## In The Supreme Court of the United States

ALBERTO R. GONZALES, ATTORNEY GENERAL,

Petitioner,

77

LEROY CARHART, ET AL.,

Respondents.

On Writ Of Certiorari To The United States Court Of Appeals For The Eighth Circuit

BRIEF OF SANDRA CANO, THE FORMER "MARY DOE" OF *DOE V. BOLTON*, AND 180 WOMEN INJURED BY ABORTION AS AMICI CURIAE IN SUPPORT OF PETITIONER

LINDA BOSTON SCHLUETER Counsel of Record
ALLAN E. PARKER, JR.
RICHARD CLAYTON TROTTER
8122 Datapoint Drive
Suite 812
San Antonio, Texas 78229
Telephone: 210-614-7157
Counsel for Amici Curiae

Dr. David Reardon, one of the world's leading experts on the effects of abortion on women, further demonstrates the devastating psychological consequences of abortion. Dr. Reardon states that following temporary feelings of relief, there is emotional "paralysis" or post-abortion "numbness," guilt and remorse, nervous disorders, sleep disturbances, sexual dysfunction, depression, loss of self-esteem, self-destructive behavior such as suicide, thoughts of suicide, and alcohol and drug abuse, chronic problems with relationships, dramatic personality changes, anxiety attacks, difficulty grieving, increased tendency toward violence, chronic crying, difficulty concentrating, flash-backs, and difficulty in bonding with later children.<sup>79</sup>

The real life experiences of the post-abortive women also confirm what the research has discovered. The women were asked: *How has abortion affected you?* Typical responses from their sworn Affidavits<sup>80</sup> which are located at Appendix B included depression,<sup>81</sup> suicidal

App. B at 13-14. Teresa Renee Zell (North Carolina) – "Depression, nightmares, hospitalizations, suicidal thoughts and actions, guilt, anger at myself and those who forced the abortion, fear, eating disorder, alcoholism, low-self esteem, anxiety, stress." App. B at 26. Camelia M. Murphy (Texas) – "I have suffered with low-self esteem, self-hatred, suicidal impulses, constant anxiety (especially about sex and about making decisions) . . . " App. B at 95.

The Aftereffects of Abortion," www.afterabortion.info/complic.html (calling abortion a public health issue and listing the physical and psychological effects of abortion).

<sup>&</sup>lt;sup>80</sup> In addition, approximately 2,000 similar Affidavits from post-abortive women were given to the Task Force on Abortion in South Dakota which provided evidence that led to that State's ban.

For example, Cynthia Carney (Oklahoma) – "For 23 years, I went into crying spells, depression, suicidal thoughts. Emotionally it devastated me." App. B at 31. Elizabeth Campbell (California) – "I suffered from depression, migraine headaches, low-self-esteem. No self-worth . . ." App. B at 32. D.Q. (Tennessee) – "It has completely messed up my life. It was not the best way to start out in marriage. I was depressed, didn't want my husband to touch me, felt guilty, had suicidal thoughts, cried a lot, *terribly* depressed!" App. B at 11. S.O. (Florida) – "For twenty-eight years, I have mourned, gone thru depression around Victoria's birthdate, became angry as the years passed." App. B at 15-16.

thoughts, 82 flashbacks, 83 alcohol and/or drug use, 84 promiscuity, 85

 $<sup>^{82}</sup>$  For example, Donna M. Razin (Florida) – "Deep regret – initially I was suicidal – as the years have progressed I have developed a heightened level of bitterness and anger and self-hate." App. B at 12. Kim Marie Blackowiak (Minnesota) – "Yes, I was extremely sad, depressed, and suicidal after my abortion. After my abortion – I used drugs and alcohol frequently to numb the feelings." App. B at 33. Brandie M. Atwood (Arkansas) – "Abortion turned a 14-year-old school girl into a suicidal teenager that lived with feelings of guilt, rejection, and helplessness." App. B at 35.

Years went by of hiding it. Then something started triggering flash backs. Children's birthdays bring on extreme sadness. Christmas time brings on times of depression, regret, and wondering what would my children have been like. Could they have made a difference in the world. Why couldn't I have given them a chance at life like my mother gave me!" App. B at 12-13. S.T. (Tennessee) – "Depression and flashbacks after the abortion. I had no self-worth. I turned to drugs and alcohol and relationships with no meaning." App. B at 25.

