

IN THE SUPREME COURT OF THE STATE OF IDAHO

IDAHOANS UNITED FOR WOMEN
AND FAMILIES,

Petitioner,

vs.

RAÚL R. LABRADOR, in his official
capacity as the Idaho Attorney General;
PHIL MCGRANE, in his official capacity
as the Idaho Secretary of State; LORI
WOLFF, in her official capacity as the
Administrator of the Idaho Division of
Financial Management; and the IDAHO
DIVISION OF FINANCIAL
MANAGEMENT,

Respondents.

Docket No. 52636-2025

DECLARATION OF JULIET CHARRON

RAÚL R. LABRADOR
ATTORNEY GENERAL

Alan M. Hurst, ISB #12425
Solicitor General

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 83720
Boise, ID 83720-0010
(208) 334-2400
alan.hurst@ag.idaho.gov
michael.zarian@ag.idaho.gov
jack.corkery@ag.idaho.gov

Michael A. Zarian, ISB #12418
Deputy Solicitor General

Sean M. Corkery, ISB #12350
Assistant Solicitor General

Attorneys for Respondents

I, Juliet Charron, hereby declare and swear as follows:

1. I am over 18 years of age, have personal knowledge of the matters set forth here, and am competent to make this declaration.
2. I currently work in the Idaho Department of Health and Welfare (DHW) as the Deputy Director for Medicaid & Behavioral Health.
3. In my role with DHW, I am familiar with the administration of the Idaho Medicaid program.
4. The statements in this declaration are based on my professional knowledge and experience.

Idaho Medicaid & Health claims data.

5. When a provider seeks coverage for medical services, it submits a claim to Idaho Medicaid.
6. The claims typically include information regarding services rendered, diagnosis codes, and payment amounts.
7. In my role with DHW, I am familiar with Idaho Medicaid claim records, and in preparing this declaration, I've reviewed a subset of paid claim amounts for Calendar Years 2019 and 2022.

Idaho Medicaid covers abortion complications.

8. As a matter of State policy, Idaho Medicaid provides coverage for treatment and follow-up care at hospitals following abortion complications, including complications from abortifacients like Mifepristone.

9. Often, the cost to Idaho for providing such coverage is not quantified, or is difficult to identify, in the medical records due to a range of factors, such as coding variances and State resources spent administering such coverage.

10. Nonetheless, through a manual review of a subset of Idaho's Medicaid records for the Calendar Years 2022 and 2019, I have identified the below coverage costs to the State of Idaho provided for treatment and follow-up care at hospitals following abortion complications, including complications following abortions from Mifepristone.

11. In Calendar Year 2019, Idaho Medicaid expended at least \$10,086.47 total funds (\$3,025.94 state funds and \$7,060.53 federal funds) covering treatment and follow-up care for abortion medical complications. The abortion medical complications covered by State Medicaid dollars included emergency care after women took RU 486, sometimes also known as Mifepristone or Mifeprex.

12. In Calendar Year 2022, Idaho Medicaid expended at least \$12,658.05 in total funds (\$3,797.42 state funds and \$8,860.64 federal funds) covering treatment and follow-up care for abortion medical complications. The abortion medical complications covered by State Medicaid dollars included emergency care after women took RU 486, sometimes also known as Mifepristone or Mifeprex. Some Idaho Medicaid patients

presenting in emergency rooms with abortion medical complications in CY 2019 and 2022 reported that Planned Parenthood provided them with abortion pills.

Idaho Medicaid covers medical intervention needed following use of mifepristone.

13. Idaho Medicaid provides coverage for medical intervention needed resulting from a medication abortion, which sometimes includes Mifepristone's use.

14. For example, in Calendar Year 2022, Idaho Medicaid provided coverage for a woman presenting to the emergency room with bleeding following a failed medication abortion, reportedly provided by Planned Parenthood. The medical intervention that was required and that Idaho Medicaid covered was dilation & curettage.

Idaho and the Federal Government both spend money on Idaho Medicaid.

15. Idaho Medicaid is a federal/state partnership. Both Idaho and the federal government pay money to cover Idaho Medicaid claims. For instance, from July 2020 to June 2021 Idaho Medicaid expended \$3.24 billion on services for Medicaid participants. Of this amount, approximately \$2.27 billion was federal money.

Number of Idahoans on Idaho Medicaid and number of abortions.

16. From July 2020 to June 2021 Idaho Medicaid average monthly enrollment was 379,954 participants.

17. During that time, Idaho Medicaid average monthly enrollment was 97,055 women between the ages of 14 and 45.

* * * * *

I declare that the foregoing is true and correct to the best of my knowledge,
information and belief.

DATED: March 4, 2025.

By: /s/ Juliet Charron
JULIET CHARRON
Deputy Director for Medicaid & Behavioral
Health at Idaho Department of Health and
Welfare

CERTIFICATE OF SERVICE

I certify that on March 4, 2025, I filed the foregoing electronically through the iCourt E-File system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notification of Service:

Jennifer M. Jensen
jmjensen@hollandhart.com

Anne Henderson Haws
ahhaws@hollandhart.com

Attorneys for Petitioner

/s/ Alan M. Hurst
Alan M. Hurst