

EXHIBIT F

IN THE IOWA DISTRICT COURT FOR JOHNSON COUNTY

PLANNED PARENTHOOD OF THE
HEARTLAND, INC.; EMMA GOLDMAN
CLINIC; and JILL MEADOWS, M.D.,

Petitioners,

v.

KIM REYNOLDS, ex rel. STATE OF IOWA, *et*
al.,

Respondents.

Equity Case No. _____

**AFFIDAVIT OF LAURIE SCHIPPER
IN SUPPORT OF PETITIONERS'
MOTION FOR TEMPORARY
INJUNCTIVE RELIEF**

1. I am the executive director of the Iowa Coalition Against Domestic Violence (ICADV).
2. ICADV is a state level non-profit organization representing 21 programs providing direct services to survivors of domestic violence. ICADV provides training and technical assistance to member programs, and strives to engage all people in changing social and institutional contexts that perpetuate relationship violence.
3. Member programs served approximately 41,427 domestic violence survivors last year.¹
4. As executive director, I train and supervise professionals who work with victims of relationship violence in numerous capacities, including providing technical assistance, certification training to advocates and accreditation for local domestic violence programs providing shelter, crisis intervention, and advocacy to victims of interpersonal violence. I have personally assisted thousands of victims and their children in coping with or escaping from dangerous situations by assisting with housing advocacy, medical

¹ Iowa Attorney General's Crime Victim Assistance Division Annual Report SFY 19;
https://www.iowaattorneygeneral.gov/media/documents/Crime_Victim_Assistance_Division_FY_3E09FB33BFFC4.pdf

advocacy, criminal legal advocacy including providing expert testimony, crisis intervention and counseling.

5. Before this position, I served as the executive director of the Assault Care Center Extending Shelter and Support (ACCESS) in Ames, Iowa for approximately ten years. ACCESS provides services to victims of relationship violence, sexual assault, including housing advocacy, shelter, crisis intervention, medical advocacy, counseling, community education and prevention.
6. I have a Bachelor of Science in Social Work degree from Iowa State University, graduating in 1985. My CV is attached hereto as Exhibit 1.
7. I submit this affidavit in support of Petitioners' Motion for a Temporary Injunction to enjoin the application of the Governor's March 26, 2020 Executive Order limiting non-essential surgical procedures to prohibit abortion procedures in Iowa.
8. In my opinion, this prohibition will be devastating to the victims of relationship violence ICADV assists in Iowa.

ACCESS TO ABORTION IS ESSENTIAL TO VICTIMS OF RELATIONSHIP VIOLENCE

9. Women in abusive situations are at a heightened risk of unwanted pregnancy, either because their abusers do not care about helping them prevent these pregnancies or because their abusers actively seek to impregnate them as a mechanism of control. Many are also living in poverty, and for that reason have less access to contraception.
10. Reproductive coercion is an element of relationship violence that occurs when a partner uses intimidation, threats, or violence to impose his intentions upon a woman's reproductive autonomy. This includes rape, sabotaging contraception, and coercing a woman to become pregnant and carry a pregnancy against her will. Compelling a woman

to carry an unwanted pregnancy to term and give birth is a common form of abuse that can keep the woman trapped in the abusive relationship.²

11. Because of the association between abuse and unintended pregnancy, a significant percentage of women seeking an abortion are suffering and/or at risk for abuse. In one large scale study of women seeking abortion in Iowa, 13.8 percent reported having been subjected to physical or sexual abuse over the past year and 10.8 percent reported physical or sexual abuse by an intimate partner over the past year.³
12. Research indicates that 8 percent of women in the general population have experienced birth control sabotage or pregnancy promotion.⁴ Among the more relevant population of women at family planning clinics, 19 percent have experienced pregnancy coercion.⁵
13. Ways in which an abusive partner uses pregnancy as a means of controlling a victim include partners denying them access to birth control, such as by denying them the money or insurance they would need to obtain contraception), or by sabotaging their birth control. Some partners do so because they know that pregnancy, childbirth, and parenting will be physically taxing, and will create financial, emotional, and practical dependencies and legal ties that will make it harder or impossible for the victim to leave them.