<sup>&</sup>lt;sup>84</sup> For example, J.L.M. (Texas) – "11 years later I am obviously still affected. Initially, I suffered from depression, alcohol use increased, increased promiscuity, due to my lowered self esteem. My grades suffered in college. Relationships were difficult. I had nightmares, flashbacks, and grief." App. B at 14. Kristen Pettibone (Georgia) - "My abortion devastated me. I lost respect for my boyfriend, respect for myself. I became an alcoholic, dabbled in drugs to forget what I had done!" App. B at 16. Dana Nicole Landers (Florida) - "For years my abortion decision led me down a self-destructive path even until the point of wanting to die. I went from an honor roll student in high school to a drug addict. I suffered from depression, anger, guilt, regret, and denial just to name a few." App. B at 17. Deborah R. Paine (Georgia) -"I turned to 11 years of alcohol and drug addiction to cope with the regret. In my need to punish myself, I had a tubal ligation (sterilization). So I am childless. After killing my children, I did not deserve to be a mother." App. B at 19.

<sup>&</sup>lt;sup>85</sup> For example, Janice L. Bartlett (Florida) – "Devalued, dehumanized me. Took away my dignity and self-worth. Suffered from shame and guilt. Became depressed and even attempted suicide. Also led to use of alcohol, drugs, and sexual promiscuity." App. B at 22. C.L.R. (Arizona) – "My abortion immediately led to hopelessness, promiscuity, and drinking binges. I could not escape the pain and guilt. I've been through 19 years of intermittent counseling." App. B at 24. E.A.W. (Tennessee) – "Drugs and promiscuity didn't help." App. B at 27. (Continued on following page)

guilt, 86 and secrecy. 87 Each of them made the "choice" to abort their baby, and they have regretted their "choices." 88

Beverly A. Green (Minnesota) – "I went into a black tunnel for years. Started using drugs, drinking, more promiscuity, very insecure, hated myself – the list goes on . . . "App. B at 41.

<sup>&</sup>lt;sup>86</sup> For example, Hemda Ben-Judah (Georgia) – "I have lived with guilt for many years." App. B at 22. Connie Ambrecht (Georgia) – "Guilt felt for years . . . " App. B at 21. Mary Ellen York (Michigan) – "I was affected dramatically by my abortion. For years I couldn't even look at a baby and when I heard the word "abortion" I would just cringe. I suffered depression and I didn't like myself very much. Feelings of guilt. I found it very hard to forgive myself. It took my life from me." App. B at 26. J.S.W. (California) – "Guilt, shame, feelings of being a really horrible person." App. B at 28.

<sup>&</sup>lt;sup>87</sup> For example, T.J.H. (California) – " . . . deep sense of loss and guilt/secrecy." App. B at 18. Melody A. Athey (Kansas) – "I repressed any memory of the experience for 25 years. My whole lifestyle changed after my abortion. I started drinking heavily and married an alcoholic shortly after. I tried suicide once and considered it several times. I had repeated periods of depression especially around the anniversary date of my abortion. The guilt I felt was overwhelming." App. B at 35.

<sup>88</sup> For example, Cathy L. Moffat (Utah) - "I have regretted my choices the rest of my life." App. B at 13-14. Diane M. Hanson (Colorado) - "It changed my life, how I viewed myself, it took away my selfworth. It was devastating and caused several years of intense pain and sorrow. The hardest part was knowing 'it was my choice' that caused my baby's death and I couldn't do anything to change that or make it better!" App. B at 38. Lori Crossman (Michigan) - "It devastated me emotionally, mentally, and spiritually. I cannot go back and reverse my "choices" - I cannot get my children back. They are dead because abortion was legal and easy to access." App. B at 45. Dana Renee Nickles (Arkansas) - "In the beginning I thought I was doing the right thing. Only afterwards did I realize the TRUTH! My conscience was seared, my heart was broken. I lived in a state of depression looking at drugs as the answer to my problem. And the problem - I had killed my child! See you don't realize what happens to yourself until it's too late, you've already done it and there's no turning back. I can't turn back time - if I could - I WOULDN'T HAVE AN ABORTION!! I was emotionally torn apart." App. B at 15.