

# EXHIBIT 2

IN THE IOWA DISTRICT COURT FOR JOHNSON COUNTY

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PLANNED PARENTHOOD OF THE  
HEARTLAND, INC., and JILL  
MEADOWS, M.D.,

Petitioners,

v.

KIM REYNOLDS ex rel. STATE OF  
IOWA and IOWA BOARD OF  
MEDICINE,

Respondents.

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Equity Case No. \_\_\_\_\_

AFFIDAVIT OF CONNIE RYAN

I, Connie Ryan, declare the following is true and accurate under penalty of perjury:

1. I am the Executive Director of the Interfaith Alliance of Iowa and the Interfaith Alliance of Iowa Action Fund. Interfaith Alliance of Iowa and Action Fund includes individuals from a broad spectrum of faiths and beliefs who are dedicated to protecting religious freedom and individual rights, and working toward social justice in Iowa. I have served as Executive Director for nearly eighteen years.

2. In my role, among many other areas, I am honored to lead our policy advocacy and lobbying efforts, representing Interfaith Alliance of Iowa Action Fund and our supporters on a broad spectrum of issues of faith and freedom in Iowa. This includes engaging lawmakers directly, seeking to understand their position on issues and providing them with the viewpoint of our

organization, as well as relevant factual information. I have served in this capacity for ten legislative sessions.

3. As a result of my role as a lobbyist, I am familiar with the normal legislative process in Iowa to pass a bill into law.

4. In my role, I also work to engage our advocates and supporters on issues about which our organization cares deeply. This includes informing our advocates and supporters of bills being considered in the state legislature and, in some instances, asking our supporters to contact their elected representatives to make their voices and opinions heard.

5. We represent thousands of Iowa supporters and advocates across the state and work to engage them in advocacy on a broad spectrum of issues that stem from our mission.

6. Normally, when introduced, bills will appear on the legislative website. I will review them when they are introduced and, if a bill concerns the mission of Interfaith Alliance of Iowa Action Fund, I will work with our advocates and supporters and collaborate with ally organizations to ensure that our views are known and to provide information that may be helpful for legislators when deciding whether to support a particular piece of legislation.

7. Every Friday during the legislative session, I send a legislative update to our supporters and advocates, informing them of bills that have just been introduced and for which we are registered, as well as any updates on existing bills.

8. If something requires urgent attention, for example if an important bill is moving particularly quickly, I may send out an action alert to our advocates asking them to quickly contact their elected representatives.

9. Normally, a new bill will be assigned to a subcommittee after it is introduced in the relevant chamber. The subcommittee will then hold a hearing on the bill where anyone may speak before the legislation moves forward in the legislative process. This is the only regularly scheduled public meeting where lobbyists and the public can speak and be heard on proposed legislation.

10. I often will work with people to attend subcommittee meetings to ensure that a variety of voices are heard. For example, on issues relevant to reproductive rights and abortion in particular, I will ask members of the clergy who are among our supporters to speak at subcommittee meetings, ensuring that, as faith leaders, their views are fully understood and not simply assumed. It is important that lawmakers understand the faith community is not monolithic in its beliefs on abortion and that there is indeed a spectrum of beliefs.

11. I also speak at subcommittee meetings on a regular basis on issues relevant to the mission of Interfaith Alliance of Iowa and Action Fund.

12. For example, with respect to the five bills concerning abortion that, unlike H-8314, went through the usual legislative process during the 2020 Legislative Session, I spoke at subcommittee meetings for all five bills. Clergy members working with Interfaith Alliance of Iowa Action Fund also spoke at a number of the subcommittee meetings.

13. Normally, when I am aware that the legislature is considering a bill relevant to the mission of Interfaith Alliance of Iowa and Action Fund, I will also engage in direct lobbying with state legislators. This involves talking to them to understand their position on a given piece of legislation, informing them of the position of Interfaith Alliance of Iowa and Action Fund, answering any questions they have, and providing relevant factual information, including information about the likely consequences of a proposed bill.

14. I often publish a statement on behalf of Interfaith Alliance of Iowa and Action Fund, which I will then sometimes send Iowa legislators in both chambers.

15. In the case of H-8314, however, I was not able to take most of these steps because I did not learn of the bill until the evening of the day it was voted on, June 13, 2020.

16. H-8314 was passed via what is known as “double-barreling,” introduced as an amendment to an amendment. This is unusual and not the normal way bills are passed in the legislature. Double-barreling bypasses many of the normal processes for passing legislation, because it prevents legislators from proposing any fixes or further amendments and stifles debate.

17. Moreover, H-8314 was attached to an entirely unrelated bill that had nothing to do with abortion. In my experience, this tactic of amending a bill to something *entirely* unrelated is extremely uncommon.

18. Nothing about the way that H-8314 was passed was transparent, nor could it be characterized as good governance. I feel that the way the

legislative process was manipulated to sneak into law such a substantive and controversial bill, with no input from Iowans on a Saturday night at the eleventh hour of the legislative session, is simply wrong. It undermines and is harmful to the democratic process.

19. Because H-8314 was never introduced as its own bill, it never appeared on the legislative website until the evening it was voted on and was never subject to a subcommittee meeting, or even a subcommittee or full committee vote. As a result, our supporters and advocates were not able to make their voices heard to their elected representatives at a public meeting.

20. Because I only found out about the amendment hours before it was to be voted on, I did not have time to speak to elected representatives or give them information about the very real and devastating effects this bill will have on people seeking abortions in Iowa.


21. This is particularly important when the likely effects of the bill are not readily apparent by just reading it—it may not have been clear to legislators who voted for the bill that it requires many Iowans to travel enormous distances *twice* to receive an abortion. Many legislators likely did not realize that this would require people to take twice as much time off work, to spend twice as much money on transportation and childcare, and to very possibly wait *weeks* because of the backlog that will be created when health centers are suddenly required to see every patient twice. There is a plethora of real world consequences that legislators would have learned about had this bill been subject to the normal, transparent, democratic process.

22. While I was ultimately able to inform supporters and advocates of Interfaith Alliance of Iowa and Action Fund hours before the amended bill was passed, because of the incredibly short time frame, there was little our advocates could do other than email their elected representatives who were already in session.

23. Despite the ongoing COVID-19 pandemic, many of our supporters may have chosen to drive to the Capitol so that they could make their views known in person, if given sufficient time to do so.

24. For all the reasons above —and in particular because the legislature considered *five other* bills seeking to restrict abortion access, all of which went through the legislative process and *none* of which became law — I believe that it is entirely possible that had H-8314 gone through the normal legislative process and not been appended to an amendment on an entirely unrelated bill, it would not have passed.

Signed this 20<sup>th</sup> day of June, 2020.



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Connie Ryan