

3RD CASE of Level 1 printed in FULL format.

JASPER F. WILLIAMS AND EUGENE F. DIAMOND, APPELLANTS v.
DAVID ZBARAS, ET AL. JEFFREY C. MILLER, ACTING DIRECTOR,
ILLINOIS DEPARTMENT OF PUBLIC AID, APPELLANT v. DAVID
ZBARAZ, ET AL. UNITED STATES OF AMERICA, APPELLANT v. DAVID
ZBARAZ, ET AL. PATRICIA R. HARRIS, SECRETARY OF HEALTH,
EDUCATION, AND WELFARE, APPELLANT v. CORA MCRAE, ET AL.
PATRICIA R. HARRIS, SECRETARY OF HEALTH, EDUCATION, AND
WELFARE, APPELLANT v. NEW YORK CITY HEALTH AND HOSPITALS
CORPORATION

Nos. 79-1268 and 79-4, 79-5, 79-491

OCTOBER TERM, 1979

July 25, 1980

BRIEF OF CERTAIN ORGANIZATIONS AS AMICI AND AMICAE CURIAE IN
SUPPORT OF PETITION FOR REHEARING

LAUREN C. ANDERSON, c/o National Conference of Black Lawyers, 126 West 119th
Street, New York, N.Y. 10026, (212) 864-4000

HAYWOOD BURNS, c/o Center for Legal Education and Urban Policy, City College
of New York, New York, N.Y. 10031. (212) 690-5425

ARTHUR KINOY, c/o School of Law-Newark, S.I. Newhouse Center, 15 Washington
Street, Newark, New Jersey 07102, (201) 648-5521

CATHERINE G. RORABACK, P.O. Box 935, Canaan, Connecticut 06108, (203)
824-5121

Attorneys for Amici and Amicae Curiae

Table of Cases and Authorities

Cases

Board of Regents v. Roth, 408 U.S. 564 (1972)

Brown v. Board of Education, 347 U.S. 483 (1954)

Califano v. Jobst, 434 U.S. 47 (1977)

Dred Scott v. Sanford, 60 U.S. (19 How.) 393 (1856)

Elrod v. Burns, 427 U.S. 677 (1973)

Frost & Frost Trucking Co. v. railroad Commission, 271 U.S. 583 (1925)

Fullilove v. Kluttenick, U.S. , 48 U.S.L.W. (1980)

Goldberg v. Kelly, 392 U.S. 254 (1970)

Goldsmith v. United States Board of Tax Appeals, 270 U.S. 117 (1926)

Nos. 79-1268 and 79-4, 79-5, 79-491

Graham v. Richardson, 403 U.S. 365 (1971)

Griggs v. Duke Power Co., 401 U.S. 424 (1971)

Maher v. Roe, 432 U.S. 464 (1977)

Memorial Hospital v. Maricopa County, 415 U.S. 250 (1974)

Perry v. Sinderman, 408 U.S. 593 (1972)

Railway Express Agency v. People of the State of New York, 336 U.S. 106 (1949)

Roe v. Wade, 410 U.S. 113 (1973)

San Antonio School District v. Rodriguez, 411 U.S. 1 (1973)

Shapiro v. Thompson, 394 U.S. 618 (1969)

Sherbert v. Verner, 374 U.S. 398 (1963)

Slochow v. Bd. of Higher Education, 350 U.S. 551 (1956)

Speiser v. Randall, 357 U.S. 513 (1958)

United States v. Jackson, 390 U.S. 570, 581 (1968)

United States Department of Agriculture v. Moreno,

Williamson v. Lee Optical Co , 348 U.S. 483, 491 (1955)

Other Authorities

Stevens & Stevens, "Medicaid: Anatomy of a Dilemma," 35 Law & Contemporary Problems, 348 (1970)

The following organizations respectfully move for leave to file the attached brief as amici curiae in support of the petitions for rehearing in these cases:

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ABORTION RIGHTS COUNCIL OF MINNESOTA

ALLIANCE OF REPRODUCTIVE RIGHTS-CINCINNATI

ALLEGHENY REPRODUCTIVE HEALTH CENTER

AMERICAN ACADEMY OF CHILD PSYCHIATRY

AMERICAN BAPTIST CHURCHES

AMERICAN ETHICAL UNION

AMERICANS FOR DEMOCRATIC ACTION

Nos. 79-1268 and 79-4, 79-5, 79-491

AMERICAN FRIENDS SERCIE COMMITTEE

AMERICAN HUMANIST ASSOCIATION

AMERICAN INDIAN HEALTH CARE ASSOCIATION

AMERICAN JEWISH CONGRESS

AMERICAN PSYCHIATRIC ASSOCIATION

AMERICAN PSYCHOLOGICAL ASSOCIATION

AMERICAN PUBLIC HEALTH ASSOCIATION

ASIAN-AMERICAN LEGAL DEFENSE AND EDUCATION FUND

ASIAN and PACIFIC WOMEN'S CAUCUS OF WASHINGTON STATE

ASIAN WOMEN UNITED

ASSOCIATION OF COMMUNITY ORGANIZATIONS FOR REFORM NOW

THE ASSOCIATION OF LEGAL AID ATTORNEYS OF THE CITY OF NEW YORK, DISTRICT 65,
UAW

ASSOCIATION OF PLANNED PARENTHOOD PHYSICIANS

ASSOCIATION OF RAZA MENTAL HEALTH ADMINISTRATORS, DIRECTORS AND ADVOCATES

ASSOCIATION FOR WOMEN IN PSYCHOLOGY

ATHLETIC ASSOCIATION FOR WOMEN

ATLANTIC COUNTY WOMEN'S CENTER - ABUSE CENTER

BAY AREA WOMEN AGAINST RAPE

BERKELEY WOMEN'S HEALTH COLLECTIVE

BIRTHWAYS

BLACK AMERICAN LAW STUDENTS ASSOCIATION

BLACK PANTHER PARTY

BLACK WOMEN'S AGENDA

B'NAI BRITH WOMEN

BOSTON AREA CHAPTER OF THE NEW AMERICAN MOVEMENT

BOSTON MOBILIZATION FOR SURVIVAL

BOSTON PEOPLE'S ORGANIZATION

Nos. 79-1268 and 79-4, 79-5, 79-491

BOSTON WOMEN'S HEALTH BOOK COLLECTIVE

BUENA VISTA WOMEN'S SERVICES

BUFFALO WOMEN'S LIBERATION UNION

CALIFORNIA RAZA HEALTH ALLIANCE

CALIFORNIA RURAL HEALTH FEDERATION

CALIFORNIA UNION OF HEALTHCARE PROFESSIONALS, SEIU, LOCAL 723, AFL-CIO

CALIFORNIA URBAN INDIAN HEALTH CENTERS, INC.

CALIFORNIA WOMEN LAWYERS

CALIFORNIA WOMEN'S HEALTH NETWORK

CATHOLICS FOR A FREE CHOICE

CEDAR RAPIDS CLINIC FOR WOMEN

CENTER FOR ELIMINATION OF VIOLENCE IN THE FAMILY

CENTER FOR MEDICAL CONSUMERS

CENTER FOR WOMEN POLICY STUDIES

CENTRO PARA IMMIGRANTAS

CHARLES HOUSTON BAR ASSOCIATION

CHELSEA WOMEN'S HEALTH TEAM

CHICANA FORUM

CHICANA SERVICE ACTION CENTER

CHICO FEMINIST WOMEN'S HEALTH CENTER

CHILDREN BY CHOICE COALITION OF SAN MATEO COUNTY

CHRISTIAN CHURCH (DISCIPLES OF CHRIST) DEPARTMENT OF CHURCH WOMEN OF THE
DIVISION OF HOMELAND MINISTRIES

CITIZENS COMMITTEE FOR CHILDREN OF NEW YORK, INC.

CLEVELAND PRO-CHOICE ACTION COMMITTEE

CLEVELAND RAPE CRISIS CENTER

COALITION OF LABOR UNION WOMEN

COALITION FOR ABORTION RIGHTS EQUALITY

COALITION FOR ABUSED WOMEN, INC.

COALITION FOR A PEOPLE'S ALTERNATIVE IN 1980

COALITION FOR CHOICE

COALITION FOR THE MEDICAL RIGHTS OF WOMEN/COMMITTEE TO DEFEND REPRODUCTIVE RIGHTS

COLUMBIA COUNTY WOMEN'S RESOURCE CENTER

COMISION FEMENIL MEXICANA NACIONAL

COMMITTEE FOR ABORTION RIGHTS AND AGAINST STERILIZATION ABUSE

COMMITTEE OF INTERNS AND RESIDENTS

COMMITTEE TO END STERILIZATION ABUSE

COMMUNITY HEALTH ADVOCATES

COMMUNITY LAW PROJECT

COMMUNITY SERVICE SOCIETY

CONNECTICUT WOMEN'S EDUCATION AND LEGAL DEFENSE FUND, INC.

COORDINATING CENTER FOR WOMEN IN CHURCH AND SOCIETY, THE UNITED CHURCH OF CHRIST

COUNTY WELFARE DIRECTORS ASSOCIATION

DETROIT ALLIANCE FOR A RATIONAL ECONOMY

DISTRICT 65- UAW

DISTRICT 1199, NATIONAL UNION OF HOSPITAL AND HEALTH CARE EMPLOYEES, AFL-CIO

DOMESTIC VIOLENCE PROJECT

EDUCATION FOR FREEDOM OF CHOICE IN OHIO

EMERGE: A MEN'S COUNSELING SERVICE ON DOMESTIC VIOLENCE

EMORY UNIVERSITY CENTER FOR WOMEN'S INTEREST LAW

EQUAL RIGHTS ADVOCATES, INC.

FAMILY ADULT SHELTER

FAMILY PLANNING COUNCIL OF WESTERN MASSACHUSETTS, INC.

FANNY LOU HAMER HEALTH CLINIC

FEDERALLY EMPLOYED WOMEN, INC.

FEDERATION OF ORGANIZATIONS FOR PROFESSIONAL WOMEN

FEDERATION OF PROTESTANT WELFARE AGENCIES

FEMINIST HEALTH WORKS

FEMINIST PARTY

FEMINIST WOMEN'S HEALTH CENTER (ATLANTA)

FINANCIAL WOMEN'S ASSOCIATION OF NEW YORK

FOUNDERS CLINIC, INC.

FREEDOM OF CHOICE - MIAMI VALLEY

FREEDOM OF CHOICE - OHIO

GAY AND LESBIAN ADVOCATES AND DEFENDERS

GAY POLITICAL CAUCUS

GRAND JURY PROJECT

HARRIS COUNTY DEMOCRATS

HARRIS COUNTY WOMEN'S POLITICAL CAUCUS

HEALTH COALITION FOR AFFIRMATIVE ACTION

HEALTHRIGHT, INC.

HUMAN SERVICES ALLIANCE

INDIAN RIGHTS ASSOCIATION

INSTITUTE OF THE BLACK WORLD

INTERNATIONAL SOCIALIST ORGANIZATION

INTERNATIONAL UNION OF ELECTRICAL, RADIO AND MACHINE WORKERS, AFL-CIO-CLC

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE AND AGRICULTURAL IMPLEMENT WORKERS OF AMERICA

JUVENILE RIGHTS PROJECT

LAS AMIGAS, INC.

LAS MUJERES FOR POLITICAL ACTION

LATINAS IN HEALTH AND HUMAN SERVICES

Nos. 79-1268 and 79-4, 79-5, 79-491

LAW STUDENTS CIVIL RIGHTS RESEARCH COUNCIL
LEAGUE OF WOMEN VOTERS OF THE U.S.A.
LESBIAN/GAY CAUSE OF BUTTE COUNTY
LOS ANGELES FEMINIST WOMEN'S HEALTH CENTER
LOS ANGELES CHILDBIRTH CENTER
LOUISIANA CENTER FOR THE PUBLIC INTEREST
MAINE RIGHT TO CHOOSE
MASSACHUSETTS COALITION OF BATTERED WOMEN'S SERVICE GROUPS
MASSACHUSETTS LAW REFORM INSTITUTE
MEMPHIS CENTER FOR REPRODUCTIVE HEALTH
METHODIST FEDERATION FOR SOCIAL ACTION
MEXICAN-AMERICAN LEGAL DEFENSE AND EDUCATIONAL FUND
MEXICAN-AMERICAN WOMEN'S NATIONAL ASSOCIATION
MICHIGAN CITIZENS LOBBY
MICHIGAN LEGAL SERVICES
MICHIGAN WELFARE RIGHTS ORGANIZATION
MIDWEST HEALTH CENTER FOR WOMEN
MIDWEST WOMEN'S CENTER
MIN AN HEALTH CENTER
MS. FOUNDATION FOR WOMEN, INC.
MUJERES LATINAS EN ACCION
MULTNOMAH BAR ASSOCIATION/LEGAL AID SERVICE
NATIONAL ABORTION FEDERATION
NATIONAL ABORTION RIGHTS ACTION LEAGUE
NATIONAL ALLIANCE FOR OPTIONAL PARENTHOOD
NATIONAL ALLIANCE AGAINST RACIST AND POLITICAL REPRESSION
NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE

NATIONAL ASSOCIATION OF COMMISSIONS FOR WOMEN
NATIONAL ASSOCIATION OF GARMWORKER ORGANIZATIONS
NATIONAL ASSOCIATION OF SOCIAL WORKERS
NATIONAL BAR ASSOCIATION
NATIONAL CAPITAL TAY-SACHS FOUNDATION
NATIONAL CENTER ON WOMEN AND FAMILY LAW
NATIONAL COMMITTEE ON HOUSEHOLD EMPLOYMENT
NATIONAL CONFERENCE OF BLACK LAWYERS
NATIONAL CONFERENCE OF PUERTO RICAN WOMEN
NATIONAL COUNCIL OF CHURCHES OF CHRIST IN THE U.S.A.
NATIONAL COUNCIL OF JEWISH WOMEN
NATIONAL EMPLOYMENT LAW PROJECT STAFF ASSOCIATION
NATIONAL FAMILY PLANNING AND REPRODUCTIVE HEALTH ASSOCIATION
NATIONAL FEDERATION OF TEMPLE SISTERHOODS
NATIONAL GAY TASK FORCE
NATIONAL LAWYERS GUILD
NATIONAL LEGAL AID AND DEFENDER ASSOCIATION
NATIONAL PUERTO RICAN FORUM
NATIONAL ORGANIZATION FOR WOMEN
NATIONAL ORGANIZATION FOR WOMEN LEGAL DEFENSE AND EDUCATION FUND
NATIONAL ORGANIZATION OF LEGAL SERVICES WORKERS
NATIONAL URBAN LEAGUE, INC.
NATIONAL WOMEN'S CONFERENCE OF THE AMERICAN ETHICAL UNION
NATIONAL WOMEN'S HEALTH NETWORK
NATIONAL WOMEN'S POLITICAL CAUCUS
NATIONAL WOMEN'S STUDIES ASSOCIATION
NEW JERSEY ASSOCIATION OF BLACK EDUCATORS

Nos. 79-1268 and 79-4, 79-5, 79-491

NEW YORK COALITION CONCERNED WITH ADOLESCENTS AND THEIR FAMILIES

NEW YORK MOBILIZATION FOR SURVIVAL

NEW YORK WOMEN FOR CRIMINAL JUSTICE, INC.

NORMANS EQUITY ACTION LEAGUE, HOUSTON CHAPTER

NORTHWEST WOMEN'S HISTORY PROJECT

NOVA HEALTH SYSTEM, DBA REPRODUCTIVE SERVICES

OMNI HEALTH CENTER

OPTIONS FOR WOMEN OVER FORTY

OREGON FEDERATION OF NURSES, LOCAL 5017

OREGON LEGAL SERVICES

OREGON WOMEN'S LAW CAUCUS

ORGANIZATION OF WOMEN FOR LEGAL AWARENESS

PARK SLOPE SAFE HOMES PROJECT

PEOPLE'S ALLIANCE

PHYSICIAN'S FORUM

PITTSBURGH FREE CLINIC, INC.

PLANNED PARENTHOOD FEDERATION OF AMERICA, INC.

PORTLAND MENTAL HEALTH PROJECT

PORTLAND STATE UNIVERSITY WOMEN'S STUDIES CERTIFICATE PROGRAM

PORTLAND WOMEN'S HEALTH CENTER

PORTLAND WOMEN'S RESOURCE CENTER

PREGNANCY CONSULTATION CENTER

PRETERM CLEVELAND

PRO-CHOICE COALITION

PROJECT RETURN FOUNDATION, INC.

PUERTO RICAN LEGAL DEFENSE AND EDUCATION FUND

RAPE AND ASSAULT COMMITTEE FOR THE NASHUA AREA, INCL

RELIGIOUS COALITION FOR ABORTION RIGHTS
RELIGIOUS LEADERS FOR A FREE CHOICE
REPRODUCTIVE RIGHTS NATIONAL NETWORK
REPRODUCTIVE SERVICES
SAN FRANCISCO LAWYERS' COMMITTEE FOR URBAN AFFAIRS
SAN FRANCISCO WOMEN'S CENTER/WOMEN'S BUILDING
SAN FRANCISCO WOMEN'S HEALTH CENTER
SCHENECTADY COMMUNITY ACTION PROGRAM, INC.
SOCIAL SERVICES EMPLOYEES UNION, LOCAL 371, DC 37, AFSCME
SOJOURNER TRUTH CENTER FOR WOMEN
SOMERVILLE WOMEN'S CENTERS
SOUTHERN POVERTY LAW CENTER
SUMMIT MEDICAL CENTER
SUPPORT CENTER
TALLAHASSEE FEMINIST WOMEN'S CENTER
ULSTER COUNTY COALITION FOR FREE CHOICE
UNION OF AMERICAN HEBREW CONGREGATIONS
UNION W.A.G.E.
UNITED CHURCH BOARD FOR HOMELAND MINISTRIES
UNITARIAN UNIVERSALIST ASSOCIATION
UNITARIAN UNIVERSALIST SERVICE COMMITTEE
UNITARIAN UNIVERSALIST WOMEN'S FEDERATION
UNITED ELECTRICAL, RADIO & MACHINE WORKERS OF AMERICA
UNITED NEIGHBORHOOD HOUSES
UNITED PRESBYTERIAN CHURCH IN THE U.S.A.
UNITED SYNAGOGUE OF AMERICA
UNITED WELFARE LEAGUE

WASHINGTON SQUARE LEGAL SERVICES, INC.
WAYNE COUNTY NEIGHBORHOOD LEGAL SERVICES
WELFARE ACTION COALITION
WELFARE RECIPIENTS LEAGUE, INC.
WESTCHESTER COALITION FOR LEGAL ABORTION
WESTCHESTER PEOPLE'S ACTION COALITION, INC.
WESTERN NEW YORK COALITION FOR FREEDOM OF CHOICE
WESTSIDE MOTHERS
WESTSIDE WOMEN'S CLINIC
WAR RESISTER'S LEAGUE
WOMEN AGAINST ABUSE
WOMEN AGAINST PORNOGRAPHY
WOMEN AGAINST VIOLENCE AND PORNOGRAPHY IN MEDIA
WOMEN AND CHILDREN'S RIGHTS COALITION CITIZENS GROUP
WOMEN'S CRISIS SERVICE
WOMEN FOR WOMEN OF CINCINNATI, INC.
WOMEN'S HEALTH CONCERNS COMMITTEE
WOMEN-IN-CRISIS/COUNSELING AND ASSISTANCE
WOMEN IN HEALTH ROUNDTABLE
WOMEN IN POLITICS
WOMEN IN SELF-HELP
WOMEN LAWYERS ASSOCIATION OF LOS ANGELES
WOMEN LAWYERS ASSOCIATION OF MICHIGAN
WOMEN ORGANIZED AGAINST RAPE
WOMEN ORGANIZING FOR REPRODUCTIVE CHOICE
WOMEN U.S.A.
WOMEN'S ACTION ALLIANCE

WOMEN'S ADVOCATES

WOMEN'S BAR ASSOCIATION OF MASSACHUSETTS

WOMEN'S CAUCUS FOR ART, HOUSTON CHAPTER

WOMEN'S CENTER

WOMEN'S CENTER OF MID-MINNESOTA

WOMEN'S COALITION

WOMEN'S COMMISSION IN EXILE

WOMEN'S EQUITY ACTION LEAGUE EDUCATIONAL AND LEGAL DEFENSE FUND

WOMEN'S HEALTH SERVICES, INC. (CONNECTICUT)

WOMEN'S HEALTH SERVICES, INC. (PITTSBURGH)

WOMEN'S HEALTH SERVICES (SANTA FE)

WOMEN'S INTERNATIONAL LEAGUE FOR PEACE AND FREEDOM

WOMEN'S LAW CENTER

WOMEN'S LAW FUND

WOMEN'S LAW PROJECT

WOMEN'S LEAGUE FOR CONSERVATIVE JUDAISM

WOMEN'S RESOURCE AND SURVIVAL CENTER

WOMEN'S RESOURCE CENTER (CALIFORNIA)

WOMEN'S RESOURCE CENTER (ST. LOUIS)

WOMEN'S RIGHTS ACTION GROUP

WOMENSPACE

WOMEN'S STUDIES COLLEGE, STATE UNIVERSITY OF NEW YORK, BUFFALO

WOMEN'S WORK PROJECT

WORKERS WORLD PARTY/YOUTH AGAINST WAR AND FASCISM

WORKING WOMEN'S INSTITUTE

YOUNG WOMEN'S INSTITUTE

YOUNG WOMEN'S CHRISTIAN ASSOCIATION OF GREATER PITTSBURGH

Nos. 79-1268 and 79-4, 79-5, 79-491

YWCA OF THE U.S.A. - NATIONAL BOARD

YWCA OF NEW YORK CITY

YWCA OF SYRACUSE, ONANDAGA COUNTY (N.Y.)

YWCA OF PONTIAC-NORTH OAKLAND (MICHIGAN)

YWCA BATTERED WOMEN'S PROGRAM

YWCA WOMEN'S CRISIS SERVICE OF MANCHESTER

YWCA WOMEN'S TRADE CENTER

YOUTH PRIDE, INC.

ZERO POPULATION GROWTH

The consent of the attorneys for all the parties in these cases has been obtained and letters to this effect have been forwarded to the Clerk of the Court. Amici have been advised to proceed by way of motion however, in light of the fact that Rule 36 effective June 30, 1980, does not provide a procedure for the filing of amicus briefs in regard to petitions for rehearing.

Amici are 286 civil rights, labor, church, health, professional and community service organizations whose work, constituencies and interests are gravely affected by the decisions in this case. Amici ask leave to file this brief because of the extraordinary importance of this case in terms of its consequences for the lives of women and children and its implications for the principles of equal justice. Amici believe that their brief will contain a more complete analysis of the errors in the majority's opinions than contained in the petitions of the parties.

Amici urge that special circumstances exist for granting this motion: the fact that expedition of the appeal appears to have deprived the Court of time necessary thoroughly to consider the complex record and issues before it, that the cases were decided by a bare majority, and that the ruling appears to be an unprecedented departure from the principles of equal justice previously applied by the Court.

Dated: New York, N.Y., July 25, 1980

Respectfully submitted,

LAUREN C. ANDERSON, c/o National Conference of Black Lawyers, 126 West 119th Street, New York, N.Y. 10026, (212) 864-4000

HAYWOOD BURNS, c/o Center for Legal Education and Urban Policy, City College of New York, New York, N.Y. 10031, (212) 690-5425

ARTHUR KINOY, c/o School of Law-Newark, S.I. Newhouse Center, 15 Washington Street, Newark, New Jersey 07102, (201) 648-5521

CATHERINE G. RORABACK, P.O. Box 935, Canaan, Connecticut 06108, (203) 824-5121

Nos. 79-1268 and 79-4, 79-5, 79-491

Attorneys for Amici and Amicae Curiae

INTEREST OF THE AMICI

The 286 local and national organizations n1 which join this brief represent a broad spectrum of American society. They include organizations serving the health needs of women, welfare recipients, minority, and women's groups organized to seek equal justice; associations of professional women and men; labor organizations; community groups; church and lay organizations; advocates for the health and legal rights of the poor; and groups organized to defend abortion and reproductive rights.

n1 Organizational statements of interest are contained in the Appendix to this Brief.

Despite widely differing beliefs on the subject of abortion, amici share the conviction that the personal liberty recognized in Roe v. Wade and protected against state interference must be protected for all women -- rich and poor alike. They join in this brief to express their deep concern that, if left to stand, the majority decisions in McRae and Zbaraz will not only have devastating consequences for the lives of hundreds of thousands of poor women, children and families, but also sanction the erosion of the principles of equal justice.

INTRODUCTION: INTRODUCTORY STATEMENT AND SUMMARY OF ARGUMENT

The promise of the Civil Rights Amendments is the promise of equal justice and one Constitution for all. The majority opinions, however, create a double standard of health care and separate Constitutions -- one for the rich and one for the poor. Just as Dred Scott v. Sanford/refused citizenship to Black people, these opinions strip the poor of meaningful citizenship under the fundamental law. Not only do they fail to recognize the coercive impact that selective provision of benefits has on the exercise of constitutional rights. They also fail to apply to the deprivation of welfare entitlements the same standard of minimal constitutional acceptability -- rational relationship to a legitimate state interest -- by which the guarantee of impartial justice is tested in every other sphere and in regard to matters of far less constitutional consequence. Along with Mr. Justice Marshall, amici "do not believe that a constitution committed to the equal protection of the laws can tolerate this result." Harris v. McRae, slip op. at 12 (concurrence).

Amici ask the Court to reconsider the thorough and indisputable factual findings of the District Court which demonstrate that an unwanted and complicated pregnancy is for many poor women the most severe physical and mental health crisis of their younger years. Amici ask the Court to reconsider a ruling which deems it reasonable for the state to "encourage" the continuation of dangerous pregnancies by the poor alone and pay a doctor to preside over a woman's death or disablement, but not to perform the one service that could have averted these tragedies. Amici ask the Court to reconsider a ruling which opens the door to wholesale use of government programs not to benefit the poor, but rather deliberately to destroy their basic civil rights and jeopardize their survival and welfare.

TEXT: ARGUMENT

Both the majority opinions and the concurring opinion of Mr. Justice White failed to grapple with the principle that the existence of the Medicaid program creates an entitlement to non-discriminatory treatment. While amici believe that the Court erred in *Maier v. Roe*, 432 U.S. 464 (1977) for the reasons stated in dissenting opinions of Mr. Justices Brennan, Blackmun and Marshall, the failure of the instant decisions to address the differences between this case and *Maier* from an equal protection perspective represent an unprecedented departure from the basic tenets of constitutional protection for the poor.

I. THE MAJORITY'S DECISIONS ARE INCONSISTENT WITH THE CONSTITUTION'S RECOGNITION THAT PUBLIC ASSISTANCE PROGRAMS CREATE AN ENTITLEMENT TO IMPARTIAL TREATMENT.

The Court has long held that public benefits -- whether they be in the form of a license to practice one's profession, the right to do business, the right to retain public employment, eligibility for tax exemption, unemployment compensation, or other public assistance -- are constitutionally protected entitlements, whose granting and taking away is subject to constitutional limitations. n2

n2 See, e.g., *Godsmith v. United States Board of Tax Appeals*, 270 U.S. 117 (1926); *Frost & Frost Trucking Company v. Railroad Commission*, 271 U.S. 583 (1925); *Slochow v. Bd. of Higher Education*, 350 U.S. 551 (1956); *Perry v. Sinderman*, 408 U.S. 593 (1972); *Bd. of Regents v. Roth*, 408 U.S. 564 (1972); *Speiser v. Randall*, 357 U.S. 513; *Sherbert v. Verner*, 374 U.S. 398 (1963); *Shapiro v. Thompson*, 394 U.S. 618 (1969); *Goldberg v. Kelly*, 392 U.S. 254 (1970); *Memorial Hospital v. Maricopa County*, 415 U.S. 250 (1974).

his is nowhere more clearly stated than in *Goldberg v. Kelly*, 397 U.S. 254 (1970), where by the majority of the eight, the Court recognized that property rights -- so diligently protected by the framers of the Constitution -- must, in our modern age, encompass government largesse in the form of welfare benefits for the poor. n3

n3 It may be realistic today to regard welfare entitlements as more like "property" than a "gratuity." Much of the existence of the wealth in this country takes the form of rights that do not fall within traditional common-law concepts of property. It has been aptly noted that

(s)ociety today is built around entitlement. The automobile dealer has his franchise, the doctor and the lawyer their professional licenses, the worker his union membership, contract and pension rights, the executive his contract and stock options; all are devices to aid security and independence. Many of the most important of these entitlements now flow from government; subsidies to farmers and businessmen, routes to airlines and channels for television stations; long term contracts for defense, space, and education; social security pensions for individuals. Such services of security, whether private or public, are no longer regarded as luxuries of gratuities, to the recipients they are essential, fully deserved and in no sense a form of charity. It is only the poor whose entitlements, although recognized by public policy, have not been effectively enforced. Reich, "Individual Rights and Social Welfare: The Emerging Legal Issues," 74 Yale L.J. 1245, 1255 (1965). *Goldberg v. Kelly*, 397 U.S. 254 at 262, n.8.

Nos. 79-1268 and 79-4, 79-5, 79-491

The consistent teaching of this Court, summarized recently in *Elrod v. Bruns*, 427 U.S. 347 (1976), refuses to characterize public benefits as a mere "privilege" rather than a "right" for the purpose of constitutional protections:

'For at least a quarter-century, this Court has made clear that even though a person has no 'right' to a valuable governmental benefit and even though the government may deny him the benefit for any number of reasons, there are some reasons upon which the government may not rely.' 408 U.S. at 597, 92 S. Ct. at 2697. Perry and Keyishian properly recognize one such impermissible reason: The denial of a public benefit may not be used by the government for the purpose of creating an incentive enabling it to achieve what it may not command directly.

"'[T]he theory that public employment which may be denied altogether may be subjected to any conditions, regardless of how unreasonable, has been uniformly rejected.'" *Keyishian v. Board of Regents*, 385 U.S. at 605-606, 87 S. Ct. at 685. . . . "[T]his Court now has rejected the concept that constitutional rights turn upon whether a governmental benefit is characterized as a "right" or as a "privilege.'" *Sugarman v. Dougall*, 413 U.S. 634, 644, 93 S. Ct. 2842, 2848, 37 L. Ed. 2d 853 (1978) (quoting *Graham v. Richardson*, 403 U.S. 365, 374, 91 S. Ct. 1848, 1853, 29 L. Ed. 2d 534 (1971)).

Id. at 360-362. See also *Elrod v. Burns*, 427 U.S. at 374 (Stewart, J., concurring); *Board of Regents v. Roth*, 408 U.S. 564, 571, n. 9 (1972).

By treating Medicaid-eligible pregnant women as no worse off than they would be if there were no Medicaid program, the majority opinions here ignore the principle of statutory entitlement. *Harris v. McRae*, slip op. 15, 17. The rationale that a woman "continues as before to be dependent on private sources" id. at 474 -- articulated in *Maher*, 432 U.S. at 474, in the context of a program which the Court defined as not including elective services -- does not apply in a context where the desired service is medically necessary and, by definition, part of the statutory entitlement. The premise that the poor are no worse off in the private sector than if no program existed is not only untrue as a matter of fact. n4 As a matter of law this premise would completely nullify the constitutional safeguards against discriminatory, arbitrary or illegitimate excisions in all public welfare programs or other benefits schemes.

n4 As a result of the Medicaid program and its predecessors, both hospitals and physicians reduced their own private contributions to medical care for the indigent. See Stevens and Stevens, "Medicaid: Anatomy of a Dilemma," 35 *Law & Contemporary Problems* 348 (1970).

Amici urge reconsideration of this extension of *Maher* to justify denial of an existing statutory entitlement here.

II. THE MAJORITY DECISIONS APPROVE A DOUBLE STANDARD OF MINIMAL CONSTITUTIONAL ACCEPTABILITY.

These decisions sanction as constitutionally reasonable and legitimate an unspeakably cruel sacrifice of the lives and health of poor women. They do this by ignoring the consequences of health-threatening pregnancies and by accepting, for the first time, that there can be two standards of minimal constitutional permissibility.

Nos. 79-1268 and 79-4, 79-5, 79-491

Roe v. Wade recognized several constitutional principles which a fortiori apply here notwithstanding the difference recognized in Maher between the regulatory and funding context. First, Roe v. Wade rejected the contentions that a fetus is a person under the written Constitution, 410 U.S. at 156-159, and that the state may accord it the value of an actual human being Id. at 159-162. Second, Roe v. Wade held that it is impermissible for the state to seek to protect fetal life at the expense of maternal life or health. Id. at 164. The essence of this ruling is that while the protection of potential life is legitimate -- and after viability, compelling -- it remains illegitimate to pursue this interest at the expense of maternal health or life. Id. at 155.

Thus, with respect to laws which sacrifice a woman's life health for the sake of fetal life, Roe v. Wade articulates what is minimally acceptable under the Constitution. Id. at 163-164. Legitimacy or minimal acceptability is a constant; it does not vary with the kind of legislation involved. n5

n5 For this reason, the interest balancing in Roe v. Wade is controlling in this case, where maternal health and life is at stake, in contrast to Maher, where the legitimacy of the interest in potential life was not undermined by a similar health impact. Compare Harris v. McRae, Slip op. at 3 (White, J., concurring).

Thus, under these decisions, the poor are denied the protection of the most elemental concepts of constitutional acceptability. The majority opinions suggest that regulation of commercial interests may draw greater constitutional protection than does regulation of the statutory entitlement of the poor to the health care necessary to their self-preservation. n6 These decisions, if allowed to stand, threaten to destroy the promise of a single Constitution for all.

n6 In Roe v. Wade, Mr. Justice Rehnquist, dissenting, considered that a prohibition on abortion, when a woman's life is in jeopardy, would be invalid under Williamson v. Lee Optical Co., 348 U.S. 483, 491 (1955). The majority ignores, however, the undisputed facts that the Hyde Amendment's exclusion of medically-necessary abortions jeopardizes women's lives and, thus, appears to sanction complete elimination of the entitlement to Medicaid for abortion. Thus even the minimal Lee Optical standard is not being applied to protect the poor.

III. THE MAJORITY OPINIONS IGNORE THE CONSTITUTIONAL PRINCIPLE THAT DENIAL OF A STATUTORY ENTITLEMENT IS COERCIVE IN FACT.

This Court has traditionally taken judicial notice of the practical necessity of welfare benefits to the survival and basic needs of the poor, recognizing that this heightens rather than diminishes the need to protect such entitlements. Memorial Hospital v. Maricopa County, 415 U.S. at 259; Goldberg v. Kelly, 397 U.S. at 264. The Court has also routinely noticed the deterrent or coercive effect in fact of deprivations of such benefits on the exercise of fundamental rights. Sherbert v. Verner, 374 U.S. at 404; Shapiro v. Thompson, 394 U.S. at 629; Memorial Hospital v. Maricopa County, 415 U.S. at 257-258 By contrast here, the majority ignores the demonstrated fact that the denial of medically-necessary abortion coerces poor women to forego safe, legal abortion to protect their health.

The distinction drawn by the majority between regulation which is defined as coercive, and funding which is not, improperly extends the due process analysis of Maher and resurrects a premise -- repugnant to the entitlement principle --

Nos. 79-1268 and 79-4, 79-5, 79-491

that poverty is the fault of the poor. *Harris v. McRae*, slip op. at 17. This distinction flies in the face of the Court's recognition in *Goldberg v. Kelly* that government shares responsibility for the creation of poverty and benefits from its alleviation:

From its founding the Nation's basic commitment has been to foster the dignity and well-being of all persons within its borders. We have come to recognize that forces not within the control of the poor contribute to their poverty. This perception, against the background of our traditions, has significantly influenced the development of the contemporary public assistance system. Welfare, by meeting the basic demands of subsistence, can help bring within the reach of the poor the same opportunities that are available to others to participate meaningfully in the life of the community. At the same time, welfare guards against the societal malaise that may flow from a widespread sense of unjustified frustration and insecurity. Public assistance, then, is not mere charity, but a means to 'promote the general Welfare, and secure the Blessings of Liberty to ourselves and our Posterity.'

Id. at 264-265. (footnote omitted).

In this case the contribution of government to the existence of an impoverished population is particularly obvious. For example, increasing numbers of people are dependent on Medicaid today because government has opted to increase unemployment in response to economic crisis. Women and minorities are disproportionately indigent because of past and present governmental policies which have promoted and permitted discrimination on the basis of race and sex. n7 Indeed, it is hardly coincidental that the brutal toll of the Hyde Amendment falls upon a class which is disproportionately female and disproportionately members of minority groups. n8 And conversely, it is painfully clear that the Hyde Amendment will operate each year to condemn thousands of poor women and their children to an inescapable cycle of poverty, disease and dependency.

n7 See, e.g., *Brown v. Bd. of Education*, 347 U.S. 483 (1954); *Griggs v. Duke Power Co.*, 401 U.S. 424 (1971); *Fullilove v. Klutnick*, U.S. , 48 U.S.L.W. 4979 (June 24, 1980); and *Frontiero v. Richardson*, 411 U.S. 677 (1973).

n8 As Mr. Justice Marshall noted in *Maher v. Roe*, 432 U.S. at 459, n. 3, "Blacks and other non-white groups are heavily overrepresented among both abortion patients and Medicaid recipients. In 1975, about 13.1% of the population was nonwhite . . . yet 31% of women obtaining abortions were of minority race." (citations omitted). Moreover, 39% of Black women rely on Medicaid for their health care needs compared to 7% of white women. Plaintiffs-Appellees' Brief at 44. n.66. The abortion to live birth ratio is nearly two times higher among Blacks than whites and the maternal mortality rate will be even more disproportionate as a result of the Hyde Amendment. *Ibid.* In 1972, maternal mortality for minorities was 490% higher than for the corresponding white population. The disparity declined until 1975 when it was 76%. In 1976, maternal mortality for minorities rose again to 327% higher than for whites. *Ibid.* Women are also disproportionately recipients of Medicaid. In 1977, for every man there were 1.8 women. *Maher v. Roe*, 432 U.S. at 460, n. 4 (Marshall, J., concurring).

It is, thus, completely unjustifiable to permit the state to disclaim responsibility for the concrete impact of discriminatory denials of essential

Nos. 79-1268 and 79-4, 79-5, 79-491

benefits on the ability of the poor to exercise their constitutional rights or even to survive. Moreover, it is extremely dangerous to do so. The method of coercion -- whether it be through selective funding or criminal proscription -- is irrelevant if the principle that the state cannot seek to do indirectly that which it cannot do directly is to survive. *Elrod v. Burns*, 427 U.S. at 359, n. 13; *Speiser v. Randall*, 357 U.S. at 526.

IV. THE MAJORITY OPINIONS IGNORE THE CONSTITUTIONAL PRINCIPLE THAT GOVERNMENT MAY NOT WITHHOLD STATUTORY ENTITLEMENTS TO THWART THE EXERCISE OF CONSTITUTIONAL RIGHTS.

If the majority followed the settled teaching that a law which has "no other purpose . . . than to chill the assertion of constitutional rights by penalizing those who choose to exercise them . . . [is] patently unconstitutional," *United States v. Jackson*, 390 U.S. 570, 581 (1968), it could not have sustained the Hyde Amendment. See *Shapiro v. Thompson*, 394 U.S. at 631; *United States Department of Agriculture v. Moreno*, 413 U.S. 528 (1973); cf. *Califano v. Jobst*, 434 U.S. 47 (1977).

The Court should rehear this case in order to examine the legislative history and the findings of the District Court with respect to the purpose of the Hyde Amendment. These make crystal clear that the proponents of restriction sought to use the coercive effect of denying abortion funding to prevent poor women from exercising their right to choose abortion and preserve their health.

The majority's failure to examine the legislative purpose here leaves the poor vulnerable to deliberate efforts to destroy their constitutional rights whenever funding programs are involved. This failure is particularly serious in the context of reproductive rights.

If today the state can thwart exercise of the right to abortion, what protection is there against a reverse Hyde Amendment which would provide Medicaid coverage of abortion and sterilization only? Without the intervention of this Court, rights as precious and fundamental as those involving childbearing are a nullity for the poor.

Finally, for the majority to ignore the clear purpose and devastating consequences of the denial of coverage for medically-necessary abortions gives the state virtually untrammelled power to use selective funding to manipulate and destroy the lives of the poor. If in order to protect fetal life, poor women can be refused a necessary medical alternative and thereby be made to suffer dangerous pregnancies or turn to dangerous illegal abortions, why cannot the state limit other health care options to coerce the poor into becoming guinea pigs for dangerous medical or social experimentation purportedly to benefit other full human beings? The power to withhold a necessary welfare benefit in order to "encourage" an activity which is, by definition, dangerous to the recipient is a frightening and illegitimate one. To sanction this power with respect to the poor alone is completely at odds with the fundamental law of the land.

CONCLUSION

By a bare majority and under conditions of great haste, this Court has sanctioned the legislative imposition of enormous suffering upon poor women and departed from time-honored constitutional principles without discussing either

Nos. 79-1268 and 79-4, 79-5, 79-491

the practical consequences or legal implications of its ruling.

Under our constitutional scheme, the Court owes a special duty to the class of indigent pregnant and disproportionately minority women who are the sole victims of the effort to reverse Roe v. Wade. They are "saddled with such disabilities[,] . . . subjected to such a history of purposeful unequal treatment, . . . [and] relegated to such a position of political powerlessness as to command extraordinary protection from the majoritarian political process." San Antonio School District v. Rodriguez, 411 U.S. 1 at 28 (1973).

Heightened scrutiny, though constitutionally appropriate here, is not required. The principle of equal justice is sufficient to invalidate the Hyde Amendment. As Mr. Justice Jackson wrote in Railway Express Agency v. People of the State of New York, 336 U.S. 106 at 112-113 (1949) (concurring):

The framers of the Constitution knew, and we should not forget today, that there is no more effective practical guaranty against arbitrary and unreasonable government than to require that the principles of law which officials would impose upon a minority must be imposed generally. Conversely, nothing opens the door to arbitrary action so effectively as to allow those officials to pick and choose only a few to whom they will apply legislation and thus to escape the political retribution that might be visited upon them if larger numbers were affected.

Courts can take no better measure to assure that laws will be just than to require that laws be equal in operation.

WHEREFORE, Amici respectfully urge that the Court grant the petition for rehearing.

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Respectfully submitted,

LAUREN C. ANDERSON, C/o National Conference of, Black Lawyers, 126 W. 119th Street, New York, N.Y. 10026, (212) 864-4000

HAYWOOD BURNS, c/o Center for Legal Education, and Urban Policy, City College of New York, New York, N.Y. 10031, (212) 690-5425

ARTHUR KINOY, c/o School of Law-Newark, S.I. Newhouse Center, 15 Washington Street, Newark, New Jersey 07102, (201) 648-5521

CATHERINE C. RORABACK, P.O. Box 935, Canaan, Connecticut 06108, (203) 824-5121

Attorneys for Amici and Amicae Curiae

The ABORTION RIGHTS COUNCIL OF MINNESOTA is a statewide organization with 4,000 members and 13,000 supporters. It is dedicated to keeping abortion legal, safe and available to all women and believes that the instant ruling will force poor women and their families to make desperate efforts to seek medical care, and that the Court has set a double standard for women on one particular kind of medical care.

The ALLEGHENY REPRODUCTIVE HEALTH CENTER in Pennsylvania provides a full range of family planning health services, including counseling, pregnancy testing and first trimester abortions. It treats 3,000 patients annually, of whom 25-30% are Medicaid recipients. It believes that poor women are once again being reduced to either putting themselves in the hands of unskilled practitioners or bearing unwanted children and protests the discriminatory denial of equal access to medical services.

The ALLIANCE FOR REPRODUCTIVE RIGHTSCINNATI has a membership of both women and men from all income levels. Its purpose is to educate women about abortion and reproductive rights as well as referring women to facilities that provide medical services. It believes that poor women deserve the same choices that the rich have and that cutting off funds for abortion means that many more women will be forced to "choose" sterilization, which is not only unconscionable but unlawful.

The AMERICAN ACADEMY OF CHILD PSYCHIATRY is an organization of 2,300 child psychiatrists throughout the country who are concerned with the advancement of medical contributions to the knowledge and treatment of psychiatric problems of children and adolescents.

The AMERICAN ASSOCIATION OF UNIVERSITY WOMEN consists of 190,000 members in 2,000 branches across the country. It joins college-educated women in advocacy, action, research and life-long learning in the areas of advancement of women, education, the community, cultural institutions and international relations. AAUW believes that the federal statute upheld by this Court impermissibly impinges on the fundamental interest of all women in reproductive choice and condones the discriminatory denial of government benefits to indigent women in need of this medically necessary service.

he AMERICAN BAPTIST CHURCHES, U.S.A. is a religious denomination composed of approximately 1.5 million members in 5,871 churches throughout the U.S. It seeks the mind of Christ on moral, spiritual, political, economic and social matters and expresses these convictions to society through its witness and ministry. It serves as advocates for powerless and disenfranchised people and, through adopted policy positions, has stated concerns favoring equality of persons regardless of economic status, adequate health care services and elective abortion procedures under terms similar to the Court's decision of 1973.

The AMERICAN ETHICAL UNION is a federation of ethical-humanist societies which believes that abridgement of civil and human liberties guaranteed by the constitution is a danger to all and that the right of every woman to self-determination insofar as continued pregnancy is concerned is among those liberties that must continue free of threat.

AMERICANS FOR DEMOCRATIC ACTION is a national membership organization concerned with public policy issues. It has 55,000 members with chapters in 27 states. ADA is especially interested in the instant case because of its long-standing concern with the rights of poor people and discrimination against minorities.

The AMERICAN FRIENDS SERVICE COMMITTEE is the social justice arm of the Religious Society of Friends in America. It is active in relief and service work, reconciliation among nations and people, and programs to overcome

Nos. 79-1268 and 79-4, 79-5, 79-491

discrimination and oppression. The AFSC has a vital interest in this litigation because of the Friends' belief in the infinite worth of each human being and the equality of all human beings in the sight of God which had led to the commitment of a significant portion of its resources to work which seeks to root out the causes of violence in our society which lie in poverty and imbalance of wealth and in the exclusion and denial of equal opportunity and rights on the basis of race and sex. It is aware that the decision to terminate a pregnancy is seldom easy and that the choice of sterilization is also a serious matter in light of its irreversibility. AFSC believes that in the end the individual must make the choice, free of coercion, including the coercion of poverty and services unavailable to those who cannot pay.

The AMERICAN HUMANIST ASSOCIATION is a religious denomination of 5,000 members throughout the U.S. based on a humanist perspective. It affirms the moral right of women to become pregnant by choice and the moral right of women to freely choose a termination of unwanted pregnancies. It opposes actions by individuals, organizations and governmental bodies that attempt to restrict and limit a woman's moral right and obligation of responsible parenthood.

The AMERICAN INDIAN HEALTH CARE ASSOCIATION represents 41 urban Indian-managed health programs and health professionals across the country. The Association acts as an advocate for the almost one million Indian people living in urban areas of the U.S., and is concerned that the Court's ruling opens the possibility of similar restrictions on Indian health program appropriations. It feels that the Court has failed to adequately consider that depriving poor women of access to abortion is both discriminatory and, as Justice Marshall said, equivalent to denial of a legal abortion altogether.

The AMERICAN JEWISH CONGRESS is a national organization of American Jews founded to protect the religious, civil, political and economic rights of Jews and of all Americans. It neither favors nor opposes abortion, but believes that the decision either to undergo or forego an abortion must be personal and uncoerced by government. It is firmly convinced that a law which denies the abortion procedure to poor and underprivileged women under circumstances where abortion is necessary to protect their health and welfare violates our constitution's guarantees.

The AMERICAN PSYCHIATRIC ASSOCIATION is the nation's largest organization of qualified doctors of medicine specializing in psychiatry. Almost 26,000 of the nation's approximately 33,000 psychiatrists are members and it is deeply committed to the assurance of quality medical care for all Americans. It believes that the provision of medically necessary abortions is an important aspect of such care and that to deny appropriate care solely on the basis of a woman's inability to pay is a fundamental denial of basic human rights.

The AMERICAN PSYCHOLOGICAL ASSOCIATION, a non-profit scientific and professional organization with 50,000 members, has been the major association of psychologists in the U.S. since 1892. Its purpose, as reflected in its by-laws, is to "advance psychology as a science and profession, and as a means of promoting human welfare . . ." For more than a decade, it has been explicitly committed to the right of women to bear children. Psychological research indicates that there are significant long-term negative consequences to the mental health of women who raise unwanted children and to the unwanted children themselves. The risk of such an impact on the psychological well-being of women and children is significantly increased when therapeutically necessary

abortions are, in effect, denied indigent women.

The AMERICAN PUBLIC HEALTH ASSOCIATION is a national nongovernmental organization whose purpose is to protect and promote personal and environmental health. With a membership of over 50,000, it is the largest public health organization in the world. Within this membership, both professional health workers and consumers act in a leadership role to develop a national policy for the provision of equitable, quality health care for all citizens.

The ASIAN-AMERICAN LEGAL DEFENSE AND EDUCATION FUND is a non-profit corporation established under the laws of the States of California and New York to assist Asian- Americans throughout the nation in the protection of their civil rights through the prosecution of lawsuits and dissemination of public information. It is the Fund's expectation that many women and families in Asian-American and minority communities will be discriminatorily deprived of substantial personal liberty rights by the denial of Medicaid funded abortions.

The ASIAN AND PACIFIC WOMEN'S CAUCUS OF WASHINGTON STATE seeks to eliminate the barriers which prevent women of Asian/ Pacific ancestry from entering the mainstream of society in the areas of education and employment, housing and healthcare. It acts as an advocate on these issues as they relate to Asian/Pacific women and is comprised of women of all ages from different Asian ethnic backgrounds, both foreign-born and American- born.

ASIAN WOMEN UNITED, a non-profit membership organization established under the laws of the State of New York, is composed of Asian and Pacific Island women who are dedicated to working towards a society free from race and sex discrimination through a variety of community education programs. It supports the constitutional right of all women to choose abortion regardless of their ability to pay and supports the right of all women to make decisions regarding their own health.

The ASSOCIATION OF COMMUNITY ORGANIZATIONS FOR REFORM NOW is an organization of 30,000 low and moderate income families in 20 states formed to advance the concerns of low and moderate income people in every area. It is concerned about the impact of this decision on poor women in particular, and on the application of the equal protection doctrine as it pertains to economically deprived citizens in general.

The ASSOCIATION OF LEGAL AID ATTORNEYS OF THE CITY OF NEW YORK, DISTRICT 65, UAW, is a staff union for all attorneys employed by the Legal Aid Society of New York City. It is the collective bargaining agent for nearly 600 lawyers who have committed their skills to the representation of poor people in both criminal and civil matters. It recognizes the need for free and low-cost medical assistance and is vitally committed to the existence of a statutory structure which allows its client community to be able to be eligible for funded abortions.

The ASSOCIATION OF PLANNED PARENTHOOD PHYSICIANS is a New York-based not-for-profit corporation and the successor to the American Association of Planned Parenthood Physicians. It was formed for scientific, educational and charitable purposes and specifically to promote the ongoing interest in family planning in order to improve the stability and health of the family through responsible parenthood. It has 807 members, all of whom are physicians or other health professionals associated with family planning.

Nos. 79-1268 and 79-4, 79-5, 79-491

The ASSOCIATION OF RAZA MENTAL HEALTH ADMINISTRATORS, DIRECTORS AND ADVOCATES is a statewide network dedicated to development of mental health programs and services for Raza in California. The Association supports the right of every woman to choose whether or not to continue a pregnancy and supports federally financed abortions for low-income women.

The ASSOCIATION FOR WOMEN IN PSYCHOLOGY is a not-for-profit scientific and educational organization which encourages research directed toward alternatives to stereotyped sex roles. It has over 2,000 members, women and men.

The ATHLETIC ASSOCIATION FOR WOMEN is a member of the WomenSports Foundation. It is an organizing group to educate and activate feminists and women athletes which supports a woman's right to control her own body. It believes the Hyde Amendment links class and sex and keeps poor women at a terrible disadvantage.

The ATLANTIC COUNTY WOMEN'S CENTER- ABUSE CENTER in Northfield, New Jersey, provides shelter, counseling, advocacy and referrals for women who are victims of domestic violence. They feel that the denial of abortion funding is particularly discriminatory to the large percentage of their clients who are welfare recipients because it would place prohibitive restrictions on women who are frequently abused during pregnancy. Without the option of abortion, these women would be forced to stay with their abuser, or deliver a potentially handicapped child due to the abuse, or have a child they may not be able to care for when a divorce is the only solution.

BAY AREA WOMEN AGAINST RAPE in Berkeley carries out various programs to meet the needs of victims of rape, incest or child sexual assault. It believes that the Hyde Amendment's denial of federally funded abortions has an adverse effect on its clients. The pressure to immediately report a rape in order to receive an abortion puts undue stress on the rape survivor that may deter her from seeking the medical and emotional care she needs. For a child who has been sexually assaulted, this is compounded by her fear of not being believed. Forcing a young woman to have a child by a family member can lead to emotional difficulties for the child and the destruction of the family involved. The instant decision not only limits the ability of all women to choose an abortion but also limits a rape survivor's or incest victim's right to choose not to have a child conceived during a sexual assault.

The BERKELEY WOMEN'S HEALTH COLLECTIVE offers low-cost, quality health care to women and children with the majority of its clients coming from the San Francisco Bay area. It believes low-cost and free abortions are imperative to women's health care. Since many of its clients are low-income women, it fears that self-abortion and "back street" abortions will cost many women their health and possibly their lives. It believes that the right to abortion must include its financial availability to all women.

BIRTHWAYS is a non-profit community organization serving pregnant women and new parents in Oakland, California. It is concerned that all women have the right to continue or to terminate their pregnancies and believes that the instant decision is unfair to poor women and does not allow equal choice for all.

The BLACK AMERICAN LAW STUDENTS ASSOCIATION has a membership of 75,000 students at 163 law schools. It is particularly disturbed by the denial of equal protection to poor Black women inherent in the denial of their right to

Nos. 79-1268 and 79-4, 79-5, 79-491

choose abortion.

The BLACK PANTHER PARTY is an organization dedicated to working for political, economic and social change for poor people in the U.S. Based in Oakland, its members work with groups all over the country. It sees the instant decision as a denial of the constitutional right to abortion and a clear attack on the rights of the poor to health care and reproductive freedom.

The BLACK WOMEN'S AGENDA is an educational, research and advocacy group in the District of Columbia which addresses the needs of Black women and their families and is especially tuned in to the legislative process. It believes that the recent ruling will adversely affect many Black women because a disproportionate number of poor women in this country are Black.

B'NAI B'RITH WOMEN is a Jewish women's organization representing 130,000 members in the U.S. It was founded to promote the highest interests of humanity through educational, charitable and religious programs. It advocates freedom of choice for women and believes that the Court's ruling on Medicaid financed abortions places in jeopardy the health and welfare of a large segment of the population by denying abortions to poor women.

The BOSTON MOBILIZATION FOR SURVIVAL is part of a nationwide network committed to social change. It represents a core group of 35 activists with ties to over 3,000 people, and one of its goals is meeting human needs. It believes lack of funding for abortion affects the right of all women to define and control their own lives and particularly discriminates against women without financial resources.

The BOSTON PEOPLE'S ORGANIZATION is a multi-issue organization working on neighborhood empowerment with 250 dues-paying members. Its concern is that the right to decide of low income women be defended.

BUENA VISTA WOMEN'S SERVICES provides gynecological, counselling and abortion services to women in the San Francisco Bay area. It provides approximately 1,500 abortions annually, mostly to women in the low to middle income levels; at least one-third of its patients are Medi-Cal recipients, many of them teenagers. It feels that many women will seek cheap, illegal and unsafe abortions if the procedure is no longer covered by federal and state funds or that women who cannot afford to pay may wait longer in their pregnancy before seeking help, thereby increasing the risk to their lives. It sees the decision not to fund abortions as endangering the lives of many thousands of women who could have had a safe and legal abortion if they only had enough money to afford one.

The BUFFALO WOMEN'S LIBERATION UNION is active in work around women's issues, reproductive rights, rape and gay rights in New York. It believes that the right to choose should not be denied on the basis of a woman's inability to pay and also fears that women will be forced into sterilization if they cannot presently afford to have children.

The BOSTON AREA CHAPTER OF THE NEW AMERICAN MOVEMENT is an affiliate of a national socialist-feminist organization committed to reproductive freedom for everyone.

The BOSTON WOMEN'S HEALTH BOOK COLLECTIVE does education and organizing for women's health and sexuality. They have written and published Our Bodies Ourselves and Our Bodies Our Children which have been widely distributed throughout the U.S. and the world.

The CALIFORNIA UNION OF HEALTHCARE PROFESSIONALS, SEIU, LOCAL 723, is a newly chartered collective bargaining representative engaged in organizing drives involving approximately 6,000 healthcare professionals. It believes that there is no acceptable legal theory or emotional rationale to take the country backwards to the frightening and inequitable era prior to the general availability of funded abortions, when approximately 10,000 women a year died from the complications of illegal operations and many more were permanently maimed. It is committed to the existence of a statutory structure which makes all women eligible for abortions.

The CALIFORNIA RAZA HEALTH ALLIANCE is a statewide network of Raza health providers, advocates, researchers and consumer organizations who speak on behalf of Raza health needs. It supports the right of all low-income women to federally- financed abortions with no restrictions.

The CALIFORNIA RURAL HEALTH FEDERATION is a consortium of health centers throughout California established to serve the needs of low-income migrant seasonal farmworkers and other rural poor. It views medical care as a right and believes that, to ensure equity in health care, federal funds should be available to poor women who seek abortions.

The CALIFORNIA URBAN INDIAN HEALTH CENTERS, INC., a consortium of nine urban Indian-managed health clinics, acts as an advocate for California's 150,000 urban Indian people and for all of California's 100,000 Indian women in connection with health care issues. As an organization responsible for the health of Indian women, it agrees with Justice Marshall that denial of a Medicaid funded abortion is equivalent to denial of a legal abortion and believes that Indian women and all poor women are entitled to safe, legal abortion.

CALIFORNIA WOMEN LAWYERS is a statewide bar association whose members include male and female lawyers, judges and law students. Its primary purpose is to advance women in the law profession, to improve the administration of justice, to better the position of women in society, to eliminate all inequities based on sex, and to provide an organization for collective action and expression. It believes that the instant case has implications for all the above concerns.

The CALIFORNIA WOMEN'S HEALTH NETWORK has 340 members, primarily women and women's health organizations. Its purpose is to link women and women's health organizations throughout the state, share information and skills, and do statewide strategizing on specific issues. It is particularly concerned that the Court's decision threatens the rights of women, poor people and minorities and is an abandonment of women's constitutional right to control their own bodies.

CATHOLICS FOR A FREE CHOICE is a national organization, including priests and nuns, with members in 40 states as well as the Republic of Ireland. It is dedicated to the principle that women have the right and duty to follow their conscience regarding decisions on contraception and termination of pregnancy, and that the law has a corresponding right and duty to make it possible for

Nos. 79-1268 and 79-4, 79-5, 79-491

them to implement their choices under medically safe conditions.

The CEDAR RAPIDS CLINIC FOR WOMEN in Iowa provides birth control counseling and services, testing for pregnancy and venereal disease and early abortions. It serves 1,200 people annually and is the only provider of such services in the county. Although it has always made an effort to provide services for women who cannot afford them, and established a medical aid fund to this end, it anticipates that it will not be able to meet the needs of all the women who will be unable to pay for an abortion.

The CENTER FOR ELIMINATION OF VIOLENCE IN THE FAMILY provides a variety of services for battered women and their children in New York City. As an organization working to help women free themselves of abusive situations, become more independent, assertive and self-confident, it sees the denial of medicaid funds for abortion as another assault on women's right to self-determination and protests it as yet another form of victimization and abuse.

The CENTER FOR MEDICAL CONSUMERS is a national organization with 2,000 members across the country which provides information so that people may adequately evaluate the advice and recommendations they receive from the medical profession.

The CENTER FOR WOMEN POLICY STUDIES is a non-profit, tax-exempt organization working to identify, analyze and propose solutions to problems related to the status of women. Studies conducted at the Center, located in Washington, D. C., on consumer credit for women, rape, female offenders, and family violence have aimed at increasing the availability of basic services to women. It believes that funding for abortion would protect the fundamental personal liberty of poor women to choose when and where to have children.

CENTRO PARA IMMIGRANTAS in Houston provides legal services to immigrants. It services over 200 people a month and is concerned with the rights of all poor people.

The CHELSEA WOMEN'S HEALTH TEAM is a woman's clinic in Manhattan serving women of all ethnic and economic backgrounds. It provides both primary health care and birth control services and views the Hyde Amendment as snatching the right to choose abortion away from poor women who may, in order to get an abortion, have to spend more money than they would use in weeks to buy food for the children they already have. It is concerned that more women will become entrapped in roles they did not choose or kill themselves by home abortions because they could not afford safe ones.

The CHICANA FORUM is organized to promote the interests of Mexican-American women and alleviate the problems of U.S.- Mexican border relations. They view the problem of Mexican women fleeing to the U. S. and bearing unwanted children as exacerbating the problems of immigrant women. Hispanic women, because of ethnic traditions, do not report cases of rape and incest in time to comply with reporting requirements and therefore cannot exercise their right to safe and legal abortion.

The CHICANA SERVICE ACTION CENTER was established to provide California Chicana leadership and advocacy on women's issues and an opportunity for employment training and skills development for economically disadvantaged women. It supports access to federal funding for abortion for all low-income women.

Nos. 79-1268 and 79-4, 79-5, 79-491

The CHICO FEMINIST WOMEN'S HEALTH CENTER is a woman-controlled, non-profit organization which operates a clinic offering pregnancy screening, abortion and well- woman services to the women of Northern California. As the major provider of abortion services in California north of Sacramento, it sees women of all racial, ethnic, and socioeconomic backgrounds from a wide geographical area. It believes that the right to safe and legal abortion is the cornerstone of every woman's reproductive freedom and therefore imperative if she is to control her own life.

The CHILDREN BY CHOICE COALITION OF SAN MATEO COUNTY has a membership of over 200 individuals and organizations in California dedicated to the principle that all women, regardless of where they live or what their income, have the right to implement any decision concerning when and if to bear a child.

The CITIZEN'S COMMITTEE FOR CHILDREN OF NEW YORK, INC. is a watchdog organization of 175 members which monitors services and investigates conditions in insitutions and agencies dealing with children in both the public and private sector. It supports the right of all women to choose to have or not have an abortion.

The CLEVELAND RAPE CRISIS CENTER is the only rape crisis center in Cuyahoga County. It services upward of 1,200 victims a year, providing direct services and advocacy to victims of rape and their families as well as educational programs to the general community. It is a non- profit, tax-exempt organization whose clients come from every socioeconomic group, race and profession. Three to five percent for rape survivors will become pregnant. They have been involved in a life- threatening situation over which they had no control, and it is vital to their mental health that they resume control where possible. The instant ruling jeopardizes their feelings of control and can prolong their recovery time enormously because of the imposition of another stressful situation in which they may feel helpless.

The COALITION FOR ABORTION RIGHTS EQUALITY is a Santa Clara County, California, network of organizations and clinics dealing with women's health care and committed to assuring safe, legal abortions for all women regardless of socioeconomic status. It sees the cutoff of funding as discriminatory and virtually denying legal abortions to indigent and minority women, thus placing their lives in danger.

The COALITION FOR ABUSED WOMEN, INC. is a private, non-profit organization of lawyers, social workers and interested community persons who assist battered women and victims of rape, incest and sexual assault to effectuate their legal rights and personal choices. Located in Nassau County, New York, it serves residents in a county of 1.4 million people. The Coalition's clients are poor, welfare mothers and women without actual access to family monies. Many women are battered during pregnancy, or pregnant as a result of rape or incest, and the Coalition supports a woman whether she chooses to carry the pregnancy to term or to terminate it. The recent Court decision effectively strips poor women of the ability to terminate a pregnancy and is a serious portent of the future diminution of the rights of all women.

The COALITION FOR A PEOPLE'S ALTERNATIVE IN 1980 is a group of several hundred organizations and individuals across the country committed to ensuring basic human and civil rights. The right of poor women to choose abortion is one such right which the Coalition strongly supports.

The COALITION FOR CHOICE in Memphis is a group of organizations and individuals from Tennessee, Arkansas and Mississippi working to preserve women's reproductive rights and safe, legal abortion in Tennessee. Memphis is the center of a poverty-stricken region, and women bear the additional expense of travelling there in order to obtain a safe abortion. Denial of public funding will make choice impossible for these women.

The COALITION FOR THE MEDICAL RIGHTS OF WOMEN/COMMITTEE TO DEFEND REPRODUCTIVE RIGHTS has 1,000 members in the San Francisco area who are committed to improving the quality of medical care for women. It believes in the right of all women, rich or poor, to choose whether or not to have a child and that lack of access to that right is a limitation on reproductive choice for poor women. It views abortion as a medical procedure which should not be isolated from the rest of the Medicaid program.

The COALITION OF LABOR UNION WOMEN is a national membership organization of women and men who are members of labor unions. It has 30 active chapters throughout the country with members from more than 65 International Unions and is dedicated to increasing the participation of women within their unions and to removing all forms of discrimination in the workplace. CLUW has long supported the right of all women to choose.

The COLUMBIA COUNTY WOMEN'S RESOURCE CENTER is a small, locally funded organization staffed by volunteers which deals with problems of rural women. It concentrates on providing crisis services for victims of domestic violence and is devoted to expanding options for women. It believes that poor women have the right to choose an abortion.

The COMISION FEMENIL MEXICANA NACIONAL, with 2,000 members, is committed to furthering the interest of the Mexican-American community nationwide. It has initiated litigation against the State of California and doctors and hospitals to remedy sterilization abuse and has fought for California's sterilization regulations -- the first laws passed in the nation. It was also a plaintiff in the suit which enjoined California from implementing restrictions on Medi-Cal funded abortions.

The COMMITTEE FOR ABORTION RIGHTS AND AGAINST STERILIZATION ABUSE has a constituency of 1,000 people and several hundred active members working in communities in New York and New Jersey to educate and organize around the issues of reproductive freedom. It also works to bring about legislation which would provide all women with unimpeded access to abortion, safe and reliable contraception and a decent quality of life in which people can raise their children.

The COMMITTEE OF INTERNS AND RESIDENTS is a union representing more than 4,000 physicians in New York and New Jersey. Many of its patients rely on Medicaid to pay for their health care. It has seen the awful, sometimes fatal, results of the lack of access to good health care, including abortions and knows that its patients will suffer and die as a result of the Court's decision.

The COMMITTEE TO END STERILIZATION ABUSE is an organization in New York with affiliated members in six cities. Composed primarily of women, particularly Black, Native American, Puerto Rican, Mexican and women on welfare, its commitment is to publicize and educate around sterilization abuse and to end such abuse by means of guidelines, demonstrations and exposure of instances of

abuse as well as to expose the use of sterilization as a means of population control. Women who have been denied abortions may be talked into unwanted sterilization. To curtail this coercion, other options must be available, including funded abortions.

COMMUNITY HEALTH ADVOCATES is an organization of health care professionals, workers and activists in St. Louis concerned with quality health care for all people, including freedom of choice for women and safe, legal abortion.

The COMMUNITY LAW PROJECT is a public interest law firm specializing in domestic relations law and serving primarily women and low-income people. It takes the position that women who are Medicaid patients have the same right to choose abortion as their better-off sisters, and any government restriction on Medicaid funding infringes on all women's rights, particularly poor women.

The COMMUNITY SERVICE SOCIETY is a citywide organization serving 15,000 people in New York City. It provides services to the elderly and the young, technical assistance to community school boards, and does legislative work around issues of health, housing, education, family support and juvenile justice to improve the conditions of the poor and increase their options for survival. For the past three years it has supported the struggle to maintain Medicaid abortions.

The CONNECTICUT WOMEN'S EDUCATION AND LEGAL FUND, INC. is a public interest law firm which specializes in sex discrimination. Its clients, members and supporters are concerned with the rights of women, especially those who are poor, including the right to freedom of choice in the area of health and reproduction.

The COORDINATING CENTER FOR WOMEN IN CHURCH AND SOCIETY OF THE UNITED CHURCH OF CHRIST is a 32-member policymaking board charged by the 1.8 million member United Church of Christ with addressing the concerns of women and eliminating sexism in the church and society. It recognizes the right of all women to choose a health preserving, therapeutic abortion and deplores actions which discriminate against poor women in need of abortion.

The COUNTY WELFARE DIRECTORS ASSOCIATION is a non-profit organization representing the County Welfare Departments in all 58 counties of the State of California. It has the administrative responsibility for the delivery of public social services in California, including social services, financial assistance, food stamps and Medicaid. It very much fears that the severe restrictions on the use of Medicaid funds for abortion will result in a significant increase in illegal abortions with all the associated ills that implies.

The CHARLES HOUSTON BAR ASSOCIATION was established to advance the interests of Black attorneys in northern California. It has a continuing interest in addressing the myriad problems facing Black people and meets that objective by participation in various activities including community outreach and political action. It is engaged in constitutional and public interest litigation in an effort to correct the injustices which have been suffered by Black and poor people.

The CHRISTIAN CHURCH (DISCIPLES OF CHRIST) DEPARTMENT OF CHURCH WOMEN OF THE DIVISION OF HOMELAND MINISTRIES is a Protestant denomination comprised of over 1.2 million members. It has proclaimed that in Christ, God affirms freedom

Nos. 79-1268 and 79-4, 79-5, 79-491

and responsibility for individuals and has therefore resolved to affirm the principle of individual liberty, freedom of conscience and sacredness of life for all persons, to respect differences in religious beliefs concerning abortion, and oppose any attempt to legislate a specific religious opinion or belief concerning abortion.

The CLEVELAND PRO-CHOICE ACTION COMMITTEE is a political action and educational group which believes that abortions should be available to all women regardless of their ability to pay.

The DETROIT ALLIANCE FOR A RATIONAL ECONOMY is a multi-racial, ethnically mixed, mass-based community and political organization. It deals with legislative issues in city government that impact on the community, including the provision of quality health care services.

DISTRICT 65, UAW, is a labor union of 35,000 members in 22 states, Puerto Rico and Canada, which represents both blue and white collar workers in diverse industries, including textile, publishing, education, cosmetics, corrugated, legal services and retail. Founded during the depression of the 1930's, it is today known for its broad-ranging health and welfare programs which provide the best in medical care to its membership without regard to differences in income and skill. Its reputation rests largely upon its commitment to struggles for equality and social justice. That commitment is reflected in District 65's deep conviction that the availability of medicaid funds for abortion must be available in order to give poor women the same rights as rich women.

DISTRICT 1199, NATIONAL UNION OF HOSPITAL AND HEALTH CARE EMPLOYEES, AFL-CIO, represents 100,000 health care workers nationwide. Its membership is predominantly Black, Latin and female. District 1199 is deeply involved in efforts to improve the quality of health care and to extend health care to all people. These efforts include support for the right of women to make free choices with regard to child bearing and the opportunity for women to freely utilize, without economic coercion, the necessary medical procedures to effectuate such choices.

The DOMESTIC VIOLENCE PROJECT, INC. in Ann Arbor, Michigan, is an agency providing temporary emergency housing for battered women and their children. Its work in the area of family violence has shown how economic status affects a woman's ability to leave her spouse and become independent. It therefore recognizes the urgent need for the availability of free or low cost abortions to poor women knowing that even one more child can mean the difference between a woman being trapped in a battering situation or going on to live in a violence-free environment.

EDUCATION FOR FREEDOM OF CHOICE IN OHIO is an organization which provides public education on the need to maintain safe, legal abortion for all women.

EMERGE: A MEN'S COUNSELING SERVICE ON DOMESTIC VIOLENCE is located in Boston and deals with the problem rooted in the belief that men have the right and responsibility to dominate and control women and, if they cannot, they have the right to use violence as the means of enforcing such control. To deny women the right to choose, to make a decision which will drastically affect their lives and the lives of their unborn children, is rooted in the very same belief that sanctions violence against women.

Nos. 79-1268 and 79-4, 79-5, 79-491

The EMORY UNIVERSITY CENTER FOR WOMEN'S INTEREST LAW operates a legal referral service for Atlanta women and also does pro bono research for private attorneys and organizations in order to help assist women in need of legal help. It is aware of the need for low-cost medical services and is deeply offended by the Court's transformation of a woman's right to choose into a "paper" right.

EQUAL RIGHTS ADVOCATES, INC. is a public interest law center in San Francisco specializing in issues of sex- discrimination. It has a long history of interest, activism and advocacy in all areas of law which impact on equality of the sexes and is co-counsel for plaintiffs in Coalition to Defend Reproductive Rights v. Myers, S.F. No. 24069, currently pending before the California Supreme Court, challenging the State restrictions on funding for abortions under both federal and state law. The instant case will have both practical and legal implications on such case.

The FAMILY ADULT SHELTER is a program serving Ulster County, New York. It provides shelter, advocacy and supportive services to victims of domestic violence and often serves both poor and teenage women who need access to safe, legal abortion.

The FANNY LOU HAMER HEALTH CLINIC is a non-profit health clinic which provides family planning services, but not abortions, to low-income individuals. It receives approximately five to six patients a week, mainly women, and advocates women's right to control over their own bodies as an essential component of quality health care.

FEDERALLY EMPLOYED WOMEN, INC. is a private, non-profit organization with 238 chapters and 7,000 members in 45 states, the Canal Zone, Japan, Germany and Guam. It is dedicated to enhancing the status and full utilization of women in the federal government through increasing job opportunities, improving the merit system and taking action to end sex discrimination. FEW is the only independent national organization solely concerned with helping women achieve equal opportunity in federal service. It sees freedom of choice as part of its agenda and one of its basic areas of interest.

The FEDERATION OF ORGANIZATIONS FOR PROFESSIONAL WOMEN is a national coalition of scientific, professional and technical groups committed to attaining equal opportunity for women in education and employment. Founded in 1972, it has a policy of support for reproductive freedom which includes access to abortion services for poor women. It recognizes that economic restrictions on public funding for abortion undermines the right to choose as an option and creates a double standard of health care which is destructive to the basic civil rights and welfare of poor women, and that the physical, psychological and socioeconomic consequences of the unwanted childbearing that results provide major barriers to the improvement of women's status.

The FEDERATION OF PROTESTANT WELFARE AGENCIES, INC. is a voluntary, non-profit organization which, through its more than 300 member agencies, provides a variety of health and social services to more than one million New Yorkers, including the aged, ill, mentally and physically handicapped and families in need of support services. In its supportive and coordinating role as consultant to its member agencies, the Federation has a strong interest in promoting policies and principles of law which ensure that the rights of the clients are protected and that the highest quality of service is made available to the disadvantaged and those in need of assistance. The majority of the

clients served by member agencies of the Federation are individuals entitled to Medicaid benefits, and full access to high quality health service is affected by the Court's decision.

The FEMINIST HEALTH WORKS, the only full-time woman's health center in New York, provides counseling, education, information and referral services to women and organizations in the areas of gynecological, sexual and preventive health. It receives 30 to 40 calls each day from women with pregnancy-related problems. Many of the women it counsels are seeking abortions because information about family planning was not available to them, or because of failed birth control. Many of these women state that if they cannot obtain an abortion they will abort themselves, regardless of the risk to their own lives. It sees the need to provide quality abortion care as a necessary part of quality health care for all women.

The FEMINIST PARTY is a national women's organization with 20 state chapters dedicated to improving the lives of all women.

The FEMINIST WOMEN'S HEALTH CENTER is a woman-controlled clinic providing health care, including abortion services and health education, for women from Atlanta and surrounding areas. Approximately one quarter of the women it sees for abortion are medicaid recipients. It is concerned about the recent attacks on abortion rights because without this most basic control over reproduction women can have no control over their lives and are subject to exploitation. Additionally, it views the Court's ruling as saying that constitutional rights exist only for those who can pay for them.

The FINANCIAL WOMEN'S ASSOCIATION OF NEW YORK is an organization of leading members of the New York financial community, both women and men. It helps to advance and maintain high professional standards for women pursuing careers in finance and to attain greater recognition for women's achievement in business. The Association strongly believes that all women, regardless of their income, must have the opportunity to make their own choices about childbearing.

The FOUNDERS CLINIC, INC. provides first trimester abortions, counseling, birth control and free pelvic examinations for women in Columbus, Ohio. It believes that abortion should be a woman's choice, safe and legal, and that women should not be discriminated against because they are poor.

FREEDOM OF CHOICE-MIAMI VALLEY is a coalition of 18 organizations and 150 individual members in Dayton, Ohio, which advocates, protects and promotes the right of each individual to maintain control over his or her reproductive life, including the right to choose abortion. It recognizes the urgent need for continued availability of legal abortion for all women regardless of income and is opposed to restrictions on funding.

FREEDOM OF CHOICE-OHIO is a statewide coalition of pro-choice organizations with 57 member organizations and individual members. Its purpose is to represent a unified pro-choice position in Ohio, to disseminate information, and to be a resource to the legislature and media.

The FAMILY PLANNING COUNCIL OF WESTERN MASSACHUSETTS, INC. serves approximately 10,000 people each year who voluntarily choose family planning services, 94% of whom are in need of some subsidy. As its mission is to assist individuals in making voluntary decisions about fertility, it finds it

Nos. 79-1268 and 79-4, 79-5, 79-491

repugnant that Medicaid women would not be able to exercise this right. Since contraceptive technology is not perfect, the availability of abortion is essential.

GAY AND LESBIAN ADVOCATES AND DEFENDERS is a Boston-based organization of legal workers and lawyers concerned with sexual and reproductive freedom and privacy for everyone and advocates repeal of all repressive legislation in these areas.

The GAY POLITICAL CAUCUS, with a constituency of 8,500, including gay men and women, provides education about gay people's lifestyles, works to remove discriminatory legislation, and supports candidates who further these goals. It is always concerned about discrimination in any form, and deplores the instant decision because it discriminates against those of lower economic status.

The GRAND JURY PROJECT is an organization dedicated to increasing public awareness about the proper function of the grand jury process. In its work it has seen how specific laws affecting women percolate out into every aspect of how the law broadly affects women's lives. Many grand juries have resulted from attacks on women's health clinics and abortion clinics and these grand jury investigations have often become unprofessional and legally unjustifiable attacks on the clinics. These attacks are in part a result of the courts' denial -- and the endorsement of that denial by others -- of every woman's unqualified right to a safe, legal abortion. This situation will be corrected only when it is recognized by the law that every woman, regardless of economic status, has the same right to an abortion that any person has for any other medical service.

The HARRIS COUNTY DEMOCRATS is an organization with 1200 members which is dedicated to equal rights for all. It believes that a democratic society must represent the poor, and that the instant decision both discriminates against the poor and against minorities, since minority groups constitute a disproportionate percentage of the poor.

The HARRIS COUNTY WOMEN'S POLITICAL CAUCUS is a broad-based organization whose purpose is the education and election of women in the political process. It is concerned about the recent decision because it adversely affects those politically unrepresented women who lack the money to protect themselves in the area of reproductive freedom.

The HEALTH COALITION FOR AFFIRMATIVE ACTION is an organization of health care professionals and workers in the New York City area committed to equal access to health care services.

HEALTHRIGHT, INC. is a women's health education organization which as part of its activities publishes a quarterly magazine which has 2,000 subscribers. It believes that all women have a constitutional right to accessible health care and that the Court's decision denies this right to a large number of women. As an organization dedicated to the health of all women, it recognizes that this decision jeopardizes the health and lives of all poor women in the U.S.

The HUMAN SERVICES ALLIANCE is a coalition of approximately 15 citizens' organizations in Roseburg, Oregon, which are concerned about the provision of essential services, including health care, to all people regardless of economic status.

The INDIAN RIGHTS ASSOCIATION is the oldest advocacy group for Indian rights in the country. It has approximately 1,100 members drawn nationally from all 50 states. Historically it has championed the legal and moral claims of American Indians and sought to educate the non-Indian public on such matters. Health care for Indians today is inferior to the national average; that Indian women, statistically among the poorest people in this nation, should be generally prevented from exercising a constitutional right to abortion is abhorrent to every principle of equal protection.

The INSTITUTE OF THE BLACK WORLD is a network of more than 200 associates who are scholars and/or social activists in the U.S., the Caribbean and Africa. It carries on programs of research, analysis, advocacy and education on the history and prospects of the Black struggle for freedom, human dignity and social justice in America. It is deeply concerned because of the Court's decision and its impact on the health and welfare of Blacks and poor people and its reinforcement of the racist tendencies of the society which create a double standard of justice for the rich and the poor, the white and the black.

The INTERNATIONAL SOCIALIST ORGANIZATION is a political organization with 10 chapters throughout the country. It is concerned with every facet of women's liberation of which reproductive rights are key.

The INTERNATIONAL UNION OF ELECTRICAL, RADIO AND MACHINE WORKERS, AFL-CIO-CLC, (IUE) is a labor organization composed of approximately 625 local unions with a membership of approximately 300,000 working men and women, 120,000 of whom are women. The IUE and its affiliated local unions represent employees nationwide for the purposes of collective bargaining with respect to wages, hours and other terms and conditions of employment.

The INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE AND AGRICULTURAL IMPLEMENT WORKERS OF AMERICA is a labor organization which represents more than 4 1/2 million people throughout the U.S. and Canada. For many years it has been in the forefront of legislative efforts to obtain quality health care for all individuals in America regardless of race, sex and socio-economic status and played an important role in the development and passage of the original Medicare and Medicaid programs. During the present economic recession, many of its laid off members and their families must rely on Medicaid for their health care needs. It believes that unless the decision to uphold the Hyde Amendment as constitutional is reversed, the Court will have sanctioned a distortion of the guarantee of equal protection under the law and endorsed a devastating and unconscionable government decision to economically coerce poor women to refrain from exercising their constitutional right to abortion.

The JUVENILE RIGHTS PROJECT in Oregon is a statewide organization dedicated to upholding the rights of children. It is funded by the federal and state governments and by private sources as well.

LAS AMIGAS, INC. is an organization of Black professional women with 25 chapters in 12 states involved in civil and cultural work. It is concerned with the effect on Black and other minority women of the elimination of Medicaid funding for abortion.

LAS MUJERES FOR POLITICAL ACTION is a group of 300 Hispanic women in California committed to recruiting, training and supporting Hispanic women for state and federal offices. Its constituency is minority women and thus it has

Nos. 79-1268 and 79-4, 79-5, 79-491

a great stake in any cuts in funding for health care provided to poor women.

LATINAS IN HEALTH AND HUMAN SERVICES is an organization of southern California women dedicated to expansion and improvement of quality health and human services for Latinas through education, research and political activity. It believes that every Latina has the right to quality health services including federally financed abortions.

The LAW STUDENTS CIVIL RIGHTS RESEARCH COUNCIL in Atlanta has assisted the efforts of every major civil rights, civil liberties and public interest organization in America. It has a constituency and outreach which cuts across every racial, ethnic, social and political group, and its programs are organized in every region of the country with law school participants from throughout the U.S.

The LEAGUE OF WOMEN VOTERS OF THE U.S.A. is a non-partisan, non-profit, tax-exempt membership corporation with a current membership of 123,000 in 1,328 state and local leagues in every state, the District of Columbia, the Virgin Islands and Puerto Rico. It has several guiding principles, including that no person or groups should suffer legal, economic or administrative discrimination. Its members believe that the federal government has a responsibility to provide income assistance and supportive services to meet the basic needs of all disadvantaged persons. Therefore, it opposes any cutoff of Medicaid funding for abortion and believes that such action discriminates against economically disadvantaged women.

LESBIAN/GAY CAUSE OF BUTTE COUNTY is a political organization working on issues concerning lesbians and gay men in California. It sees the fight for women's rights to control their reproductive lives as part of its struggle and the recent decision upholding the Hyde Amendment as severely undermining those rights.

The LOS ANGELES CHILDBIRTH CENTER serves women from all ethnic and economic groups and provides low-cost, quality home birth, prenatal and childbirth education services to women and families. It believes in the rights of women and families to make choices about their reproduction free from outside pressures and that the right to choose the method of childbirth is the same as the right to choose an abortion. It is particularly concerned about low-income and minority women who have few options, whether it be around childbirth or abortion, and holds that women should not be forced into a childbirth because they cannot receive funding.

The LOS ANGELES FEMINIST WOMEN'S HEALTH CENTER is an abortion clinic providing abortion care for over 150 women a month. In its constant contact with women seeking abortions it speaks to and sees countless women who need public funding. Denial of these funds forces women to wait until later in their pregnancies for abortions, seek lower quality abortion care, or accept the utter humiliation of bearing an undesired pregnancy.

The LOUISIANA CENTER FOR THE PUBLIC INTEREST is a non-profit public interest law firm dealing with the legal problems of the elderly and handicapped. In its capacity as a public interest advocate, it has been involved in obtaining free and low-cost medical services for its low-income client population.

Nos. 79-1268 and 79-4, 79-5, 79-491

MAINE RIGHT TO CHOOSE is a state-wide organization with more than 400 members, which works for every woman's right to decide whether or not to have an abortion. It has played an active role in the legislature in opposing bills that would limit women's right to choose abortion and in supporting appropriations for family planning. It has also participated in many public education activities throughout the state.

The MASSACHUSETTS COALITION OF BATTERED WOMEN SERVICE GROUPS consists of 18 service groups across the state. Most of their clients are either already on welfare or need to obtain it temporarily and are therefore strongly affected by the Court's decision. For women with little or no money, the right to abortion is a crucial one because raising an additional child will force them to remain on welfare, denying them the opportunity to take control of their own lives. Additionally, pregnancy often results from rape by the battering spouse and the woman may want to terminate it in order to put the violent relationship behind her.

MASSACHUSETTS LAW REFORM INSTITUTE is a federally funded, non-profit, legal services organization which supplies attorneys to represent low-income people in high impact litigation.

The MEMPHIS CENTER FOR REPRODUCTIVE HEALTH is a non-profit abortion clinic providing services to a four-state area. As a provider, it sees first-hand the hardships incurred by indigent women who can rarely obtain minimal health care and already may have several children.

The METHODIST FEDERATION FOR SOCIAL ACTION has 14 chapters across the country with 1,200 members living in almost every state and several foreign countries. It is committed to socioeconomic change and supports the rights of women to their own personal moral decision regarding abortion after thorough and thoughtful consideration. It views the denial of Medicaid funds for abortion as tantamount to saying that the rights guaranteed under our Constitution are only available to those who can afford them.

The MEXICAN AMERICAN LEGAL DEFENSE AND EDUCATIONAL FUND was established primarily to provide legal assistance to Mexican Americans and one of its major goals has been to end discrimination against Chicanas on the basis of sex and national origin. One of the most significant problems faced by Chicanas and other minority women is discrimination in health services. It has litigated numerous cases, through its Chicana Rights Project, and the resolution of the issues in the instant case will have significant impact on the health status of Hispanic women throughout the United States.

The MEXICAN AMERICAN WOMEN'S NATIONAL ASSOCIATION has members in 23 states, many of whom fall within poverty guidelines and are therefore directly affected by the cutoff of federal funding for abortions. It feels these women can no longer exercise their right to choose equally with other groups and will be forced to resort to illegal and unsafe abortions as did Rosie Jimenez who, after funds were cut off in Texas, was forced to seek and subsequently died as the result of an illegal abortion.

The MICHIGAN CITIZENS LOBBY, a non-profit corporation, is Michigan's largest consumer organization, with a membership of over 86,000 working and middle-class families throughout the state. As an organization active on health care issues, it believes that medical services should be available without discrimination

Nos. 79-1268 and 79-4, 79-5, 79-491

based on economic class.

MICHIGAN LEGAL SERVICES is a statewide program which provides legal representation to low-income individuals and organizations. For the past 12 years, it has acted as counsel to the Michigan Welfare Rights Organization and its affiliate organizations. One of its primary concerns has been to insure that recipients of public assistance, including recipients of the Medicaid program, are eligible for the full range of quality medical services available to all other persons in this country. Because of historical problems regarding the lack of access of poor people to quality medical care, including the difficulties of access to abortion-related services, it has undertaken efforts to continue the availability of abortion-related medical services to those eligible persons.

MICHIGAN WELFARE RIGHTS ORGANIZATION and its affiliates are membership organizations comprised of recipients of public assistance, including participants in the Medicaid program, and other low-income individuals. Their primary purpose is to insure that their membership receives all the benefits to which they are entitled, including the full range of medical services under the Medicaid program. Because of the lack of medical services, low-income women have been denied access to quality medical attention in situations that are life and health endangering. If these women are not allowed to receive abortion-related medical services through the Medicaid program, many members of these organizations who are unable to independently afford quality medical care will be required to seek less than adequate medical assistance.

The MIDWEST HEALTH CENTER FOR WOMEN is the only non-profit, tax-exempt, family clinic providing family planning and abortion services in Minneapolis. Its patients are generally young women with small children for whom another child could be destructive both to the mother and her children. Since the public hospitals in Minneapolis do not provide abortion services, the clinic serves a disproportionately large share of low-income and indigent women requesting pregnancy terminations and the medical interests of these patients cannot be met when funding for medically necessary abortions is eliminated.

The MIDWEST WOMEN'S CENTER is a network operating in Illinois to create links between women and services, between women's organizations and between institutions. It serves as both a women's advisor and advocate.

The MIN AN HEALTH CENTER is a primary health care facility serving primarily, but not exclusively the San Francisco Chinatown Community. It views the lack of funds for abortion as creating a health risk for pregnant women of lower economic status by forcing the woman and her family to assume financial responsibility for supporting the new offspring and thereby creating an unhealthy degree of physical and mental stress on the mother.

The MS. FOUNDATION FOR WOMEN, INC. is a national women's fund and is the only national public foundation devoted entirely to assisting women activists and self-help projects in the survival areas of health care, employment training, prevention of violence against women and children and the development of non-sexist, multi-racial education and training. It has a special commitment to support projects which bridge the divisions between race and class. Its ProChoice Project for Reproductive Freedom is the country's only foundation program whose purpose is to provide assistance to state and local groups working to maintain the right to choose abortion for every woman.

Nos. 79-1268 and 79-4, 79-5, 79-491

MUJERES LATINAS EN ACCION is an organization of Latina women operating out of Chicago which offers social services, educational programs and advocacy for women.

The MULTNOMAH BAR ASSOCIATION/LEGAL AID SERVICE represents plaintiffs in a class action federal lawsuit on behalf of all Medicaid-eligible women in Oregon who require medically necessary abortions. Presently, as a result of that suit, an injunction is in effect requiring the state to pay for all medically-necessary abortions for the class. Failure to reverse the instant decision will seriously and adversely affect the class.

The NATIONAL ABORTION FEDERATION has 175 institutional members in 39 states and 210 individual members. It is a non-profit professional organization of abortion providers and others committed to implementing high clinical standards, public education and access to quality abortion services for all women, regardless of economic status.

The NATIONAL ABORTION RIGHTS ACTION LEAGUE is dedicated to keeping abortion legal, safe, and available regardless of socioeconomic level. It has 90,000 national members plus affiliates with their own membership drawn from the pro-choice majority throughout the country.