² ACOG, Comm. Op. No. 554: Reproductive & Sexual Coercion (Feb. 2013), *available at* <https://www.acog.org/-/media/Committee-Opinions/Committee-on-Health-Care-for-Underserved-Women/co554.pdf?dmc=1&ts=20170625T1452309687>.

³ Audrey F. Saftlas, et al., *Prevalence of Intimate Partner Violence Among an Abortion Clinic Population*, 100 Am. J. Pub. Health 1412, 1413 (2010).

⁴ M.C. Black et al., National Center for Injury Prevention and Control, Centers for Disease Control and Prevention, *The National Intimate Partner and Sexual Violence Survey (NISVS): 2010 Summary Report* at 48 (2011).

⁵ Elizabeth Miller, et al., *Pregnancy Coercion, Intimate Partner Violence, and Unintended Pregnancy*, 81 Contraception 316, 318-19 (2010).

14. When partners sabotage contraception women are doubly trapped because carrying an unintended pregnancy to term poses great risk to their health and economic security. Unintended pregnancy doubles the risk for domestic abuse during pregnancy and women with a history of domestic violence are four times more likely to be abused during pregnancy than women in relationships that were not violent prior to pregnancy.⁶ And regardless of the prevalence of domestic violence, homicide by a spouse or intimate partner is the number one cause of death for pregnant women.⁷
15. By the same token, we see victims and survivors who are desperate to terminate their pregnancy so that they, and any children they have, can escape their situation and gain independence from their abuser. Indeed, research indicates that victims who manage to terminate their pregnancy are more likely to escape their situation and are less likely to suffer continuing physical violence than victims who seek to terminate their pregnancy but are unable to do so.⁸
16. ICADV service providers report that barriers to accessing abortion care increase a survivor's risk for harm from an abusive partner. Without access to abortion care many women return to abusive relationships they would otherwise leave and carry unintended pregnancies to term at great risk to themselves and other children.
17. In Iowa, ICADV has worked with survivors who were forced to stay with their abusers because they were raising small children and could not do so without financial assistance

⁶ Louis James et al., *Risk Factors for Domestic Violence During Pregnancy: A Meta-Analytic Review*, 28 *Violence and Victims* 359, 366 (2013).

⁷ *Id.* at 359.

⁸ Sarah Roberts, et al., *Risk of violence from the man involved in the pregnancy after receiving or being denied an abortion*, 12 *BMC Med.* 144 (2014).

from their abusers, as well as with survivors for whom ending their pregnancy allowed them and their children to escape and become independent of their abuser.

**DELAYING ABORTION PROCEDURES WILL FURTHER HARM SURVIVORS
OF DOMESTIC VIOLENCE**

18. Covid-19 presents significant challenges to individuals and families. Banning abortion procedures during this time further increases the risk of harm to women's health and poses greater risks for harm to victims of gender-based violence.
19. For survivors who already had appointments for abortion care, delaying that now increases their health and safety risk more broadly or even, eliminates access to care altogether. Many have limited times they can get away from an abusive partner.
20. Unlike many of the positive steps the state has taken to decrease public health risks in response to Covid-19, banning abortion procedures as part of the Governor's emergency response is unnecessary and runs counter to good public health policy, because it is directly harmful to women's health and safety.
21. Abortion is a time-sensitive medical procedure. Lack of timely access to abortion care threatens the health and economic stability of all Iowa women, and will disproportionately impact women who already face significant barriers to access abortion care, including victims of gender-based violence.
22. Delays in accessing abortion care increase health risks by forcing women to obtain care later in their pregnancies and for victims of gender-based violence, delays potentially make access to care completely inaccessible, which increases their health risks more broadly.

