

**Exhibit 5**

**Exhibit 5**

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*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

LOURDES MATSUMOTO, NORTHWEST  
ABORTION ACCESS FUND, and INDIGENOUS  
IDAHO ALLIANCE,

*Plaintiffs,*

v.

RAÚL LABRADOR, in his capacity as the Attorney  
General for the State of Idaho,

*Defendant.*

) Case No.: 1:23-CV-00323-DKG  
)  
)  
) **DECLARATION OF**  
) **TAI SIMPSON**  
)  
)  
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)

I, TAI SIMPSON, hereby declare under penalty of perjury that the following statements  
are true and correct:

1. I am over 21 years of age, I have personal knowledge of the facts contained in this declaration, and I am competent to testify about them.

2. I am a member of the Nimiipuu Nation, also called the Nez Perce Tribe of Idaho. The traditional, usual, and accustomed lands of my people, like those of other tribes whose territory encompasses land within Idaho, are often recognized as transecting and incorporating land within the U.S. state/Canadian provincial boundaries of Washington, Idaho, Montana, Wyoming, British Columbia, and Alberta.

3. My life's calling is to continue to serve the storied culture of my people through trust-based mutual care and aid.

4. To that end, I co-founded and helped organize Indigenous Idaho Alliance (IIA), under the laws of the state of Idaho, in order to facilitate that mutual care and aid.

5. I have been an officer or director of Indigenous Idaho Alliance, Inc., an Idaho 501(c)(3) non-profit organization, since 2012.

6. IIA's work includes serving the five tribes whose traditional, usual, and accustomed lands encompass territory within Idaho, and whose traditional, usual, and accustomed lands are often recognized as transecting and incorporating land within the U.S. state/Canadian provincial boundaries of Washington, Idaho, Montana, Nevada, Utah, Wyoming, California, British Columbia, and Alberta. In this declaration, I may occasionally refer to these lands as "the region."

7. The region has one of the highest per capita populations of Indigenous people in the political boundaries of the United States. IIA's work also includes serving Indigenous people from other tribes across the U.S. who are in this area and far from their reservations and homelands.

8. Our work at IIA is centered around asserting the sovereignty of all Indigenous people by focusing on education, community care, awareness, and collaboration in order to empower a healthy and just Indigenous community in Idaho.

9. IIA does this work in accordance with the storied culture of the Indigenous communities we serve and our tradition of trust-based mutual care and aid.

10. Our priorities and efforts also involve seeking justice for the Missing and Murdered Indigenous People (MMIP) and their families as well as providing support to survivors of gender-based violence.

11. As part of its work prioritizing the health and wellness of the Indigenous communities we serve, IIA provides mutual aid and financial support to community members throughout the region. This includes distributing cash and gift cards to community members, including those assisting minors.

12. IIA has also provided financial and educational support through trusted Indigenous community members working on behalf of young people, including survivors of gender-based violence.

13. Our work in support of our communities' health and well-being also includes assisting individuals seeking medical care in states where such care is lawful.

14. IIA communicates our commitment to mutual aid and to supporting access to legal health care for all people, including minors, at community events, which include sweat lodge, longhouse, and pow wows. These are multigenerational spaces and the information we share is available to community members of all ages.

15. IIA also tables at community events and provides information regarding abortion and other necessary community care needs through pamphlets, Post-Its, condoms, and stickers.

These are also multigenerational spaces and the information we share is available to community members of all ages.

16. Some of IIA's financial assistance has been used by Idaho minors to obtain abortion care outside of Idaho.

17. For example, on or around March 18, 2023, I received a request for mutual aid funds in my role with IIA. I facilitated IIA's provision of funds to a community member, who used those funds to assist a pregnant minor in obtaining a lawful abortion outside of Idaho.

18. I do not know whether those funds were used for the cost of the procedure, travel, or related expenses. I do know that IIA provided funds that enabled the minor to obtain medical care, and that the care sought in this instance was an abortion.

19. Although IIA's funds were used to support abortion access, at the time the funds were provided, I did not know the specific care that would be sought. That is often the case when working under IIA's traditional model. This model is based on community trust, rather than the Western practice of detailed disclosures. This approach reflects our belief that those in need are best positioned to determine what support they require, and that aid can be provided without interrogation.

20. Our work depends on maintaining trust within the community. It is also consistent with our cultural practices to receive information that is voluntarily shared, rather than demand additional details.

21. Because of our Indigenous model of community-based care, in many instances, we learn how funds are used during or after assistance is provided.

22. This is particularly true when we provide support to individuals, including minors, who have experienced gender-based violence. Between 2018 and 2021, IIA provided

financial assistance to three minors seeking care after sexual assault. In each of those instances, a community member close to the minor contacted us and implied the type of assistance needed. In one of these instances, IIA provided financial assistance where we understood that a parent was not aware of the minor's abortion. In the other instances, parents or guardians may or may not have known.

23. We have continued to provide mutual aid to members of the community who continue to help minors, in line with our trust-based model. If the community continues to deeply trust us we will continue to receive specifics about how our aid is used.

24. Because the communities we serve have experience gender-based violence at high rates and because needs in our community often arise as a result of socioeconomic oppression, we foresee being called upon to provide support in situations like these in the future, and in situations where it would not be safe for a parent or guardian to know.

25. These observations are grounded in my experience and informed by research, including work from the Urban Indian Health Institute and related scholarship on violence against Indigenous women and girls.

26. We are approached for support in cases involving abortion health care in part because IIA holds itself out as an advocate and trusted resource for the community. We openly share our belief that all pregnant people, including minors, should be able to access lawful abortion care, and that modern state lines—imposed on lands long inhabited and traversed freely by Indigenous communities—should not restrict movement. Consistent with that role, IIA provides abortion-related information and support through community interactions, including gatherings, ceremonies, and public events.

27. IIA has a long history working with access to reproductive care. We are frequently called upon to help connect people with emergency contraceptives, including through

overnight couriers. IIA distributes emergency contraception to all community members who request it, including to minors.

28. Since the injunction was lifted on transporting or harboring, I have not driven across state lines with a minor. However, I have previously driven adults. Absent Idaho Code § 18-623, IIA would be able to provide the same forms of support to minors that we currently provide to adults, consistent with our existing practices.

29. Since the decision in *Dobbs v. Jackson Women's Health Organization* and Idaho's abortion ban, the communities we serve have needed more support to access lawful abortion care. We do not believe we can withhold information about such care based on age or level of parental involvement.

30. Since *Dobbs*, we have also partnered with other tribal organizations to obtain grant funding to educate our community about abortion options and intend to continue those partnerships following this litigation.

31. To serve our community, we work with a large group of advisors and "aunties" and matriarchs and kinship models, who are closest to those in need. Our work with these trusted adults expresses our shared commitment to protecting vulnerable youth.

32. If we cannot work closely with these trusted individuals—who often understand whether parental involvement is safe—or if we fear prosecution, the mutual aid network we have built will be disrupted. IIA would no longer be trusted. Young people could be exposed to increased harm. This will prevent us from serving young people who seek our support and will hinder our broader work.

33. We routinely coordinate transportation or arrange accommodations for adults seeking abortion or other medical care. We also do this for minors' medical care. The fact that

adults with greater resources have required this assistance for abortion care suggests that such requests from minors would arise.

