

**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**

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**DECLARATION OF MIREN M. UNSWORTH**

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RAÚL R. LABRADOR  
ATTORNEY GENERAL

Alan M. Hurst, ISB #12425  
Solicitor General

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Sean M. Corkery, ISB #12350  
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*Attorneys for Respondents*

I, Miren M. Unsworth, 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 (IDHW) as the Deputy Director of Health and Human Services.
3. Below is a compilation of data from IDHW Bureau of Vital Statistics public reports that were regularly recorded and reported showing the number of surgical and chemical abortions administered to Idaho residents between 2015 and 2023. Only abortions administered to Idaho residents in Idaho are included in the table for 2022 and 2023, but abortions administered to Idaho residents in any State are included for remaining years.

### Total Reported Idaho Abortions and Chemical Abortions by Year<sup>1</sup>

Year	2015 <sup>2</sup>	2016 <sup>3</sup>	2017 <sup>4</sup>	2018 <sup>5</sup>	2019 <sup>6</sup>	2020 <sup>7</sup>	2021 <sup>8</sup>	2022 <sup>9</sup>	2023 <sup>10</sup>
Total Idaho resident abortions	1,686	1,749	1,730	1,742	1,892	2,007	1,985	967	5
Total Idaho resident chemical abortions	699	762	784	771	825	1,102	1,178	--	4

<sup>1</sup> This data is reported in the annual reports in charts labeled “Induced Abortions To Idaho Residents Number by District and County of Residence,” and “Induced Abortions To Idaho Residents Primary Termination Procedure by Clinical Estimated Length of Gestation.”

<sup>2</sup> IDHW, Division of Public Health, Bureau of Vital Records and Health Statistics, Idaho Vital Statistics - Induced Abortion 2015 at 15, 21 (March 2017), <https://tinyurl.com/2jw9crje>.

<sup>3</sup> IDHW, Division of Public Health, Bureau of Vital Records and Health Statistics, Idaho Vital Statistics - Induced Abortion 2016 at 15, 21 (Dec. 2017), <https://tinyurl.com/yc8e6hh2>.

<sup>4</sup> IDHW, Division of Public Health, Bureau of Vital Records and Health Statistics, Idaho Vital Statistics - Induced Abortion 2017 at 15, 21 (Nov. 2018), <https://tinyurl.com/4teve9zn>.

<sup>5</sup> IDHW, Division of Public Health, Bureau of Vital Records and Health Statistics, Idaho Vital Statistics - Induced Abortion 2018 at 15, 21 (Jan. 2020), <https://tinyurl.com/4d2r3k9y>.

<sup>6</sup> IDHW, Division of Public Health, Bureau of Vital Records and Health Statistics, Idaho Vital Statistics - Induced Abortion 2019 at 15, 21 (Jan. 2021), <https://tinyurl.com/msce88a8>.

<sup>7</sup> IDHW, Division of Public Health, Bureau of Vital Records and Health Statistics, Idaho Vital Statistics - Induced Abortion 2020 at 21–22 (Jan. 2022), <https://tinyurl.com/yckdn3zr>.

<sup>8</sup> IDHW, Division of Public Health, Bureau of Vital Records and Health Statistics, Idaho Vital Statistics - Induced Abortion 2021 at 16, 22 (Sept. 2022), <https://tinyurl.com/bdds5vns>.

<sup>9</sup> IDHW, Division of Public Health, Bureau of Vital Records and Health Statistics, Idaho Vital Statistics - Induced Abortion 2022 at 7, 10 (Dec. 2023), <https://tinyurl.com/3mjcb6bm>.

<sup>10</sup> IDHW, Division of Public Health, Bureau of Vital Records and Health Statistics, Idaho Vital Statistics - Induced Abortion in Idaho 2023 at 3–4 (Sept. 2024), <https://tinyurl.com/4x6zttvx>.

\* \* \* \* \*

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

DATED: March 4, 2025.

By: /s/ Miren M. Unsworth  
MIREN M. UNSWORTH  
Deputy Director of Health and Human  
Services 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:

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*Attorneys for Petitioner*

/s/ Alan M. Hurst  
Alan M. Hurst