23. Victims of relationship violence in particular have an acute need for timely access to reproductive health services, especially abortion care. Enacting barriers to timely access to abortion services often subjects women to increasing levels of violence by abusers.
24. As the nation is urged to stay home to prevent the spread of this disease, the reality is that domestic violence survivors are not safe at home.
25. Our service providers are already reporting that the combination of stress, fear, job loss, and sickness is intensifying the number of calls their programs are receiving from victims in Iowa.
26. Isolating victims is a routine method of control used by abusive partners and emergency orders urging families to shelter in place in response to Covid-19 create unlimited opportunity to continue abuse virtually undetected.
27. Incidences of violence often spike in response to prolonged stress and disruption. The more stress that a family experiences, the greater the risk of escalating violence. Being trapped at home cuts off access to helping services. And for some victims it even impedes their ability to call for help. As a result, ICADV anticipates seeing an increase both in violence and higher incidences of non-reporting during this time.
28. This means that the need for timely abortion services and difficulties related to abortion access that exist absent the shelter-in-place circumstances of the pandemic are exacerbated by those circumstances. The Governor's decision to delay access to abortion services will only further increase the risks of abuse.
29. Additionally, law enforcement, courts, and health care providers are all limiting routine services to decrease risks to public health.

30. Just as victims face increased risks of physical violence and challenges seeking assistance, resources needed to provide relevant and needed services to women and children suffering abuse are incredibly strained right now. Victim service providers are scrambling to move some survivors from emergency shelter into off-site temporary accommodations in order to reduce the number of people in communal living spaces and allow for safe social distancing. Providers are also struggling to find resources to support clients who just got on their feet in their own housing but are now facing job loss and evictions, as well as those trapped at home with an abusive partner who are reaching out for help at the same time victim service providers are setting up remote and digital services.

CONCLUSION

31. In conclusion, Iowa women who experience domestic abuse must already overcome enormous obstacles to obtain abortions, in particular if they wish to keep their abortions private. These obstacles and risks are greater as a result of Covid-19. If the Governor is allowed to ban all abortion procedures in Iowa during the pandemic, many Iowa women experiencing domestic violence will be harmed. Delaying their abortion procedures will increase the risks of further abuse and make it more difficult for them to find safety and independence for themselves and their children.

CERTIFICATION

I certify under penalty of perjury and pursuant to the laws of the state of Iowa that the preceding is true and correct.

3/29/2020

Date



Signature

EXHIBIT 1

VITAE
Laurie Schipper



Education

1985

Bachelor of Science in Social Work
Iowa State University, Ames Iowa

Career Profile

1983-1985

Volunteer at Story County Sexual Assault Center. Worked with 150 battered women and 35 of their children. Contact occurred through crisis line and staffing shelter.

1984-1993

Member of the Iowa Coalition Against Domestic Violence and the Iowa Coalition Against Sexual Assault.

1985-1987

Shelter Coordinator, ACCESS, Ames, IA. Primary Counselor; Responsible for daily shelter operations; Provided phone counseling for 502 battered women, group counseling for 200 women and 120 children for a total of 2000 counseling hours.

1985-1993

Coordinated community domestic violence intervention project including education program for batterers' treatment and court watch program.

1985-Present

Provide extensive community programming on issues of rape, battering, and incest, including trainings for police, attorneys, mental health professionals and other battered women's shelters.

1986-1987

Facilitated support group for survivors of rape.

1987-1992

Co-facilitated therapy group for adult incest survivors; Provided supervision for an intra-familial sexual abuse treatment team.

1987-1993

Executive Director, ACCESS, Ames, IA. Counselor; Responsible for overseeing agency operation; Provided phone counseling for 1000 battered women, individual counseling and group