34. While we do not understand exactly where the line between illegal and legal conduct is under this law, IIA understands that Idaho Code § 18-623 seeks to prohibit and criminalize aspects of our work, including assisting minors in traveling for lawful abortion care and providing information or advice related to abortion access when we know a parent is unaware.

35. Our activities and the mutual aid we provide are undertaken, in part, to convey a message that abortion is lawful health care and that individuals should be able to access such care with dignity, autonomy, and community support.

36. We understand our actions—particularly providing assistance without requiring approval from others—as expressing a clear message about individual autonomy in health care decisions in line with our traditions and beliefs.

37. Our message of support—expressed through our mutual aid—is disrupted and altered if we must assess or inquire into a parent’s involvement in that decision. We cannot change our message or our aid practices to investigate whether funds are being used for an abortion as opposed to another medical need without disrupting the traditions and culture we uphold.

38. IIA does not determine or manage whether a parent or guardian is informed. Those decisions live within the community and with the individuals closest to the situation. Our role is to respond to requests for support, not to direct communication.

39. Our work depends on networks of trusted staff, volunteers, advocates, and community members who collaborate to support individuals seeking abortion care. Through these relationships, we convey a shared message that abortion is lawful medical care in other

states, that personal autonomy matters, and that our communities will support its members without stigma, judgment, or interrogation.

40. Idaho Code § 18-623 has disrupted and continues to disrupt these networks by exposing those within our network, and IIA, to potential criminal liability, particularly where a minor seeks abortion care without clearly defined parental involvement.

41. As a result, the law forces us to choose between chilling, curtailing, modifying, or ceasing our activities, including assisting minors and collaborating with others, or risking prosecution.

42. This harm is compounded by uncertainty about the scope of prohibited conduct, including the meaning of terms such as “procure.” For example, we do not know whether providing a credit card that is used to pay for care, a gas card used for travel to a clinic in another state, or funds to support a trusted adult providing housing and food would be considered procuring, transporting, or harboring. This uncertainty makes it difficult to determine what conduct is lawful and chills our work so that we do not risk inadvertent violations.

43. Our desired activities—including providing information, coordinating care, offering logistical support, and assisting with travel—would continue to expand but for Idaho Code § 18-623. We have the contacts and support networks necessary to provide transportation and housing assistance.

44. Members of IIA’s community networks, including organizers and trusted adults, have in the past provided or facilitated transportation for individuals seeking abortion care, including across state lines. I have done so too. I cannot travel with a minor if I wanted to, which is a restriction on my cross-state movement.

45. When I traveled with a pregnant person for lawful abortion care, it was not merely an act of transportation. I am conveying to that person that I am there for them. That their decision is important and meaningful and theirs to make, but also that that person is not alone and has the support of the community.

46. Actions in our work speak louder than words, particularly in communities often let down by words. Physical accompaniment is a message in the community IIA serves. I see this as particularly important with those who have experienced gender-based violence.

47. The politicization of the bodies of people capable of reproduction in Idaho impacts our efforts to provide messages of support and solidarity to minor survivors of gender-based violence and also disrupts our messages about solidarity across the tribal communities in the Pacific Northwest that may not conform to modern boundaries.

4/13/2026

Date

tai simpson

**Exhibit 6**

**Exhibit 6**

In The Matter of:

Lourdes Matsumoto, Northwest Abortion  
Access Fund, and Indigenous Idaho Alliance

v.

Raul Labrador, in his capacity as the  
Attorney General of the State of Idaho

**DEPOSITION OF  
IRIS ALATORRE,  
30(b)(6) DESIGNEE FOR NWAAF  
February 06, 2026**



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1 DEPOSITION OF IRIS ALATORRE,  
2 30(b)(6) DESIGNEE FOR NORTHWEST ABORTION ACCESS FUND  
3  
4 BE IT REMEMBERED that the deposition of  
5 IRIS ALATORRE was taken via videoconference by the  
6 Defendant before Treasure Valley Reporting, Rebecca  
7 Martin, Court Reporter and Notary Public in and for the  
8 State of Idaho, on Friday, the 6th day of February,  
9 2026, commencing at the hour of 10:30 a.m. Mountain Time  
10 in the above-entitled matter.

11  
12

13 APPEARANCES:

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1 individuals pay for costs related to accessing  
2 abortion care.

3 Q. Is it fair to say that NWAAF's primary  
4 objective is to pay for abortion care?

5 MS. OLSON: Objection; form.

6 Q. (BY MR. GREEN) You can answer.

7 A. If I'm thinking about our mission, our  
8 primary objective is to support people in accessing  
9 abortion care.

10 Q. And the way an abortion fund does that  
11 is by paying for abortion, right?

12 MS. OLSON: Objection; form.

13 THE WITNESS: That's one of the ways.

14 Q. (BY MR. GREEN) Okay. And that's the way  
15 you most often use, right?

16 MS. OLSON: Objection; form, foundation.

17 THE WITNESS: Most often? I mean, I'm  
18 thinking about our -- how we spend our money. That  
19 is, yes, the way we most often support people  
20 accessing abortion care.

21 Q. (BY MR. GREEN) And are you a nonprofit?

22 A. Yes.

23 Q. Okay. How do you fund yourself?

24 MS. OLSON: Objection; form.

25 THE WITNESS: We receive donations from

1 Can you repeat your question?

2 Q. (BY MR. GREEN) Sure.

3 Does this look like a copy of Idaho Code  
4 18-623 to you, having read it previously?

5 MS. OLSON: Objection; foundation.

6 THE WITNESS: Yes, it looks like it.

7 Q. (BY MR. GREEN) Is there any part of  
8 Idaho Code 18-623 that you don't understand?

9 MS. OLSON: Objection; form.

10 THE WITNESS: Yes.

11 Q. (BY MR. GREEN) Which parts?

12 A. The language around "procures an  
13 abortion," it feels -- it's vague. It's, like,  
14 what -- what does "procure" mean in this context  
15 and what is it that NWAAF does or doesn't do that  
16 falls within this context? It's confusing.

17 Q. Okay. You said -- sorry, go ahead.

18 A. I guess I'll leave it at that for now.

19 Q. Well, are there any other areas of the  
20 statute that you don't understand?

21 A. No.

22 Q. So you understand the rest of the  
23 statute?

24 A. Yes.

25 Q. Okay. Now, you said the language

1 Q. (BY MR. GREEN) I heard "yes."

2 Was that correct?

3 A. Yes.

4 Q. Okay. And do you understand the  
5 word "recruiting" to have a meaning?

6 MS. OLSON: Objection; form, foundation.

7 THE WITNESS: Yes.

8 Q. (BY MR. GREEN) Let's turn back to  
9 topic 1 and let me -- can we pull up Exhibit 1  
10 again?

11 I'm going to ask you a couple of  
12 questions about topic 1.

13 A. Okay.

14 Q. Let me just establish, you know, when I  
15 talk about minors henceforth in this deposition, if  
16 I say "minor" instead of "Idaho minor," I'm always  
17 asking you about Idaho minors.

18 Does that make sense?

19 A. Yes.

20 Q. Okay. Does NWAAF procure abortions?

21 MS. OLSON: Objection; form.

22 THE WITNESS: Again, "procure" feels like  
23 such a vague term it's hard to -- it's hard to  
24 answer that question without fully understanding  
25 what falls under the scope of "procure."

