

Exhibit Q

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

WHOLE WOMAN’S HEALTH, et al.,)	
)	
Plaintiffs,)	
)	CIVIL ACTION
v.)	
)	CASE NO. _____
AUSTIN REEVE JACKSON, et al.,)	
)	
Defendants.)	

**DECLARATION OF REVEREND DANIEL KANTER IN SUPPORT OF
PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT**

REVEREND DANIEL KANTER, declares under penalty of perjury that the following statements are true and correct:

1. I am the CEO and Senior Minister of the First Unitarian Church of Dallas (“First Church”).

2. First Church is a progressive cathedral of Unitarian Universalism. My congregation consists of 1,100 people in the Dallas-Fort Worth region across a 50-mile radius. The Church reaches 3,000 people in total through broadcasting to 37 states and 7 countries.

3. I submit this declaration in support of Plaintiffs’ Motion for Summary Judgment to prevent enforcement of Texas Senate Bill 8 (“S.B. 8”). The facts I state here and the opinions I offer are based on my training and experience as a licensed and ordained member of the clergy who has worked in Texas for the past 20 years.

My Background and Beliefs

4. I received my Doctorate in Ministry from the Perkins School of Theology at Southern Methodist University in 2007. I also received my Master’s Degree in Divinity from the

Starr King School for the Ministry in Berkeley, California and my B.A. in Psychology and Asian Area Studies from the University of Vermont.

5. I was ordained at King’s Chapel in Boston, Massachusetts in 1998, where I served as an Assistant Minister for three years.

6. I moved to Texas 20 years ago to be a sabbatical minister at First Church. I have been promoted over the years to Assistant Minister, Associate Minister, and now Senior Minister. I have served this Church as CEO and Senior Minister since January 2009.

7. As CEO and Senior Minister, I am responsible for all operations of the Church and its ministry. In my role as CEO, I design the strategic direction for the Church and its programs, manage our full-time employees, and serve as steward of our community. In my role as Senior Minister, I regularly preach to the congregation; provide pastoral care, such as the administration of rites of passage and officiation of burials and weddings; and oversee the educational programs of the Church.

8. My personal religious beliefs stem from the core principles of Unitarian Universalism. The core belief in Unitarian Universalism is the inherent dignity and worth of all living human beings. We believe that God is a loving God that loves us all, and our job is to live up to that ideal by making the world as loving, compassionate, and just as we can.¹

9. Because of these core tenets, I believe that pregnant people need to make decisions about their reproductive health—including decisions to have an abortion—for themselves. I believe that respect for the pregnant person’s dignity requires that we respect their choice. This is particularly important given that people seeking abortions often face challenging circumstances, including rape, abuse, and judgment from their loved ones.

¹ *The Seven Principles*, Unitarian Universalist Association, <https://www.uua.org/beliefs/what-we-believe/principles>.

10. I believe that just like any other person called to the ministry of the care of people, I am an agent of God on this Earth. My religious mission is to serve my parishioners and others I encounter with justice and compassion. I find fulfillment whenever I am supporting the dignity and worth of all people.

11. I also believe that every person who wants a confidential conversation with a member of the clergy before making decisions about their reproductive choices is entitled to that conversation. My dedication to providing pastoral care includes providing emotional and spiritual support to individuals and their families contemplating abortion. During my years as a Minister, I have provided confidential counseling to parishioners seeking guidance about unintended pregnancy, past abortions, and other reproductive decision-making.

History of First Church

12. First Church was founded in 1899 and has a long history of involvement in progressive causes—work that continues to this day. For instance, First Church advocated for school desegregation 20 years before any court-ordered school desegregation. The Church has spoken out for LGBT causes for 45 years and has worked on AIDS-related issues for years. Further, the Church itself has a history of providing comprehensive sex education for youth.

13. First Church also has a long history advocating for reproductive rights. As early as 1969, the Women’s Alliance at the Church began to work on abortion rights. After speaking with Virginia Whitehill, then a volunteer at Planned Parenthood, the Women’s Alliance formed a broad coalition to repeal Texas’s existing abortion ban. This coalition identified Norma McCorvey, the plaintiff who would be known as Jane Roe, and participated in an amicus brief submitted in the *Roe v. Wade* case.² First Church continues that coalition to this day, celebrating

² *Our History*, First Unitarian Church of Dallas, <https://www.dallasuu.org/history/>.

its history and continuing to move forward its advocacy. For example, First Church recently held a fiftieth anniversary event for *Roe v. Wade*, and has hosted numerous community events, inviting speakers like Cecile Richards to present to our congregation.

14. When I first came to First Church, its history was particularly salient to me in both my ministry and my involvement with the progressive religious community in Dallas. I have long preached about society's responsibility to preserve reproductive rights and justice, but these issues took on new meaning when I joined First Church. Over the years, I have become increasingly dedicated to the cause and expanded my own advocacy regarding my beliefs. I joined the Board for Planned Parenthood of North Texas and, later, the Board for Planned Parenthood of Greater Texas, on which I still serve. From 2017 to 2019, I was the Chair of the Clergy Advocacy Board for Planned Parenthood Federation of America.

15. For many years, I have also worked with the Texas Freedom Network, a non-partisan grassroots organization of more than 150,000 religious and community leaders who support civil rights and progressive causes like reproductive rights and justice. First Church is the first church that Texas Freedom Network designated as a reproductive justice congregation.

16. First Church's work in the community has not come without risks. Five years ago, for example, First Church was a target for harassment by anti-choice protesters called the Abolitionists, who launched a protest outside our Church during Sunday services. Carrying large signs and wearing body cameras, the group yelled at parishioners and their children, haranguing them for attending a church that "kills babies." The protesters' attempt to scare away my parishioners was, thankfully, unsuccessful. In fact, the Church gained new members because of that incident.

Southwestern's Chaplaincy Program

17. Pursuant to my beliefs, in 2017, I founded a Chaplaincy Program at Southwestern Women's Surgery Center ("Southwestern"), an abortion provider in Dallas. Through my work with First Church and my community in Dallas, I recognized the shame and stigma that accompanies reproductive decision-making and the lack of support that many Texans have during these important and tender moments in their lives. My goal in creating the Chaplaincy Program was to create a support network to be present with patients and their families making decisions about abortion to fill this spiritual gap. This work is an important part of my commitment to the human journey and to ensuring that all individuals have spiritual support in the moments in their life when they need compassion.

18. The Chaplaincy Program involves me, and other clergy members from various religious faiths, including Jews, Methodists, Presbyterians, and Disciples of Christ, providing individual counseling and emotional/spiritual support to patients and/or their families during their appointments at Southwestern. At the program's peak, we had 8-10 members of the clergy volunteering at Southwestern during shifts throughout the week.

19. I have personally counseled hundreds of patients through the Chaplaincy Program. I have counseled a wide range of patients over the years, including: anti-choice individuals seeking an abortion to save their lives; families struggling with fetal diagnoses; patients abused by their own families; anxious boyfriends and husbands waiting for their partners; and the full range of individuals who are attempting to create agency in their own lives. Our conversations have covered a wide range of topics. I have assured patients that God is not condemning them for their choices. I have answered religious questions and sat in prayer or meditation with patients and their families. My counseling has helped uncover abuse and other

important issues that enable Southwestern’s staff to provide the highest level of care to their patients.

20. Over the last several years, the Chaplaincy Program has served hundreds of patients and has been extremely well-received by both patients and clinic staff. Patients have been extremely thankful and have reported how important and meaningful the counseling we provide was to their experience at the clinic.

21. While the in-person Chaplaincy Program has been temporarily suspended during the COVID-19 pandemic, I have continued to be on-call for remote consultations with patients, and we intend to re-start in-person counseling when it is safe to do so.

The Impact of S.B. 8

22. I understand that S.B. 8 prohibits providing an abortion after the detection of “fetal heartbeat” and is therefore a six-week ban on abortions. The bill also makes it a violation to aid or abet an abortion after the detection of a “fetal heartbeat.”

23. I am personally opposed to S.B. 8 because it effectively outlaws the majority of abortions in Texas. My understanding is that at six weeks, many pregnant people do not know that they are pregnant. Thus, in practicality, S.B. 8 makes it impossible for the majority of Texans to discern and decide whether to carry or terminate a pregnancy. Patients will not be able to access a safe medical procedure and necessary healthcare.

24. Moreover, I am concerned that the religious counseling I provide to both my parishioners and to Southwestern’s patients through the Chaplaincy Program could subject me to lawsuits by individuals who say that I am “aiding and abetting” abortion. S.B. 8 appears to restrain what I—as a member of the clergy—can say to another human being and prevent me from providing the spiritual and emotional counseling that I am called by my religious beliefs to

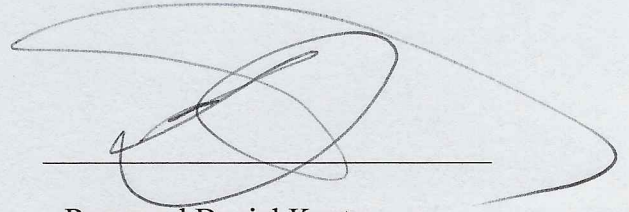
provide. I am deeply concerned that S.B. 8 violates my ability to be in a conversation with a patient and that patient's family on a pastoral issue—an ability which I thought was protected in this country as sacrosanct. If I cannot provide pastoral care consistent with my religious beliefs, I am not able to exercise my right to practice as a Minister.

25. Based on my experiences as a member of the clergy in Dallas for 20 years, I believe that S.B. 8 will have wide-ranging and harmful consequences, both for people like me and for the Texans who need abortion care. At a minimum, S.B. 8 will result in many unwanted pregnancies and many Texans denied the ability to make basic decisions about their reproductive lives. The bill will have very public consequences as well, forcing people further into poverty and derailing people's agency in their own lives. There will inevitably be a lot of emotional and spiritual trauma, as well as unnecessary pain and suffering, on the part of people forced to bring a pregnancy to term, whether that pregnancy is viable or not.

26. I refuse to let S.B. 8 or any other law interfere with my ability to practice my ministry. Although I am concerned with the financial consequences—which seem entirely punitive and arbitrary—I must be able to fully present myself in the ministry to which I have been called by God.

Dated:

7/10/21

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal line at the bottom, positioned above the printed name.

Reverend Daniel Kanter