	with 310 women and 230 children for a total of 2600 counseling hours.
1988	Co-wrote/co-produced a training video concerning mandatory arrest in domestic violence situations.
1991-Present	Expert witness in approximately 125 criminal/civil cases at trial or by deposition addressing the issues of the effects of violence on children, characteristics of batterers, and the battered woman syndrome.
1992-2000	Conduct accreditation, train facilitators, and develop curriculum for the Batterers' Education Program through the Iowa Department of Correctional Services.
November 1993-Present	Executive Director, Iowa Coalition Against Domestic Violence. Represent 33 domestic violence projects in Iowa. Provide state-wide advocacy for battered women and children, technical assistance and training to shelters, criminal justice system, and health professionals.
November 1993-Present	Contracted by the Iowa Law Enforcement Academy to provide training on domestic violence to incoming cadets.
1993-August 1994	Court appointed to the Iowa Supreme Court Task Force on Domestic Violence. Part of a task force to provide the Iowa Supreme Court with recommendations to enhance the Court's and communities' response to domestic violence.
May 1995	Selected by the Family Violence Prevention Project, San Francisco, CA, to train family preservationists in Iowa about domestic violence. Part of a national model.
1995	Appointed by the Governor's Alliance Against Substance Abuse to the Violence Against Women Steering Committee. Appointed by the Steering Committee to be a member of the six person state team to represent our state in Washington D.C.
1996	Appointed by the Lt. Governor to the Violence Against Women State Coordinating Council.

1997	Appointed by the Department of Human Services to serve on Domestic Violence Welfare Reform Implementation Work Group.
1997	Appointed by the Department of Public Health to co-chair Health Leadership Committee on Domestic Violence for national Health Initiative Project with the Family Violence Prevention Project.
1998	Contracted with the Department of Human Services to develop curriculum and provide training to all promise jobs, FaDSS, child support recovery, income maintenance, and administrative staff on the Welfare Reform and Family Violence Option implementation.
2003	Appointed by the Governor of Iowa to the Iowa Fatherhood, Marriage, and Family Formation Advisory Group to provide recommendations to the Governor and Iowa Legislature.
2003-Present	Appointed by the Department of Public Health to the Women Health Advisory Committee.
1993- Present	Provided phone counseling, crisis intervention, or information/referral services to 700 battered women.
2003-2005	Department of Public Health's Women's Health Committee Member.
2004-2005	Member of National Advisory Board to National Resource Center on Domestic Violence
2006	Member of the National Domestic Violence Hotline Decade of Change Summit: Family and Relationships Work Group
2009-2011	Contracted to provide consultation, protocol development and training to the Department of Corrections and Child Support Recovery for the <i>Child Support and Prisoner Re-entry Project</i> .

National Affiliations

1995-Present

National Network to End Domestic Violence

Professional Training

Early Childhood Iowa Congress, *Hoops and Fences*, Des Moines, IA, 2/10/11 (Presenter)

Using Expert Witnesses in Domestic Violence Cases, Iowa Legal Aid CLE, 8/19/10 (Presenter)

Using Advocates as Expert Witnesses Prosecution, Des Moines, IA, 9/21/10 (Presenter)

Iowa State Public Defenders Conference, *Expert Testimony and Battered Women's Syndrome*, Tama, IA, 6/16/10 (Presenter)

Department of Human Services Child Protection Academy, *Intersection of Domestic Violence and Child Maltreatment*, Des Moines, IA, 3/4/10. (Presenter)

Expert Witness Testimony CLE, Iowa Legal Aid Webinar, Des Moines, IA, 2/18/10. (Presenter)

Child Support Recovery and Prisoner Re-entry Training, Department of Correctional Services, Ames, IA, 1/21/10. (Presenter)

Iowa Legal Aid CLE, *How to Work with the Domestic Abuse Survivor*, Des Moines, IA, 5/19/05. (Presenter)

Health Ministries for Nurse Practitioners, *Identifying, Documenting, and Intervening in Domestic Violence Cases*, Ankeny, Iowa, 5/9/05. (Presenter)

Family Violence Response Team Conference, Iowa Attorney General's Office, Waterloo, IA, 9/27/05.

National Network to End Domestic Violence Safety Net Project, *Electronic Confidentiality Workshop*, Des Moines, IA, 11/20/05.

National Network to End Domestic Violence Annual Conference on Domestic Violence, Puerto Rico, 11/15-17/04.