1 MS. OLSON: Objection; form.

2 Q. (BY MR. GREEN) If you need that question  
3 read back, I can ask the court reporter to do that.

4 A. Can you read the question again?

5 MR. GREEN: Yeah, please.

6 (The record was read from page 28, lines 14-16.)

7 MS. OLSON: Objection; form.

8 THE WITNESS: The Northwest Abortion Access  
9 Fund does not procure abortions by recruiting  
10 minors. We do support minors in accessing abortion  
11 care if that is what they would like.

12 Q. (BY MR. GREEN) Does NWAAF have any plans  
13 to procure abortions by recruiting minors in the  
14 future?

15 MS. OLSON: Objection; form.

16 THE WITNESS: We don't have plans to procure  
17 abortions by recruiting minors. We do have plans  
18 to continue to support minors in accessing abortion  
19 care if that's what they would like.

20 Q. (BY MR. GREEN) Okay. Does NWAAF provide  
21 logistical, practical, and financial assistance to  
22 minors to access abortion?

23 A. Yes.

24 Q. State all the ways it does so.

25 A. We support minors in figuring out how to

1 get to and from their procedure, what mode of  
2 transportation they might have access to, paying  
3 for the transportation. We support them in having  
4 safe lodging if they are needing to travel a long  
5 distance to get to their abortion appointment.

6 We support them with other basic needs  
7 like meals, medication, prescription costs, paying  
8 for child care if that is a need that they have,  
9 and paying for their abortion procedure.

10 Q. Anything else?

11 A. We do also provide emotional support.

12 Q. Anything else?

13 A. No.

14 Q. Okay. Does NWAAF have any future plans  
15 to provide logistical, practical, and financial  
16 assistance to minors to access abortion other than  
17 the ones you've previously discussed?

18 MS. OLSON: Objection; form.

19 THE WITNESS: We would like to be able to  
20 provide rides to minors.

21 Q. (BY MR. GREEN) Does NWAAF have any plans  
22 to provide rides to specific minors?

23 A. Any plans? Currently, no.

24 Q. Does NWAAF have vehicles that it owns?

25 A. No --

1           A.     Encouragement in the context of  
2     accessing abortion care or just encouragement  
3     overall?

4           Q.     Fair point. Let me change my question.

5                     Does NWAAF provide encouragement,  
6     counseling, advice, information, emotional  
7     assistance, and support to minors seeking abortion?

8           A.     Yes.

9           Q.     How does it do so?

10           A.    Well, we have -- one of our values  
11    includes trust and autonomy, and when we support  
12    anybody, including a minor, we really center that  
13    in how we support them. And so we trust that they  
14    are telling us what they need, and we believe in  
15    their autonomy as individuals to access the care  
16    they need, whether or not that's an abortion or  
17    other resources.

18                     We never encourage somebody to get an  
19    abortion if they have expressed any hesitation  
20    around it. We really serve as somebody who is  
21    there to be supportive and nonjudgmental and  
22    helping them in accessing or, like, getting  
23    whatever resources would be most beneficial to them  
24    in how they've identified that to us.

25           Q.     Are there any other ways that NWAAF

1 provides encouragement, counseling, advice,  
2 information, emotional assistance, and support to  
3 minors seeking abortion?

4 MS. OLSON: Objection; form.

5 THE WITNESS: No.

6 Q. (BY MR. GREEN) Turning to topic 3, I  
7 understand NWAAF does not procure abortions.

8 Does that mean NWAAF does not procure  
9 abortions by harboring minors?

10 MS. OLSON: Objection; form.

11 THE WITNESS: We do not harbor minors, no.

12 Q. (BY MR. GREEN) Okay. Any plans to do so  
13 in the future?

14 A. No.

15 Q. Okay. Does NWAAF harbor minors  
16 generally?

17 A. No.

18 Q. Turning to topic 4, has NWAAF procured  
19 abortions by transporting minors?

20 MS. OLSON: Objection; form.

21 THE WITNESS: We have in the past  
22 transported -- provided transportation to minors  
23 and other individuals to access abortion care.

24 Q. (BY MR. GREEN) Okay. Speaking of  
25 minors -- I'll remind you I'm only talking about

1 Idaho minors -- how many times has NWAAF procured  
2 abortions by transporting minors?

3 MS. OLSON: Objection; form, foundation as  
4 to time period.

5 THE WITNESS: Like, in the history of the  
6 entire time NWAAF has existed or within a time  
7 period?

8 Q. (BY MR. GREEN) To the extent you can  
9 recall.

10 A. The only instance I can recall is the  
11 instance in which I transported a minor, an Idaho  
12 minor.

13 Q. And when you say "I," you're referring  
14 to yourself, Iris Alatorre, not NWAAF?

15 A. Yes.

16 Q. And you're referring to the topic we  
17 discussed in your individual deposition?

18 A. Yes.

19 Q. Does NWAAF have any plans to procure  
20 abortions by transporting minors in the future?

21 MS. OLSON: I'm going to object and insist  
22 that at least on this question you use "Idaho  
23 minors."

24 Q. (BY MR. GREEN) Okay. Does NWAAF have  
25 any plans to procure abortions by transporting

1 Idaho minors in the future?

2 A. We would like to. At the moment we  
3 don't have plans.

4 MR. GREEN: We'll turn to topic 5 next, and  
5 I'll have the court reporter mark and share  
6 Exhibit 3.

7 (Deposition Exhibit No. 3 was marked.)

8 Q. (BY MR. GREEN) Do you see the document  
9 that's been marked as Exhibit 3 in front of you?

10 A. Yeah. Is it the one titled "Complaint  
11 for Declaratory Judgment"?

12 Q. Yes, it is.

13 Have you seen this document before?

14 A. Yes.

15 Q. And this is the complaint you filed in  
16 this case, right?

17 A. Yes.

18 MR. GREEN: Okay. I'll have the court  
19 reporter go to paragraph 45.

20 Q. (BY MR. GREEN) I'll just have you read  
21 that to yourself, and just let me know when you're  
22 done.

23 A. I'm done.

24 Q. Okay. Is there anything not listed in  
25 paragraph 45 that NWAAF does to procure abortions?

1 EXAMINATION

2 BY MS. OLSON:

3 Q. I have some questions.

4 Good afternoon, Ms. Alatorre.

5 You recall Mr. Green asked you some  
6 questions using the term "procure."

7 Do you recall those questions?

8 A. Yes.

9 Q. Ms. Alatorre, what do you understand  
10 "procure an abortion" to mean?

11 A. I -- it's -- it sounds like -- I mean,  
12 the term "procure," I have never really heard in  
13 reference to this work. I understand the  
14 word "procure" to mean, like, something related to,  
15 like, an industry or, like -- like, obtaining  
16 materials, et cetera.

17 So if I were to try to think of what  
18 that means related to abortion, I, like, envision  
19 procuring an abortion being, like, me calling up an  
20 abortion provider and trying to buy abortions from  
21 them. So that is, I guess, how I'm  
22 defining "procuring an abortion," is calling big  
23 abortion and saying, "Hey, we want to buy this many  
24 pallets of abortion."

