

**AFFIDAVIT OF RHONDA ARIAS IN SUPPORT OF AMICUS CURIAE
BRIEF OF OIL OF JOY FOR MOURNING IN SUPPORT OF PLAINTIFF-
APPELLANT NORMA MCCORVEY, FORMERLY KNOWN AS JANE ROE**

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

Before me, the undersigned authority, on this day personally appeared Rhonda Arias, who upon oath stated as follows:

1. My name is Rhonda Arias. I am over the age of twenty-one and have never been convicted of a felony or a crime of moral turpitude. I am of sound mind and I am fully competent to make this Affidavit. I have personal knowledge of the matters contained in this Affidavit and the matters contained herein are true and correct.

2. I am a post-abortive woman and a minister in charge of a non-profit faith-based organization known as Oil of Joy for Mourning (hereinafter referred to as “Oil of Joy”). As part of its ministry, Oil of Joy offers a rehabilitation program for post-abortive women who have been harmed by abortion.

3. In connection with this program, Oil of Joy obtained data from women in prison who had completed Oil of Joy’s rehabilitation program. Specifically, Oil of Joy offered a rehabilitation program in 2004 to a general offender population in each of three prisons located in Texas, the Lane Murray Unit located at 1916 North Highway 36 Bypass, Gatesville, Texas (hereinafter “Lane Murray”), the Mt. View Unit located at 2305 Ransom Road, also in Gatesville, Texas (hereinafter “Mt. View”), and the Plane State Jail, located on Route 3 in Dayton, Texas (hereinafter “Plane State”).

4. Oil of Joy conducted intake and exit surveys in conjunction with this program. The results of the study are based on surveys of 104 female offenders in Texas prisons

who voluntarily completed a ten-week support group program for women hurt by abortion.

5. As shown more specifically below, the data obtained from the women who participated in the program demonstrate numerous adverse consequences of abortion, including depression, increased risk of suicide, alcohol and drug abuse, child abuse and neglect, sexual dysfunction, chronic marriage and intimate relationship problems, and an increased likelihood of turning to crime and subsequent incarceration.

6. Fully 74 percent of those surveyed at the beginning of the program said they regretted their abortion. All reported a range of psychological sequelae ranging from regret to suicidal ideation. Despite their present state of incarceration, approximately 59 percent compartmentalize their lives as before and after their abortion. Their abortion was the defining moment in their lives.

7. Approximately 66 percent reported depression following their abortions. The reasons given for such depression included lowered self-esteem post abortion, repressed grief due to having to return to environments where abortion was considered normal, or having been forced or coerced strongly by a spouse or family member to have an abortion. In addition, suicidal ideation and actual suicide attempts were relatively common among these post-abortive women. Approximately 32 percent of the women in our programs reported having attempted suicide following their abortions, with another 37 percent experiencing repeated thoughts of suicide. A true and correct copy of the graph showing these results is as follows:

	Depression	%	Suicide ideation	%	Suicide attempts	
Plane State	31 / 46	67.3	10/35	28.6	10/35	28.6
Mt. View	15-16	93.7	6/16	37.5	5/11	45.5
Lane Murray	23/42	54.8	22/42	52.4	18/42	90.0
	69/104	66.3	38/104	36.5	33/104	31.7

8. Abortion is significantly linked to offenders' subsequent drug and alcohol abuse. Female offenders surveyed by Oil of Joy specifically attributed their drug or alcohol abuse to stress related to their abortion. Most reported that their abortion was either a starting point, or the point at which she increased her usage of drugs and alcohol. Only 14 percent reported that they had no substance abuse post-abortion. The reasons given for such usage or increased usage of drugs or alcohol post-abortion were lowered self-esteem, the pain of a loss that no one seems to understand, the lack of any forum in society within which to grieve, feelings of guilt and shame, and anger toward themselves and others. Forty-five percent of the women surveyed experienced multiple abortions. A true and correct copy of the graph displaying the foregoing findings with respect to the relation between drug and alcohol abuse and abortion is as follows:

	drugs	%	Alcohol	% Alcohol	% Substance abuse
Plane State	39/46	84.7	34/46	73.9	89.1
Mt. View	9/16	56.3	8/16	50.0	62.5
Lane Murray	33/42	78.6	32/42	76.2	85.7
	81/104	77.9	74/104	71.2	83.7

9. The Oil of Joy studies showed that 45.2 percent of the women saw a connection between their abortion and their inability to bond with their subsequent children. Sixty-one percent expressed anxiety in their parenting due to fears that something bad would happen to their present children. They felt they had to overprotect their children and be careful to do everything right. They were motivated by their past decision to wait to become a mother, and felt a need to prove that they had become a perfect mother. If they felt this was not reflected in their child's behavior, the child was

punished severely. A true and correct copy of the graph pertaining to the detachment from born children is as follows:

	Detachment	%
Plane State	22/46	47.8
Mt. View	5/16	31.3
Lane Murray	20/42	47.6
Totals	47/104	45.2

10. Approximately 53 percent of the incarcerated post-abortive women reported experiencing sexual dysfunction, of both short and long duration, beginning immediately after their abortions. These problems included an aversion to sex and/or males in general, and the development of a promiscuous lifestyle. Issues of distrust and fear of pregnancy contributed to frigidity and homosexuality, while lowered self-esteem and a desire to replace the aborted baby contributed to promiscuous lifestyles. A true and correct copy of the graph depicting the responses pertaining to sexual dysfunction and abortion is as follows:

	Frigidity	Promiscuity	Homosexuality	General
Plane State	9/46	14/46	10/46	18/46
Mt. View	6/16	3/16	3/16	8/16
Lane Murray	17/42	20/42	18/42	29/42
Totals	30.7%	35.6 %	29.8%	52.8%

11. In terms of disruption to personal relationships, the following chart shows the results from the prison survey:

	Disruption of personal relationships	%
Plane State	22/46	47.8
Mt. View	13/16	81.3
Lane Murray	31/42	73.8
TOTALS	66/104	63.5

12. Oil of Joy conducted a study in November 2004, consisting of an exit survey of 27 post-abortive women in the Texas Lane Murray Unit. Of these 27 mothers surveyed, approximately 63% of post-abortive female offenders said that they felt that abortion had either a lot to do with their incarceration or an indirect effect on their crime and subsequent incarcerations.

13. Oil of Joy consistently finds that whenever support after abortion to random segments of the prison population is offered, over half of the women respond, expressing their need for recovery after abortion.

14. Given the foregoing plethora of social science data concerning the adverse effects of abortion on the psychological health of women and the mounting evidence associating abortion with criminal behavior, it is clear that the availability of abortion on demand is harmful to womens' health in a myriad of ways, as well as society in general.

Further Affiant saith naught.

Rhonda Arias

SUBSCRIBED AND SWORN TO BEFORE ME by the said Rhonda Arias this ____ day of January, 2005.

Notary Public in and for
The State of Texas

My commission expires:_____