Des Moines Osteopathic School, Exploring the Human Condition, Des Moines, IA, 11/8/04. (Presenter)

Child Abuse Prevention Conference, *Overlap Between Domestic Violence and Child Maltreatment*, Des Moines, IA, 5/20/04 (Presenter)

Iowa Legal Aid CLE, *How to Work with the Domestic Abuse Survivor*, Des Moines, IA, 12/10/03.

Department of Public Health Barnraising Workshop, *Violence Across the Life Span*, 8/15/03. (Presenter)

Mercy Hospital Social Worker Workshop, *Domestic Violence Assessment and Intervention*, Des Moines, Iowa, 6/18/03. (Presenter)

Crime Victim Assistance Division of the Attorney General's Office Pearl's of Wisdom Conference, *Lessons We Have Learned from the Field*, 5/13/03. (Presenter)

National Network to End Violence Against Immigrant Women Conference, *Building Bridges and Using Advocates in VAWA Cases*, Miami, FL, 8/20/02. (Presenter)

Wyoming Coalition Against Domestic Violence Conference, *Hoops and Fences*, Casper Wyoming, 8/14/01 (Presenter)

Immigration CLE, *VAWA Provisions and Remedies and Using and Using an Expert Witness*, Des Moines, IA, 7/2/01. (Presenter)

National Council of Juvenile and Family Court Judges, Greenbook Conference, *Hoops and Fences*, Jackson Hole, WY, 9/24/00 (Presenter)

Employee and Family Resources, *Domestic Violence in the Workplace*, Cedar Rapids, 5/2/01. (Presenter)

Family Violence 2000 Conference, *Hoops and Fences*, Sioux City, IA, 4/6-7/00. (Presenter)

Child Abuse Prevention Conference, Keynote: *Hoops and Fences* and workshop: *The Overlap Between Spouse Abuse and Child Maltreatment*, Spencer, IA, 3/31/00. (Presenter)

Reasonable Efforts Conference, *The Overlap Between Spouse Abuse and Child Maltreatment*, Creston, IA, 3/8/00. (Presenter)

School of Osteopathic Medicine, *Identification, Documentation, and Referral*, Des Moines, 2/22/00. (Presenter)

Lydia Walker Conference, *Rural Battered Women*, Des Moines, IA, 11/2/99.

Domestic Abuse Response Team Training, Des Moines, 10/19/99. (Presenter)

Hamilton County Hospital Domestic Violence Teleconference Training, 4/28/99. (Presenter)

Everyone's Response-ABILITY Child Protection Conference, Spencer, 4/19/99. (Presenter)

Childhood Experiences Conference, *Overlap Between Spouses Abuse and Child Maltreatment*, Cedar Rapids, 4/11/99. (Presenter)

State Court Administrator Judges Conference, *Advocates as Expert Witnesses*, 11/10/98. (Presenter)

Iowa Attorney General's Victim Institute, Workshop: *Vicarious Traumatization*, 10/17/98. (Presenter)

Legal Services CLE Teleconference, *Expert Witness Testimony*, 10/7/98. (Presenter)

National Network to End Domestic Violence National Conference, Washington, D.C., June 6-9, 1998.

Prosecuting Attorney's Training Council, Trial Advocacy Course: *Using Advocates as Expert Witnesses*, May 14, 1998, Des Moines, IA. (Presenter)

Chapter for the Prevention of Child Abuse, *How to Intervene with Child Abuse When Domestic Violence is also Present*, Des Moines, IA, April 21, 1998. (Presenter)

Mid-West Home Based Family Practitioners Conference, Lake of the Ozarks, MO, April 17, 1998. (Faculty)

Maternal and Child Health, Hostages in Their Home: *Women and Children Living with Domestic Violence*, Des Moines, IA, April 17, 1998. (Presenter)

Child Protection Forum, *Collaborative Responses to Violence Against Women and Children*, March 30, 1998, Des Moines, IA. (Presenter)

Department of Corrections, Batterers Education Facilitator's Training Victim Safety, Des Moines, IA, March 13, 1998. (Presenter)