25 Q. Ms. Alatorre, is NWAAF concerned that

1 NWAAF has a different definition of procure than  
2 the Idaho Attorney General?

3 A. Yes.

4 Q. Then, Ms. Alatorre, you recall that  
5 Mr. Green asked you questions about intent to  
6 conceal?

7 A. Yes.

8 Q. How does NWAAF address whether or not to  
9 have contact with a minor's parent or guardian  
10 where it's a minor who has contacted NWAAF  
11 regarding abortion care services?

12 A. We don't have any processes or policies  
13 in place around that kind of contact. We lead --  
14 we let the individual we're supporting, including  
15 minors, lead whatever communications or information  
16 they want shared with anybody.

17 Q. Is NWAAF concerned that NWAAF has a  
18 different definition or practice with respect to  
19 "intent to conceal" than the Idaho Attorney  
20 General?

21 A. Yes.

22 Q. Is NWAAF concerned that the Idaho  
23 Attorney General might consider the way NWAAF  
24 handles minors' choices about whether or not to  
25 communicate with a parent or guardian the intent to



**Exhibit 7**

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*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

LOURDES MATSUMOTO, NORTHWEST	)	Case No.: 1:23-
ABORTION ACCESS FUND, and INDIGENOUS	)	CV-00323-DKG
IDAHO ALLIANCE,	)	
	)	DECLARATION OF
<i>Plaintiffs,</i>	)	IRIS ALATORRE
	)	
v.	)	
	)	
RAÚL LABRADOR, in his capacity as the Attorney	)	
General for the State of Idaho,	)	
	)	
<i>Defendant.</i>	)	

I, Iris Alatorre, declare and state as follows:

1. I am older than 21 years of age. I have personal knowledge of the facts contained in this declaration, and am competent to testify about them.
2. The statements herein are true and correct.
3. I am the program manager of the Northwest Abortion Access Fund (“NWAAF”).
4. In this role, I oversee and support case managers who coordinate assistance for individuals seeking access to abortion care in states where such care is lawful.
5. NWAAF is a non-profit entity comprised of a working board, paid staff, and trained volunteers.
6. NWAAF provides emotional, financial, logistical, practical, and informational assistance to those who may become pregnant and need or choose to consider abortion as an option.
7. This includes booking and paying for bus tickets, plane tickets, and rideshare services, and has included arranging for volunteer drivers. It also includes assistance with lodging,

food, and other logistical needs associated with obtaining abortion care, and connecting abortion seekers with an abortion doula for remote emotional support.

8. In the past, NWAAF volunteers—including volunteers in Idaho—have driven individuals, including minors, to abortion appointments, including across state lines when necessary.
9. In fact, when I was a NWAAF volunteer I drove an Idaho minor who needed abortion care to her appointment, which happened to be across state lines.
10. NWAAF—the only independent abortion fund serving the Pacific Northwest—operates in Idaho as well as in Washington, Oregon, and Alaska.
11. NWAAF has always provided its services to abortion seekers of all ages, including minors.
12. NWAAF recognizes that Idaho callers face additional and more complex barriers because they live in a state with a hostile political climate that does not allow them to exercise their choices around their reproductive health.
13. This makes it especially important to support Idahoans to convey solidarity and support.
14. The burden is even higher for Idaho minors, but we seek to treat all Idahoans equally.
15. Idaho Code § 18-623 seeks to criminalize our support for Idaho minors, which impacts our ability to do our work in line with our mission to support all Idahoans.
16. NWAAF used to drive Idaho adults or minors who needed to be transported in order to access abortion health care.
17. This generally happened when other modes of transport were not available to the caller.

18. We did this to make it possible for Idaho callers to reach practitioners andAND as to express our solidarity for the choices Idahoans make about their own bodies.
19. Idaho Code § 18-623 criminalized this behavior as regards Idaho minors.
20. NWAAF values the autonomy of each individual to make the reproductive choices that are right for them whether they are a minor or adult.
21. Therefore, NWAAF paused transporting all Idahoans, a decision we had to make to stay in alignment with our values and comply with the law.
22. We have assisted multiple pregnant Idaho minors to access lawful abortion care, sometimes in situations where one or more parents may or may not have been aware of the minors' pregnancies or abortions, and in circumstances where the minor's abortion appointment required travel to other states. I am aware of at least eight instances in the last five years where we assisted Idaho minors needing to travel for abortion care. In those instances, most were instances where the parent may not have been aware.
23. NWAAF does not believe one is more or less entitled to decide one's reproductive future based on parental involvement and it deliberately does not have policies that would require inquiry into parent involvement and certainly not policies requiring parental approval.
24. My organization and I wish to continue providing pregnant people throughout the region, including minors, with information regarding reproductive health care options, including abortion, without fear of criminal prosecution or imprisonment.
25. My organization and I would like to do so without concern about who else may know or approve of a minor's decision to obtain abortion.

26. Forcing myself and my organization to convey a message to a young person that a minor's abortion decisions are less valid without parental involvement is contrary to our values and deeply held beliefs.
27. Idaho Code § 18-623, the so-called "Abortion Trafficking" statute in Idaho directly impacts the mission and the work of NWAAF.
28. NWAAF, and staff members including myself, wish to continue funding legal, out-of-state abortions for pregnant minor Idahoans (i.e., including directly paying and/or reimbursing out-of-state licensed providers of abortion services and providing financial aid to pregnant Idahoans for that purpose) without the legal requirement of seeking or obtaining consent from any parent or guardian.
29. NWAAF, and staff members including myself, wish to continue providing practical support (such as organizing and funding transportation and lodging) to pregnant minor Idahoans for obtaining legal, out-of-state abortions.
30. NWAAF, and staff members including myself, wish to restart transporting pregnant minor Idahoans who ask for us to drive them to out-of-state licensed providers of safe, legal abortion and accompanying those who want the support of a trusted adult on their journey.
31. All of the actions we have taken, and wish to continue taking, rely on the financial support we receive from donors. NWAAF's donors contribute to our organization because they believe in and want to support our work ensuring that individuals in our region, including minors, are able to access abortion care, if that is the choice they make. Our donors contribute to our organization with the knowledge that when we have supported

pregnant minors, including pregnant minors in Idaho, access abortions, we do not know if that minor's parents or guardian did or did not consent to the abortion.

32. NWAAF's continued ability to fulfill our mission and attract donors depends on our continued ability to support (financially, logistically and otherwise) pregnant people to access abortion care, including pregnant minors in Idaho, even if others disagree with their choice.
33. Our work also relies on the support we have from values-aligned volunteers, who work with us specifically to support our mission of ensuring that all persons, including minors in Idaho, are able to access the full range of reproductive options, including abortion care.
34. Idaho Code § 18-623 is so vague that neither NWAAF, nor I, are certain of which of our usual activities and statements would run afoul of the law.
35. The term "procure" in Idaho Code § 18-623 is vague, confusing, ambiguous, and illogical as applied to the work we do at NWAAF. Is paying for an abortion procuring that abortion if the funds are pledged before an abortion and provided after? Is it procuring by "recruiting" if we give a young person the information they need to find care, and they find that care? If NWAAF provides a gas card that a young person needs for the drive, was that procuring by recruiting? If a caller talks through their travel plans with a volunteer and the volunteer gives them affirmation is that recruiting?
36. I am the one who has to answer the questions that case managers have on their shifts. I find this statute confusing, ambiguous, and illogical in the context of our daily work.

