

# EXHIBIT 2

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

PRIESTS FOR LIFE, *et al.*,

Plaintiffs,

-v-

DEPARTMENT OF HEALTH AND HUMAN  
SERVICES, *et al.*,

Defendants.

Case No. 1:13-cv-01261-EGS

**DECLARATION OF DR. ALVEDA  
KING**

I, Dr. Alveda King, make this declaration pursuant to 28 U.S.C. § 1746 and based on my personal knowledge.

1. I am an adult citizen of the United States and a plaintiff in this case.
2. I am a full-time employee of Priests for Life, and I am currently the Pastoral Associate and Director of African-American Outreach for Priests for Life. I am also a voice for the Silent No More Awareness Campaign, which is the world's largest mobilization of women and men who have lost children to abortion, sharing my testimony of two abortions, God's forgiveness, and healing.
3. I am covered under Priests for Life's health care plan, which, upon information and belief, is an "employer-sponsored" plan under the Patient Protection and Affordable Care Act. If Priests for Life were forced out of the health care market, I would be forced to purchase a costly, individual insurance plan as a result of the "individual mandate" provision of the Act. This individual health care plan will necessarily include the immoral "contraceptive services" coverage because, as I understand it, the mandate applies to individual plans.
4. Through my association with Priests for Life, I engage in various expressive activities to advance and promote Priests for Life's religious mission, which includes, at its core,

spreading the Gospel of Life. This activity is a religious exercise for me, as I am called by my faith to evangelize and spread the Gospel of Life.

5. The Gospel of Life, which is an expression of the Christian position and central teaching regarding the value and inviolability of human life, affirms and promotes the culture of life and actively opposes and rejects the culture of death. Contraception, sterilization, abortifacients, and abortion are all instruments of the culture of death, and their use can never be approved, endorsed, facilitated, promoted, or supported in any way.

6. To advance the mission of Priests for Life and, ultimately, the mission of the Church, I often use the media of television, radio, and the printed press to promote the culture of life.

7. I am the niece of civil rights leader Martin Luther King, Jr. As someone who has witnessed firsthand and up close the civil rights movement in this country, I firmly believe that the contraceptive services mandate is an affront to civil rights. Efforts to control the population always target minority and lower-income groups. Indeed, there are racist and eugenic roots to policies and programs that promote contraceptive services, such as the federal government's mandate at issue here.

8. I strongly object to the federal government forcing Priests for Life, the organization with which I associate and through which I tirelessly work to build the culture of life, to provide or facilitate, whether directly or indirectly, any support for, or access to, contraception, sterilization, and abortifacients and related education and counseling based on my sincerely held religious beliefs. Further, I strongly object to the federal government forcing Priests for Life to facilitate, support, or cooperate in any way with the government's immoral objective of promoting the use of contraceptive services—an objective that is squarely at odds

with my religious beliefs and which directly undermines the very work that I do.

9. As the Pastoral Associate and Director of African-American Outreach for Priests for Life, I, along with my associates, including Father Pavone and Janet Morana, travel the country full time to meet with priests, pro-life groups, and others to express, teach, and spread the Gospel of Life.

10. As a Christian organization, Priests for Life has a moral and religious obligation to resist and oppose actions designed to advance and promote the use of contraceptive services. As such, Priests for Life cannot submit to any requirements imposed by the federal government that will promote the use of contraceptive services, including any requirement to provide a “self-certification” to its insurer that will then trigger the insurer’s obligation to make “separate payments for contraceptive services directly for plan participants and beneficiaries” of Priests for Life’s health care plan.

11. Pursuant to its moral and religious obligations, Priests for Life cannot provide any notice or information to its insurer, its employees, or to the beneficiaries of its health care plan that is designed to promote or facilitate the use of contraceptive services.

12. Consequently, upon information and belief, by refusing to cooperate with, and thus facilitate, the government’s immoral contraceptive services scheme and objective and by further refusing to provide coverage in its health care plan for immoral contraceptive services and related education and counseling required by the mandate, all based on its sincerely held religious beliefs, Priests for Life will be subject to crippling fines of \$100 per day per employee. This will no doubt adversely affect the viability of Priests for Life as an organization, and thereby adversely affect me as a Pastoral Associate and Director, as an employee, and as an advocate for the culture of life.

13. I hold and actively profess religious beliefs that include traditional Christian teaching on the nature and purpose of human sexuality. In particular, in accordance with Pope Paul VI's 1968 encyclical *Humanae Vitae*, I believe that human sexuality has two primary purposes: to "most closely unit[e] husband and wife" and "for the generation of new lives." I believe and actively profess the Christian teaching that "[t]o use this divine gift destroying, even if only partially, its meaning and purpose is to contradict the nature both of man and of woman and of their most intimate relationship, and therefore it is to contradict also the plan of God and His Will." Therefore, I believe and teach that "any action which either before, at the moment of, or after sexual intercourse, is specifically intended to prevent procreation, whether as an end or as a means"—including contraception and sterilization—is a grave sin.