Department of Public Health; Domestic Violence: *Awareness and Protocol Training for Health Care Professionals*, Des Moines, IA, February 27, 1997. (Presenter)

Iowa Home Care Association Conference, Domestic Violence Intervention Protocol Training, Des Moines, IA, June 3, 1997. (Presenter)

Conference on Aging, Elder Abuse, Des Moines, IA, May 19, 1997. (Presenter)

American Bar Association and American Medical Association Domestic Violence Conference, Chicago, IL October 30, 1996. (Presenter)

Implementing the Containment Model in High Risk Cases of Domestic Violence and Stalking, Michael Lindsey, Des Moines, IA, June 21, 1996.

Victim Services Institute for Domestic Violence Advocates, Crime Victim Assistance Division, Des Moines, IA, April 30, 1996. (Instructor)

Iowa Association of Family Preservationists, Keynote Address, Marshalltown, IA April 16, 1997. (Presenter)

St. Luke's Hospital, Domestic Violence Intervention Protocol for Medical Personnel, Cedar Rapids, IA, March 12, 1996. (Presenter)

Pro Se Protection Order Training for Domestic Violence Advocates, Burlington, IA, March 3, 1996. (Presenter)

Family Law Seminar, *The Effects of Violence on Children: Child Custody Considerations*, Des Moines, IA, February 2, 1996. (Presenter)

Legal Services, CLE Training, *Victim Sensitivity*, Des Moines, IA, December, 1995. (Presenter)

National Violence Prevention Conference, *Rural Battered Women*, Des Moines, IA October, 1995. (Presenter)

Family Preservation Training on Domestic Violence, Ames, IA October, 1995. (Presenter)

Trial Lawyers Association Family Law Conference, Cedar Rapids, IA July 1995. (Presenter)

National Coalition Against Domestic Violence Conference, St. Paul, MN, 1994.

Attorney General's Law Enforcement Conference, Des Moines, IA, December, 1994. (Presenter)

National Summit Conference on Family Violence, Chicago, IL 1994.

Priorities '95 Conference, Report to Women's World Conference in Beijing, 1994. (Presenter)

Symposium on Women's Health, St. Lukes Hospital, Sioux City, IA, 1994. (Presenter)

Batterers Education Facilitators Training, Iowa Department of Corrections, Ames, IA 1993/1994. (Presenter)

Family Violence Conference, IA Chapter National Committee for the Prevention of Child Abuse, Des Moines, IA, 1993. (Presenter)

Same Sex Domestic Violence Conference, St. Paul, MN, 1993.

Representing the Domestic Abuse Client, Volunteer Attorney Project, Ames, 1993. (Presenter)

Pro Se Domestic Abuse Victim Advocate Community Legal Education Program, Des Moines, 1993.

In Defense of Battered Women Conference, Ann Arbor, MN, 1992.

Batterer Education Facilitation Training, Iowa Department of Correctional Services, Ames, 1992.

Enhancing the Response to Domestic Violence Conference, Des Moines, 1991.

Multiple Personality Disorder, Richard Lowenstien, 1991.

Healing the Incest Wound, Advanced Workshop, Christine Curtois, 1990.

Battering in the 90's Conference, Minneapolis, MN, 1989.

Courage to Heal Workshop, Laura Davis, 1989.

Sexual Exploitation, Minnesota Task Force to End Sexual Exploitation, 1988.

National Coalition Against Domestic Violence Annual Conference, Portland, OR, 1988.

Intrafamilial Sexual Abuse Conference, Waterloo, 1987.

Co-dependency, Ann Wilson Schaff, Des Moines, 1987.

Child Advocacy Conference, Iowa Attorney General's Office, Des Moines, IA, 1987.

National Coalition Against Sexual Assault Annual Conference, Chicago, 1986.

National Coalition Against Domestic Violence Annual Conference, St. Louis, MO, 1986.

Working with Batterers, Duluth Training Model, Duluth, MN, 1985.