37. NWAAF wants to develop and share a zine with abortion seekers across the region with information and cartoons. Will that be seen as recruiting or targeting minors? Must we not distribute that zine in Idaho?
38. The term “harbor” in I.C. 18-623 is confusing to us too. From the decisions in the case to date it seems it does not cover our booking of hotels or paying for accommodations on the trip, but what if the room is booked under a volunteer’s name because the traveler is a minor?
39. The phrase “intent to conceal” in Idaho Code § 18-623 is confusing to me. We believe that a pregnant person has full control over who to tell or not to tell. We are vocal about this. We don’t think that is an intent to conceal, but in some cases we know that, but for our assistance, a minor may need to tell a parent, and that doing so may not be safe. Is our providing assistance with this knowledge sufficient to show an intent to conceal? How does one procure, recruit, transport, or harbor with an intent to conceal?
40. Most often, the pregnant minors that we work with have the support of their parents in their abortion decisions, even when or if access to funds or broader economic circumstances remain as obstacles.
41. We also understand that parental involvement in a minor’s abortion decision is not always possible or safe or could lead to stigma, isolation, trauma, delay, or abuse.
42. Due to NWAAFs public statements and actions, we expect that minors, including minors in Idaho, will continue to seek our information and our support for help obtaining abortions.

43. Because we are committed to this and believe strongly in this mission, we want to continue to provide all of our usual services to pregnant people and minors, including pregnant people and minors in the state of Idaho without the threat of criminal prosecution.
44. We sometimes set up informational tables at community or public events, where our staff or volunteers share details about our mission and our values, provide information about our work, and request donations to continue to improve access to abortion.
45. We have done this, and want to continue to do so, as a show of support and solidarity with pregnant minors; to let them and to let the community at large know that they are not alone.
46. Without relief from this court, NWAAF's ability to speak about abortions, including speaking with Idaho minors who contact us, in accordance with our mission and with my own personal beliefs, will be irreparably harmed.
47. Without relief from this court, the ability of NWAAF to act in accordance with our mission and beliefs, will be irreparably harmed. These actions include, but are not limited to, providing financial, transportation and logistical assistance to pregnant Idaho minors seeking legal abortions, with or without the knowledge or consent of their parents or guardians.
48. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: 4/13/26

*Iris Alatorre*  
Iris Alatorre

# Exhibit 8

# Exhibit 8

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

LOURDES MATSUMOTO, NORTHWEST  
ABORTION ACCESS FUND, and INDIGENOUS  
IDAHO ALLIANCE,

*Plaintiffs,*

v.

RAÚL LABRADOR, in his capacity as the Attorney  
General for the State of Idaho,

*Defendant.*

) Case No.: 1:23-CV-  
) 00323-DKG  
)  
) DECLARATION OF  
) DARA SNYDER  
)  
)  
)  
)  
)  
)  
)

I, Dara Snyder, declare and state as follows:

1. I am older than 21 years of age. I have personal knowledge of the facts contained in this declaration, and I am competent to testify about them.
2. I am now, and at all times pertinent to this Declaration, have been a resident of the State of Oregon.
3. The statements within this Declaration are within my personal knowledge, and are true and correct.
4. I am the executive director of the Northwest Abortion Access Fund (“NWAAF”).
5. NWAAF is a non-profit entity comprised of a working board, paid staff, and trained volunteers.
6. NWAAF provides emotional, financial, logistical, practical, and informational assistance to those who may become pregnant and need or choose to consider abortion as an option.
7. Idaho’s political and legal landscape has a direct effect on the operations of our organization.
8. Idaho’s political and legal landscape impact our large volunteer base, our donor community, and the assistance we provide to individuals seeking abortion care.
9. One of the core functions at the heart of NWAAF is to send a message in communities that abortion is lawful health care and that people deserve the freedom and support necessary to exercise their reproductive autonomy.
10. NWAAF’s mission is to fund abortion and break down barriers to abortion access.
11. Our stated values emphasize autonomy, reproductive justice, and respect for individuals’ decisions about their bodies and lives.

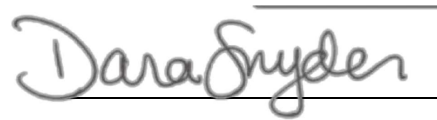
DECLARATION OF DARA SNYDER

12. We seek to shift culture and public understanding about abortion, advancing our belief that abortion should be normalized and seen as part of ordinary, regular, and necessary health care and to break down barriers to abortion access, including when those barriers are caused by social stigma over abortion.
13. The practical support and funding that NWAAF offers pregnant people is a practical expression of the messages NWAAF seeks to send, in the political climate present in Idaho: that abortion care is legitimate, necessary health care, and that individuals seeking it deserve dignity, compassion, and community support.
14. By paying clinics directly for abortion care, arranging transportation to appointments, and providing lodging for those traveling to obtain abortions, NWAAF publicly manifests our commitment to reproductive autonomy.
15. We believe that abortion access should be facilitated rather than obstructed.
16. Observers—including patients, volunteers, and the public—readily understand this conduct as an expression of solidarity with people seeking abortions and as an affirmation that abortion care should be accessible and supported.
17. Our funding decisions, the way we coordinate travel, and the ways we render assistance for housing or lodging are the mechanisms through which we communicate and advance that message.
18. We believe that our activities embody and convey our core message that individuals should be free to decide whether to continue a pregnancy and should be able to receive support and affirmation in exercising that autonomy. We undertake funding, transportation coordination, and lodging assistance to convey messages of solidarity, as well.

19. At public and community events and gatherings across the states we serve in Pacific Northwest, we also regularly set up information tables where we share information about these services to anyone who needs them, and with any other interested members of the public.

I swear (or affirm) that the foregoing Declaration is true and correct.

Executed on: 4/8/26  
\_\_\_\_\_  
(Date)

  
\_\_\_\_\_  
Dara Snyder

**Exhibit 9**

**Exhibit 9**

In The Matter of:

Lourdes Matsumoto, Northwest Abortion  
Access Fund, and Indigenous Idaho Alliance

v.

Raul Labrador, in his capacity as the  
Attorney General of the State of Idaho

**DEPOSITION OF  
IRIS ALATORRE  
February 06, 2026**



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LOURDES MATSUMOTO vs RAUL LABRADOR  
ALATORRE, IRIS 02/06/2026

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

LOURDES MATSUMOTO, NORTHWEST	)	
ABORTION ACCESS FUND, and	)	
INDIGENOUS IDAHO ALLIANCE,	)	Case No.
	)	1:23-cv-00323-DKG
Plaintiffs,	)	
	)	
vs.	)	
	)	
RAUL LABRADOR, in his capacity as	)	
the Attorney General of the State	)	
of Idaho,	)	
	)	
Defendant.	)	
_____	)	

REMOTE DEPOSITION OF IRIS ALATORRE

February 6, 2026

Reported by:  
Rebecca Martin, CSR #1108, RPR, CRR

1 REMOTE DEPOSITION OF IRIS ALATORRE

2

3 BE IT REMEMBERED that the remote deposition of  
4 IRIS ALATORRE was taken via videoconference by the  
5 Defendant before Treasure Valley Reporting, Rebecca  
6 Martin, Court Reporter and Notary Public in and for the  
7 State of Idaho, on Friday, the 6th day of February,  
8 2026, commencing at the hour of 10:00 a.m. Mountain Time  
9 in the above-entitled matter.

10

11

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1     **Appearances (Cont.)**

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1 estimate.

2 Q. (BY MR. GREEN) Is it fewer than 50?

3 MS. OLSON: Objection; form.

4 THE WITNESS: Yes.

5 Q. (BY MR. GREEN) Is it fewer than 20?

6 MS. OLSON: Objection; form.

7 THE WITNESS: I don't know, probably.

8 Q. (BY MR. GREEN) Okay. Is it fewer than  
9 15?

10 MS. OLSON: Objection; form.

11 THE WITNESS: I don't know.

12 Q. (BY MR. GREEN) Okay. So but probably  
13 fewer than 20 in any event?

14 MS. OLSON: Objection; form.

15 THE WITNESS: Yes.

16 Q. (BY MR. GREEN) Okay. Do you remember  
17 what -- when you've assisted these minors -- strike  
18 that.

19 What is the most recent case involving  
20 an Idaho minor that you recall handling?

21 A. That I can recall handling where I  
22 personally supported the minor?

23 Q. Yes.

24 A. Honestly I can't recall, like, a  
25 timeframe.

1 Q. Was it within the last year?

2 A. No.

3 Q. Within the last two years?

4 A. I think the last time I can recall

5 supporting -- me directly supporting an Idaho minor  
6 was in 2019 -- or sorry, 2020.

7 Q. Do you recall what assistance you  
8 provided?

9 A. Yes.

10 Q. What did you provide?

11 A. Procedure funding and a ride to and from  
12 her appointment.

13 Q. And when you say "a ride to and from her  
14 appointment," do you mean paying for it?

15 A. No. I drove her to her appointment and  
16 then drove her home. Or actually, I drove her  
17 home. I paid for a bus ticket for her to get to  
18 her appointment.

19 Q. Do you recall in 2020 whether or not you  
20 intended to conceal that abortion from the minor's  
21 parents?

22 MS. OLSON: Objection; form, foundation.

23 THE WITNESS: I don't ever intend to conceal  
24 anything from somebody, so no.

25 Q. (BY MR. GREEN) In any circumstance where



**Exhibit 10**

**Exhibit 10**

In The Matter of:

Lourdes Matsumoto, Northwest Abortion  
Access Fund, and Indigenous Idaho Alliance

v.

Raul Labrador, in his capacity as the  
Attorney General of the State of Idaho

**DEPOSITION OF  
DARA SNYDER  
February 17, 2026**



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LOURDES MATSUMOTO vs RAUL LABRADOR  
SNYDER, DARA 02/17/2026

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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

LAURDES MATSUMOTO, NORTHWEST )  
ABORTION ACCESS FUND, and )  
INDIGENOUS IDAHO ALLIANCE, )

Plaintiffs, )

vs. )

RAUL LABRADOR, in his )  
capacity as the Attorney )  
General of the State of )  
Idaho, )

Defendant. )

Case No.  
1:23-cv-00323-DKG

REMOTE DEPOSITION OF DARA SNYDER

February 17, 2026

Reported by:  
Vanessa S. Gosney, CSR, RPR, CRR

Page 10

1 positions doing social justice work.  
 2 Q. Okay. And who operated the abortion  
 3 clinic?  
 4 A. That was Planned Parenthood.  
 5 Q. And what was your role there?  
 6 A. I was a healthcare assistant.  
 7 Q. And how long did you do that for?  
 8 A. I think maybe two years.  
 9 Q. And then did you go to graduate school  
 10 immediately after that or did you do other work  
 11 between that and graduate school?  
 12 A. No, I went to school immediately after.  
 13 Q. And that was at Temple University?  
 14 A. Yes.  
 15 Q. And you said you got a Master's of  
 16 Social Work; is that right?  
 17 A. Correct.  
 18 Q. Okay. And what year did you graduate  
 19 with the Master's in Social Work?  
 20 A. I think it was 2007.  
 21 Q. And where did you go to work after that?  
 22 A. Well, after that I did a number of work  
 23 exchanges, but my next employed position was at  
 24 Lutheran Community Services providing crisis  
 25 alleviation services as the program director.

Page 11

1 Q. What do you mean by work exchange  
 2 services?  
 3 A. I wasn't paid a salary. I was giving my  
 4 labor and in return I was given room and board.  
 5 Q. Okay. So Lutheran -- you said Lutheran  
 6 county services or community services?  
 7 A. Community.  
 8 Q. Okay. And where was that at?  
 9 A. Delaware.  
 10 Q. And what were you doing for them?  
 11 A. I was the program director overseeing  
 12 emergency food, clothing, and housing assistance  
 13 operations.  
 14 Q. And how long did you do that for?  
 15 A. I believe it was three years.  
 16 Q. And where did you go to work after that?  
 17 A. I worked at a domestic violence shelter  
 18 in Portland, Oregon.  
 19 Q. How long did you do that for?  
 20 A. About six months.  
 21 Q. And what was your role there?  
 22 A. I was the shelter -- I was the advocacy  
 23 center coordinator. So I coordinated and helped  
 24 survivors access different resources to find  
 25 safety.

Page 12

1 Q. And where did you go after that?  
 2 A. The YWCA.  
 3 Q. And what were you doing for the YWCA?  
 4 A. I was the social justice program manager  
 5 doing community organizing, organizing public  
 6 events, raising awareness around different social  
 7 justice issues. Training and education in public  
 8 and private spaces around issues of diversity,  
 9 equity, and inclusion, and some policy advocacy.  
 10 Q. And how long did you do that for?  
 11 A. Six years.  
 12 Q. And what were the years you were at  
 13 YWCA?  
 14 A. Well, I left in 2020, so maybe 2014 to  
 15 2020.  
 16 Q. Okay. And where did you go after that?  
 17 A. I was the -- I went to Sisters of the  
 18 Road.  
 19 Q. What is Sisters of the Road?  
 20 A. It's a food justice organization based  
 21 in Portland that supports people who are in extreme  
 22 poverty.  
 23 Q. And what were you doing for them?  
 24 A. I was the executive director.  
 25 Q. How long did you do that for?

Page 13

1 A. It was two or three years. I think two.  
 2 Q. Okay. So that would be from about 2020  
 3 through 2022?  
 4 A. Yes.  
 5 Q. And where did you go after that?  
 6 A. That's when I was doing the -- I was  
 7 just doing independent contracting for about a year  
 8 before I started at the abortion fund where I am  
 9 now.  
 10 Q. Okay. All right. Let's talk about  
 11 NWAAF.  
 12 What is it?  
 13 A. I will refer to it as NWAAF, and it is  
 14 an abortion fund which provides financial,  
 15 logistical, and emotional support to people seeking  
 16 or considering abortions.  
 17 Q. Does it have, like, a formal mission  
 18 statement or anything like that?  
 19 A. Yes. The mission is to break down -- to  
 20 fund abortion and break down barriers to abortion  
 21 in the Pacific Northwest.  
 22 Q. How is the fund organized?  
 23 MS. OLSON: Objection. Form.  
 24 You can answer.  
 25 THE WITNESS: I'm not sure I understand the

Page 18

1 consider to be your region?  
 2 A. Alaska, Idaho, Oregon, and Washington.  
 3 Q. Do you know approximately how many  
 4 volunteers are located in Alaska?  
 5 A. No, I do not.  
 6 Q. Do you know approximately how many are  
 7 located -- yeah, physically located in Idaho?  
 8 A. No, I do not.  
 9 Q. Okay. What about Oregon or Washington?  
 10 A. No, I do not.  
 11 Q. So you mentioned that most of your  
 12 volunteers are case managers on the helpline. I  
 13 want to talk about that a little bit.  
 14 What does that mean? What does a case  
 15 manager on a helpline do?  
 16 A. They assist with the financial,  
 17 logistical, and emotional support services that we  
 18 provide. I think that there are different types of  
 19 volunteers: Some who assist with the emotional  
 20 support, others assist with the financial  
 21 assistance, and a third category, like, those are  
 22 three types of case manager roles.  
 23 Q. So tell me a little bit about the  
 24 helpline. What is the helpline and what do you do  
 25 on the helpline?

Page 19

1 MS. OLSON: Objection. Form.  
 2 You can answer.  
 3 THE WITNESS: Thank you.  
 4 The helpline is a toll free number that  
 5 people can call and leave a message at and then  
 6 someone gets back to the caller within a 24- or  
 7 48-hour period and talks over their situation,  
 8 their needs. I haven't worked directly on the  
 9 helpline nor been trained in it, so I can't really  
 10 speak to the specifics, but I understand that  
 11 there's an intake where we're collecting some  
 12 essential information to determine what kinds of  
 13 support this caller could benefit from.  
 14 Q. BY MR. CRAIG: When somebody calls the  
 15 helpline, do they always leave a message or do you  
 16 have people who answer that live and talk to them  
 17 live?  
 18 MS. OLSON: Objection. Form. Foundation.  
 19 You can answer, if you know.  
 20 THE WITNESS: That's always a message if  
 21 they call. I think that there might be  
 22 occasionally people e-mail us, but that's not a,  
 23 kind of, advertised way that we promote our  
 24 services.  
 25 Q. BY MR. CRAIG: So who returns the phone

Page 20

1 call? Is it volunteers, is it paid staff, or is it  
 2 some mix of the two?  
 3 MS. OLSON: Objection. Form.  
 4 You can answer.  
 5 THE WITNESS: I would be speculating.  
 6 Q. BY MR. CRAIG: Do any of your paid staff  
 7 return the phone calls?  
 8 A. I don't know if the program manager does  
 9 from time to time, but he's the only one who would.  
 10 Q. So then all the other phone calls would  
 11 be returned by volunteers?  
 12 A. Yes.  
 13 Q. And could they be returned by any  
 14 volunteer in any of the states in your region?  
 15 MS. OLSON: Objection. Form. Foundation.  
 16 You can answer, if you know.  
 17 THE WITNESS: Could you restate the  
 18 question?  
 19 Q. BY MR. CRAIG: Sure. So the volunteers  
 20 that return the phone calls, could they be located  
 21 in any of the states in your region?  
 22 MS. OLSON: Objection. Form. Foundation.  
 23 THE WITNESS: Yes. Except in the case of  
 24 supporting Idaho minors where we do not have any  
 25 volunteers based in Idaho supporting those cases.

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1 Q. BY MR. CRAIG: And why is that?  
 2 A. That's as a result of this statute.  
 3 Q. And when you say "this statute," what do  
 4 you mean?  
 5 A. The legislation that was put forward  
 6 that we filed a complaint against.  
 7 Q. Okay. Are you referring to the abortion  
 8 trafficking statute Idaho Code 18-623?  
 9 MS. OLSON: Objection. Form. Foundation.  
 10 THE WITNESS: I believe so. I don't know  
 11 the statute number offhand.  
 12 Q. BY MR. CRAIG: Okay. Is it the abortion  
 13 trafficking statute, to your recollection?  
 14 MS. OLSON: Objection. Form. Foundation.  
 15 THE WITNESS: It's the one regarding  
 16 recruiting, harboring, and transporting minors in  
 17 Idaho.  
 18 Q. BY MR. CRAIG: So when did you -- let me  
 19 rephrase.  
 20 Is that a formal policy that you guys  
 21 implemented at some point?  
 22 MS. OLSON: Objection. Form. Foundation.  
 23 You can answer.  
 24 THE WITNESS: Yes, it is.  
 25 Q. BY MR. CRAIG: And when did you

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1 THE WITNESS: Could you explain what you  
2 mean by "recruit"?

3 Q. BY MR. CRAIG: Let me ask you, how do  
4 you think of recruit? When I ask you recruit, what  
5 does that mean to you?

6 MS. OLSON: Objection. Form.

7 THE WITNESS: I think it means, you know,  
8 being out in public and convincing or trying to get  
9 people to sign up for a particular service.

10 Q. BY MR. CRAIG: Okay. So using that  
11 definition, are you aware of any situation where an  
12 NWAAF employee or volunteer has recruited a minor  
13 within Idaho to procure an abortion?

14 A. Could you explain what you mean by  
15 "procure"?

16 Q. I will turn it around and ask you the  
17 same thing. When I use the term "procure," how do  
18 you interpret that? What does that mean to you?

19 MS. OLSON: Objection. Form.

20 THE WITNESS: This word is not in my  
21 lexicon.

22 Q. BY MR. CRAIG: So you don't know what  
23 the term "procure" means?

24 A. No.

25 Q. So to help them obtain an abortion,

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1 let's use that instead then.

2 Are you aware of any situation where  
3 NWAAF employees or minors [sic] have recruited a  
4 minor within the State of Idaho to help them obtain  
5 an abortion?

6 MS. OLSON: Objection. Form.

7 THE WITNESS: No.

8 Q. BY MR. CRAIG: Does NWAAF pay for  
9 abortion-inducing drugs for people?

10 MS. OLSON: Objection. Form. Foundation.

11 THE WITNESS: Yes.

12 Q. BY MR. CRAIG: Does NWAAF mail those to  
13 people or do they just provide reimbursement for  
14 it?

15 MS. OLSON: Objection. Form.

16 THE WITNESS: We would provide the financial  
17 assistance.

18 Q. BY MR. CRAIG: And would that be to the  
19 provider who mails the drugs or to the person who  
20 obtains the drugs?

21 A. Yes, the provider.

22 Q. And are you aware of any situation where  
23 NWAAF has paid for abortion-inducing drugs for a  
24 minor within Idaho?

25 A. No, I'm not.

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1 MR. CRAIG: Okay. I think I might be done,  
2 but if we could take a five-minute break before I  
3 formally rest just so I can go over my notes. So  
4 we will come back in five minutes and then, Wendy,  
5 I will likely rest when we come back, but I just  
6 want to go over my notes real quick.

7 MS. OLSON: Do we want to take a longer  
8 break, because we will have some questions.

9 MR. CRAIG: Yeah, that's fine. Ten,  
10 minutes, 15?

11 MS. OLSON: 15, so 2:15-ish.

12 (Break taken from 1:58 p.m. to 2:18 p.m.)

13 MR. CRAIG: I will rest. I don't have any  
14 other questions. Thank you.

15 MS. OLSON: All right. Ms. Snyder, I have a  
16 few questions for you.

17

18 EXAMINATION

19 BY MS. OLSON:

20 Q. Do you recall Mr. Craig asking you  
21 questions about whether there was a written policy  
22 and when it was implemented regarding having  
23 volunteers in Idaho return calls or staff calls  
24 back to Idaho minors?

25 A. Yes.

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1 Q. And I think you testified that that  
2 policy came into place after you became the  
3 executive director; is that correct?

4 A. Yes.

5 Q. And Ms. Snyder, is it possible that  
6 there was an informal policy or practice to that  
7 same effect prior to the time that you became the  
8 executive director?

9 A. Yes. It might just not have come to my  
10 attention until, you know, after I was hired.

11 Q. Ms. Snyder, do you recall questions --  
12 do you recall whether Mr. Craig asked you any  
13 questions about social services on the website?

14 A. Not with that specific language.

15 Q. Okay. So any questions that you  
16 responded to, you did not understand the word  
17 "social services" to be used; is that correct?

18 A. No, I did not.

19 Q. So it's correct that you did not  
20 understand that term to be used; is that right?

21 A. Yes, I did not hear the word "social  
22 services."

23 Q. Okay. Thank you for clarifying that.  
24 Sometimes when we get double negatives it is a  
25 little harder to track.

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1 When you were talking about the manner  
 2 in which -- responding to questions about the  
 3 manner in which NWAAF would provide information  
 4 regarding its services, you talked about being at  
 5 events and providing information at events.  
 6 What is the platform or the way that you  
 7 would do that at events?  
 8 A. We often table at community events or  
 9 even private events if we were requested.  
 10 Q. What does it mean to table at an event?  
 11 A. Often to have a physical table upon  
 12 which we would put our outreach materials with  
 13 information about the supports that we can provide,  
 14 and there is a person, staff or volunteer, who is  
 15 trained to do community outreach and provide  
 16 information about those services, also through  
 17 verbal conversation.  
 18 Q. And Ms. Snyder, you recall Mr. Craig  
 19 asking you questions about whether NWAAF engages in  
 20 what he used the term "recruiting" and then you had  
 21 a back and forth about what he meant by that and  
 22 what you meant by that? Do you recall those  
 23 questions?  
 24 A. Yes.  
 25 Q. All right. Ms. Snyder, does NWAAF

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1 provide information, advice, education, support,  
 2 assistance, resources to individuals who call in on  
 3 its helpline regarding the abortion services,  
 4 support services that NWAAF provides?  
 5 MR. CRAIG: Object to form.  
 6 THE WITNESS: Yes.  
 7 Q. BY MS. OLSON: You can answer.  
 8 A. Yes, we do.  
 9 Q. And do those services that were just  
 10 included in my question and that you indicated you  
 11 provide, do you also provide those services to  
 12 Idaho minors if they are the persons who have  
 13 called in on your helpline?  
 14 MR. CRAIG: Object to form.  
 15 Q. BY MS. OLSON: You can answer.  
 16 A. We provide those services to anyone who  
 17 calls.  
 18 Q. Including if the person who's called in  
 19 is a minor from Idaho, would you provide those  
 20 services to the minor from Idaho?  
 21 A. Yes.  
 22 Q. And does NWAAF provide practical and  
 23 financial assistance to individuals who have called  
 24 in on its helpline or its hotline regarding  
 25 abortion services?

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1 MR. CRAIG: Object to form.  
 2 THE WITNESS: Yes.  
 3 Q. BY MS. OLSON: You can answer.  
 4 A. Yes.  
 5 Q. And does NWAAF include, if it's an Idaho  
 6 minor who has called in, does NWAAF provide  
 7 practical and financial assistance to that Idaho  
 8 minor?  
 9 MR. CRAIG: Object to form.  
 10 THE WITNESS: Yes.  
 11 Q. BY MS. OLSON: Because they have called  
 12 in just like anyone else; is that correct?  
 13 MR. CRAIG: Object to form.  
 14 THE WITNESS: That's correct.  
 15 Q. BY MS. OLSON: I'm sorry, just to make  
 16 sure. I know that Mr. Craig is going to have an  
 17 objection, but I think he was talking over the top  
 18 of you.  
 19 Is it correct that NWAAF would provide  
 20 those same services to an Idaho minor if it was an  
 21 Idaho minor who called in?  
 22 MR. CRAIG: Object to form.  
 23 THE WITNESS: Yes.  
 24 Q. BY MS. OLSON: All right. And does  
 25 NWAAF also provide the emotional assistance and

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1 emotional support services that you have described  
 2 to Idaho minors if it's an Idaho minor who has  
 3 contacted NWAAF?  
 4 MR. CRAIG: Object to form.  
 5 THE WITNESS: Yes.  
 6 Q. BY MS. OLSON: And with respect to that  
 7 tabling activities and the providing of information  
 8 that you have just described and that, sort of,  
 9 education and use of the word "abortion" in the way  
 10 you described earlier, would you provide that kind  
 11 of information to Idaho minors if they were at an  
 12 event or at one of the places where you make that  
 13 information available?  
 14 MR. CRAIG: Object to form.  
 15 THE WITNESS: We would provide that  
 16 information to anyone at the event.  
 17 Q. BY MS. OLSON: All right. And then,  
 18 Ms. Snyder, do you recall Mr. Craig asking you  
 19 questions about a document they called "Exhibit 1"?  
 20 A. Yes.  
 21 Q. All right. I am going to hopefully  
 22 share that same document that -- the document that  
 23 was sent to counsel, of course, doesn't have the  
 24 exhibit sticker on it. I'm not sure if the one  
 25 that was put up on the screen does either. But I

1 A. No.

2 MR. CRAIG: All right. Thank you. I don't

3 have any other questions.

4 MS. OLSON: All right. I am going to lodge

5 an objection to the manner in which Mr. Craig

6 concluded this deposition. He misled counsel and

7 the witness regarding having finished his

8 deposition and he continued to ask questions that

9 were outside the scope.

10 We will read and sign.

11 MR. CRAIG: Okay. You can lodge that

12 objection. I obviously disagree with you.

13 At this point I don't have any other

14 questions and I don't see a need to keep the

15 deposition open. She answered the question I was

16 asking. Thank you.

17

18 (Deposition Concluded at 2:33 p.m.)

19 \* \* \*

20 (Signature was requested.)

21

22

23

24

25

1 REPORTER'S CERTIFICATE

2

3 STATE OF IDAHO )  
 ) ss.  
4 COUNTY OF ADA )

5 I, VANESSA S. GOSNEY, Certified Shorthand Reporter

6 and Notary Public in and for the State of Idaho, do

7 hereby certify:

8 That prior to being examined, the witness named in

9 the foregoing deposition was by me duly sworn to testify

10 to the truth, the whole truth and nothing but the truth;

11 That said deposition was taken down by me in

12 shorthand at the time and place therein named and

13 thereafter reduced to typewriting under my direction,

14 and that the foregoing transcript contains a full, true

15 and verbatim record of said deposition.


16 I further certify that I have no interest in the


17 event of the action.

18 WITNESS my hand and seal this 2nd day of March,

19 2026.

20

21 

22 

23 VANESSA S. GOSNEY

24 RPR and Notary

25 Public in and for the  
State of Idaho.

My Commission Expires: 10-29-31