14. I believe, as Pope Paul VI prophetically stated in *Humanae Vitae*, that "man, growing used to the employment of anticonceptive practices, may finally lose respect for the woman and, no longer caring for her physical and psychological equilibrium, may come to the point of considering her as a mere instrument of selfish enjoyment, and no longer as his respected and beloved companion." Consequently, I believe and profess that the contraceptive services mandate harms women physically, emotionally, morally, and spiritually. Indeed, my personal experiences attest to the harm that the contraceptive services mandate will have on women.

15. When the chemical birth control given to me by Planned Parenthood gave me a blood clotting disorder called phlebitis, I was not immediately taken off the pill. Instead, they experimented with various dosages. I was also given a diaphragm and free condoms in an effort to prevent subsequent pregnancies. And I was given an IUD, which caused cervical damage. All the birth control failed me. The pills made me sick. The alternatives did not work. I got

pregnant anyway and ended up having two abortions as a result. I also had a miscarriage related to the harmful impact of my prior abortions and the chemical and invasive birth control methods I had used. I had to have cervical surgery, and the lingering impact of phlebitis remained through the years to remind me of the harmful impact of artificial contraception, such as those contraceptive services mandated by the federal government pursuant to the Affordable Care Act. I have since had a conversion of faith.

16. Pursuant to my Christian faith, I hold and actively profess religious beliefs that include traditional Christian teaching on the sanctity of life. I believe and teach that each human being bears the image and likeness of God, and therefore all human life is sacred and precious from the moment of conception. Consequently, I believe and teach that abortion, which includes abortifacients, ends a human life and is a grave sin.

17. Further, I subscribe to the Christian teaching about the proper nature and aims of healthcare and medical treatment. For example, I believe, in accordance with Pope John Paul II's 1995 encyclical *Evangelium Vitae*, that “[c]ausing death’ can never be considered a form of medical treatment,” but rather “runs completely counter to the health-care profession, which is meant to be an impassioned and unflinching affirmation of life.”

18. Based on my sincerely held Christian beliefs, I do not believe that contraception, sterilization, abortifacients, or abortion are properly understood to constitute medicine, healthcare, or a means of providing for the well-being of persons. Indeed, I believe these procedures involve gravely immoral practices.

19. Based on my sincerely held religious convictions, I am morally prohibited from cooperating, directly or indirectly, with evil. Thus, I strongly object to the federal government forcing Priests for Life to purchase a health care plan that provides its employees with access to

contraceptives, sterilization, and abortifacients, all of which are prohibited by my religious convictions. This is true whether the immoral services are paid for directly, indirectly, or even not at all by Priests for Life or me. Contraception, sterilization, and abortifacients are immoral regardless of their cost. And I strongly object to the government forcing me into a moral and economic dilemma with regard to my relationship with Priests for Life. Moreover, I strongly object to being forced by the government to facilitate, support, and promote the government's immoral objective of promoting the use of contraceptive services—an objective that is directly at odds with the mission and purpose of Priests for Life and with my sincerely held religious beliefs.

20. As a result of the contraceptive services mandate, the federal government is forcing Priests for Life out of the healthcare market because of its sincerely held religious beliefs, which is both a direct harm in and of itself and an indirect harm in that it will put Priests for Life at a competitive disadvantage vis-à-vis employers offering health care plans in the employee marketplace.

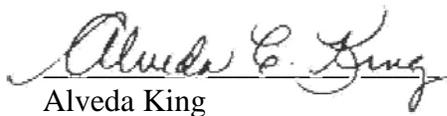
21. The current mandate with its limited religious employer exemption and so-called “accommodation” will force Priests for Life to either leave the market for health care services or pay crippling fines, either of which will adversely affect it as an organization, and thus adversely affect me both spiritually—in that it will harm my ability to spread the Gospel of Life—and financially. Many of Priests for Life's valued employees, without whom Priests for Life could not provide its much needed services, may be forced to leave Priests for Life and seek other employment that provides health care benefits. Indeed, the contraceptive services mandate threatens the very survival of Priests for Life as an effective, pro-life organization.

22. In sum, the contraceptive services mandate is causing Priests for Life and me to

feel economic and moral pressure today as a result of the federal government imposing substantial burdens on our religious beliefs and practices.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed on the 13th day of September, 2013.

  
Alveda King