough that documentation in the medical record will qualify every instance of need.
- 12. The medical record should always reflect the nature of the diagnosis, so an undue burden is not present, either.
- 13. The need for abortion is persistently overstated by opponents of this legislation.
- 14. They also completely disregard the vulnerable individual in development during pregnancy.
- 15. While the risks of pregnancy to the mother are clearly spelled out, once again, the risks of abortion to long-term physical and mental health are completely disregarded.
- 16. The reality of intimate partner abuse remains and persists whether an abortion takes place or not, and an abortion may exclude a woman from obtaining vital services and support should she escape an abusive partner.
- 17. The Law has an honorable history of making every attempt to protect the most vulnerable individuals.

Dated this 21 day of March 2023.

Shiff Rhl

Michael R. Nelson Cheyenne OB/GYN 2301 House Ave., Ste. 400 Cheyenne, WY 82001

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STATE OF WYOMING )
COUNTY OF LARAMIE )
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The foregoing affidavit was sworn to or affirmed as true by Michael R. Nelson, DO before me on this day of March 2023.

3/21/23

Date

Sabrire Mortage

Notary Public

SABRINA MONTOYA
NOTARY PUBLIC
STATE OF WYOMING
COMMISSION ID: 188395
(SEAL)
MY COMMISSION EXPIRES: APR 10, 2028
My commission expires: