

# Exhibit R

**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 ERIKA FORBES IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT**

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

1. I am a licensed, ordained minister and licensed spiritual counselor, located in Dallas, Texas.

2. I received my license and ordination as an Interfaith Minister from One Spirit Interfaith Seminary in New York City in 2006. I also received a Master’s Degree in World Religions from the same institution as well as a B.A. in Education from California State University, Hayward (n/k/a California State University, East Bay).

3. After obtaining my license and ordination, I moved to San Antonio and founded The Awakening Spiritual Community, a faith-based 501(c)(3) organization. I served as full-time Spiritual Director and Pastor for six years, creating a non-denominational spiritual community bound together by love rather than religion. We held Sunday services and amplified our messages through digital media. Through this community, I have worked with people of every

religious background and provided pastoral care for various life cycle events, including pregnancy and other reproductive choices.

4. Since leaving The Awakening Spiritual Community, I have continued to work as a minister and have given sermons before many congregations throughout Texas.

5. I also maintain a separate, private spiritual counseling practice. My clients are primarily pregnant people from all religious traditions, including no tradition. They come to me for prayer and support as they make pregnancy decisions or after their abortions. I have counseled over 200 pregnant people, more than half of whom are Texans.

6. I am also the State Faith and Outreach Manager for 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.

7. 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 and spiritual counselor who has worked in Texas for the last eight years.

### **My Personal Beliefs**

8. I have been an outspoken advocate for reproductive rights and justice for many years.

9. I believe that there is a greater divine presence—whether you call it God or a spirit or something else—that gives us the divine right to make the best choice for ourselves at any given time and that we alone are equipped with the right answers for the decisions we will make in our lives. This divine right includes the right to bodily autonomy, the right to thrive,

and, specifically, the right to obtain an abortion. I believe that in both scripture- and earth-bound traditions, God does not condemn the personal choice to end a pregnancy.

10. I believe that I have been called to help pregnant people, particularly people in Texas, realize their divine rights. Here in Texas, God has been taken hostage by those opposed to abortion. As a result, pregnant people have internalized shame and stigma around their abortion choices. I believe that it is my duty and responsibility to help people feel supported and trusted by a licensed and ordained member of the clergy while making choices about their bodies, particularly because this is a message they rarely hear from clergy. I believe that pregnant people in Texas need access to clergy that are supportive of their bodily autonomy.

11. My work as a spiritual counselor is particularly important because of who I am. I am a Black female minister, a mother, and a person who has had two abortions. It is rare to find a female member of the clergy like me. But this is exactly why pregnant people contemplating abortion seek my counsel.

12. Pregnant people who come to me for counseling need a variety of spiritual and emotional services to aid in their pregnancy decision. Many come to me to ask for permission from God for their abortion, for absolution of the guilt they feel, or for reassurance that they can make the choice that they already know is right for them. Clients who come to me after their abortions often seek relief from the shame and guilt they feel as a result of the stigma around abortion. For both types of clients, I use the clients' own religious tradition and texts to provide needed spiritual support.

13. Over the years, I have also become a vocal public advocate for abortion access in Texas. As a result, I have suffered from persistent digital harassment by those who oppose abortion.

## **The Effects of S.B. 8**

14. I understand that S.B. 8 is an abortion ban that will prohibit all pregnant people in the state of Texas from accessing abortion care once they are approximately six weeks pregnant. I also understand that anyone who assists with an abortion later than six weeks can be sued in a civil case. Particularly given the hostility against me and others supportive of abortion in Texas, I fear that people who file suits under S.B. 8 will broadly target myriad forms of assistance, including the counseling that I provide.

15. It is impossible to overstate the impact that this bill will have if it were to go into effect. I know because I serve the people of Texas as a minister, a counselor, and a spiritual advisor. I am deeply concerned about the prospects pregnant people will face. As a person who had two abortions after six weeks myself, I know that the inability to get a legal and safe abortion will decimate pregnant people's livelihoods and future opportunities. S.B. 8 will take a tremendous toll on their financial, psychological, emotional, and spiritual existence.

16. Moreover, this bill is devastating because it will affect both the Texans who seek abortions after they are six weeks pregnant and every person in their support network, who will understandably fear being sued for any assistance they provide.

17. I fear that S.B. 8 will prevent me from fulfilling my calling and purpose as a member of the clergy. If this bill goes into effect, I fear I will not be able to continue my counseling work and will be forced by a court to stop supporting pregnant people making decisions about abortion. S.B. 8 will not change my beliefs, but it could prevent me from expressing them and practicing my own religious and spiritual beliefs.

18. I am driven to my work in counseling pregnant people by an inner, divine calling that there is some purpose bigger than myself. As a person of faith and as a woman who has

benefited from the right to abortion, I feel a divine mandate and destiny to sacrifice as much for those I serve now as the advocates who came before me. It is my turn to serve.

Dated:

7/12/2021

*Reverend Erika Forbes*

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