The NATIONAL ALLIANCE AGAINST RACIST AND POLITICAL OPPRESSION has a nationwide membership of 5,000 people in 46 chapters in 32 states, as well as 156 affiliate organizations. Its multi-racial and multi-ethnic membership includes welfare mothers, handicapped and undocumented workers. Its purpose is to repel the growing repression against leaders and activists in the movements for freedom, peace and justice. The women who are affected by the Court's decision are a major part of their constituency and an attack on them threatens the organization as a whole and its struggle for freedom and justice.

The NATIONAL ALLIANCE FOR OPTIONAL PARENTHOOD, which consists of 2,000 individual persons, both parents and non-parents, promotes effective decision-making about parenthood and the option of not having children as a respected and accepted choice. It believes that whether or not to have a child is one of the most important decisions a person can make and supports the availability of abortion as well as methods of controlling fertility.

The NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE (NAACP), organized in 1909, is the oldest and largest civil rights organization in the country. It has a membership of 470,000 persons in 1,700 branches located throughout the 50 states. The principle objective of the organization is to ensure political, educational, economic, and social equality for Black persons and it endeavors to remove all barriers of racial discrimination through the democratic process. Black persons, by being effectively excluded from most areas within the system, are denied an opportunity to resist discriminatory practices and make the system responsive to their needs. The NAACP represents a tremendous number of people who are the intended beneficiaries of programs designed to provide adequate health care for each and every American. It contends that solely because of their race, disproportionate numbers of Black American citizens are unable to secure adequate health-care and benefits and it believes that the decision of this Court is not only erroneous in law but is a judicially imposed barrier to the achievement of that national health goal.

Nos. 79-1268 and 79-4, 79-5, 79-491

The NATIONAL ASSOCIATION OF COMMISSIONS FOR WOMEN is the unifying body for 140 government-created commissions on the status of women throughout the country. Through it, the local commissions play a significant role as advocates for all women on the national level. One of its focuses is working to ensure enforcement of government's responsibility to establish programs and policies to meet the human needs of women.

he NATIONAL ASSOCIATION OF FARMWORKER ORGANIZATIONS is a coalition of farmworker-governed, community-based organizations advocating the civil and labor rights of migrant and seasonal farmworkers throughout the United States. It represents groups in over 40 states whose goals are dedicated to the representation of migrant and seasonal farm-workers. NAFO recognizes the need for free and low cost medical assistance and is vitally committed to the existence of a statutory structure which will allow its client community eligibility for funded abortions.

The NATIONAL ASSOCIATION OF SOCIAL WORKERS, with 85,000 members, is the largest organization representing social workers in the nation and the world. Its members counsel and direct programs which provide services to low income persons, including free and low-cost medical assistance. It believes that the option of abortion should be available to all women regardless of income. It is concerned that lack of Medicaid funding for abortions may have an adverse impact on federal policies towards all beneficiaries and initiate a two-tier system of health care -- one for the poor, another for the rich.

The NATIONAL BAR ASSOCIATION, founded in 1925, is a professional membership organization which represents more than 12,000 Black attorneys, judges and law students. Its purposes include achieving equal opportunities for minorities in the legal profession and protecting the civil and political rights of all citizens. To effectuate its goal of racial and sexual equality, the National Bar Association, through its Women's Division, has been actively involved in issues concerning child abuse and reproductive rights.

The NATIONAL CAPITAL TAY-SACHS FOUNDATION, comprised of approximately 2,500 members nationwide, is concerned with the elimination of Tay-Sachs disease, and provides public education about this fatal illness. While it believes that every woman should have equal access to abortion, it is particularly concerned that a woman have the option of terminating her pregnancy where a fetal deformity or illness has been detected in pregnancy. The organization cannot see how the state can have any interest in bringing a child into the world who will die before the age of four.

The NATIONAL CENTER ON WOMEN AND FAMILY LAW provides legal support on women's issues and family law issues as they affect poor women. The Center serves as a network of over 3,000 attorneys, paralegals and poor women's groups. The Center is dedicated to representing the interests of poor women. Fundamental to the freedom of all women is the right to choose abortion and the right of access to abortion. In order to be assured of this basic right, poor women must continue to be eligible for funded abortions.

The NATIONAL COMMITTEE ON HOUSEHOLD EMPLOYMENT, with 43 affiliates in 22 states, serves on a national level as an organizing force and an advocate for the rights of the country's 1.3 million household workers. Household workers, most of whom are Black and Hispanic, and 98 percent of whom are women, are traditionally among this country's lowest paid and most powerless members. In

Nos. 79-1268 and 79-4, 79-5, 79-491

1979, the median total cash income for full-time household workers was \$ 3,617. In this context, and since household workers are undeniably affected by the recent ruling, the Committee stands strong in support of the rights of low-income women to federally- funded abortion.

The NATIONAL CONFERENCE OF BLACK LAWYERS is composed of 1,500 lawyers, judges, law professors, and law students. It was chartered to work towards the elimination of racism in the law and to address the legal problems of the Black community. It is particularly concerned with the discriminatory impact on poor minority women of the failure to fund medically necessary Medicaid abortions due to the susceptibility of black women to pregnancy- related complications of sickle cell anemia. It also believes that the inability of indigent Black women to choose abortion will have a long-ranging negative impact, not only on black women, but on the black family and community as well.

The NATIONAL CONFERENCE OF PUERTO RICAN WOMEN is a national organization that is seeking equal rights for Puerto Rican women and equitable participation in the economic, social and political life of the United States. Because Puerto Rican women are disproportionately represented among the poor of this country, it is concerned that this decision will have a severe impact on the lives, families and communities of Puerto Rican women.

The NATIONAL COUNCIL OF CHURCHES OF CHRIST IN THE U.S.A. is the cooperative agency of 32 national religious denominations with an aggregate membership of over 40 million people in the United States. While their several bodies are sharply divided on the moral significance of abortion, the Governing Board of the National Council unanimously resolved in 1977 that in accordance with its commitment to equal rights for all to reaffirm "its support of the principle that a right guaranteed to all by law must not be denied to any because of economic status;" and urged the President, Congress and state legislatures "to guarantee equal access to legal rights including legal abortions, by ensuring adequate public funding. . ."

The NATIONAL COUNCIL OF JEWISH WOMEN is a volunteer organization dedicated in the spirit of Judaism to advancing human welfare and the democratic way of life. Through a coordinated program of education, service and advocacy and social action, it works in the Jewish and general communities, locally, nationally and internationally. In the belief that it is their responsibility to protect against the erosion of individual liberties guaranteed by the Constitution, it has resolved "to work to protect every woman's right to choose abortion as an individual right and to work to eliminate any obstacles that limit her reproductive freedom."

The NATIONAL EMPLOYMENT LAW PROJECT STAFF ASSOCIATION is a staff union of attorneys, legislative advocates, paralegals and secretaries in New York City and Washington, D.C., which acts as the collective bargaining agent for people who have dedicated their skills to representing poor people in their employment problems. It believes that Medicaid-eligible women will not be able to exercise their employment rights if they cannot exercise their fundamental right to choose.

The NATIONAL FAMILY PLANNING AND REPRODUCTIVE HEALTH ASSOCIATION is vitally concerned with the provision of quality services in the area of reproductive health. It believes comprehensive reproductive health services, education, and medically- necessary abortions should be available to all. It views

Nos. 79-1268 and 79-4, 79-5, 79-491

reproductive rights as one of the most fundamental civil rights, and therefore, opposes any erosion of these rights.

The NATIONAL FEDERATION OF TEMPLE SISTERHOODS is an organization of women identified with the Reform Jewish community. It has 580 groups in the United States, located in 475 cities within 46 states, with a membership of approximately 100,000. Serving as advocates in the pursuit of justice and equality for all persons, it believes that the law must make no distinctions on the basis of economic status, gender, or religious, ethnic or political identity and opposes any legislative restrictions which deny equal opportunity for medical assistance or funding for such services that disadvantage the poor.

The NATIONAL GAY TASK FORCE consists of 10,000 persons in 3,000 local organizations. It is involved in civil rights advocacy and public education on behalf of this nation's 22 million gay people.

The NATIONAL LAWYERS GUILD is an organization of 7,000 lawyers, law students and legal workers, dedicated to the goal of full equality for all people. Since its inception it has worked consistently for the advancement of the rights of poor and working people, racial minorities and women. Over the past decade, its work to support the women's movement has become a priority and it is actively involved in protection of reproductive rights for poor, minority and working women. Individual members throughout the nation represent litigants attempting to prevent cutbacks in funded abortions or seeking to end sterilization abuse.

The NATIONAL LEGAL AID AND DEFENDER ASSOCIATION represents 15,000 lawyers and legal workers in 2,600 legal services and public defender programs. It works to provide adequate legal services for the poor in civil and criminal cases, and believes that health care services should be available to all people.

The NATIONAL ORGANIZATION FOR WOMEN is a national membership organization of 115,000 women and men in over 750 chapters throughout the country, which has as one of its priorities the preservation of the right to reproductive freedom, including abortion. It believes that every woman has a fundamental constitutional right to choose to terminate her pregnancy by abortion and that the Hyde Amendment deliberately and purposefully denies poor women reproductive freedom, jeopardizing not only their health but their lives, families, employment and education.

The NATIONAL ORGANIZATION FOR WOMEN LEGAL DEFENSE AND EDUCATION FUND is a non-profit, civil rights organization established to perform a broad range of legal and educational services in support of women's efforts to eliminate sex-based discrimination and secure full and equal rights for all women.

The NATIONAL ORGANIZATION OF LEGAL SERVICES WORKERS (NOLSW) is the union representing the lawyers and legal workers who provide civil representation to the poor. Among its clients are destitute women who are denied the right to choose whether to bear a child merely because Medicaid arbitrarily will not pay for an abortion while funding is available for prenatal care and the costs of birth. NOLSW has dedicated itself to eliminating all forms of injustice to the poor. NOLSW stands opposed to any infringement upon the basic rights of people merely because of their poverty. It believes that the right to choose is of such personal consequence that it is not to be intruded upon by the government.

Nos. 79-1268 and 79-4, 79-5, 79-491

The NATIONAL PUERTO RICAN FORUM is an organization dedicated to the socio-economic improvement of mainland Puerto Ricans through job training and placement, counseling, English language and high school equivalency instruction and advocacy. It maintains 15 offices nationwide, and the largest percentage of its constituency are the economically disadvantaged. It considers this decision to be grossly discriminatory and unconstitutional.

The NATIONAL URBAN LEAGE, INC. is a charitable organization, organized as a not-for-profit corporation. As the oldest nonpartisan human rights organization in the nation, it has waged a 70-year campaign against poverty, racism, illiteracy and neglect. As a result of its ongoing efforts to ameliorate prevailing conditions in Black ghettos, the League is painfully aware of the unacceptably poor health of many Black Americans. Maternal morbidity and mortality rates among Black women, and particularly among Black teenagers are significantly greater than the national averages. The League believes that the availability of abortions to all Black women who are in medical need of them is critical to its efforts to reduce maternal morbidity and mortality among Black women.

The NATIONAL WOMEN'S CONFERENCE OF THE AMERICAN ETHICAL UNION is an ethical-humanist religious organization which believes in the right of each individual to exercise his or her conscience and that every woman has a civil and human right to determine whether or not to continue her pregnancy.

The NATIONAL WOMEN'S HEALTH NETWORK (NWHN) is a national consumer organization which focuses on women's health. It has 2,200 members, 118 of which are organizations, including health care centers, consumer groups, women's health organizations and health education projects. Twenty percent of its individual members are physicians and nurses. It represents groups as diverse as the American Foundation for Maternal and Child Health and the American College of Nurses and Midwives.

The NATIONAL WOMEN'S POLITICAL CAUCUS is a multi-partisan organization dedicated to the education and full participation of women in all aspects of the political process. It has 45,000 members nationwide in 300 state and local caucuses and is committed to assuring reproductive freedom and adequate health care for all women. It believes that the instant decision severely impacts on poor women, depriving them of equal protection under the law.

The NATIONAL WOMEN'S STUDIES ASSOCIATION is a national group of 2,000 members involved in public and private education at all levels, committed to developing and promoting women's studies and feminist education in all areas. It is concerned that women, regardless of their financial status, receive the services necessary to control their lives and allow them to educate themselves. It also believes that the right to reproductive control, including funding for abortion, are constitutionally guaranteed provisions.

The NEW JERSEY ASSOCIATION OF BLACK EDUCATORS acts to promote and protect the welfare and education of Black people throughout the state of New Jersey. It is concerned that health services be provided for the poor as well as the rich in accordance with constitutional principles.

The NEW YORK COALITION CONCERNED WITH ADOLESCENTS AND THEIR FAMILIES provides services for pregnant and parenting adolescents. It is concerned with the impact that withdrawal of funding for abortions will have on the large

Nos. 79-1268 and 79-4, 79-5, 79-491

percentage of its clients who are receiving public assistance.

The NEW YORK MOBILIZATION FOR SURVIVAL is part of a nationwide coalition of 200 peace, anti-nuclear, feminist and other community groups involved in social change. Meeting human needs is one of its goals and the fact that billions of dollars are spent on weapons while funds are cut for Medicaid abortions is of great concern.

NEW YORK WOMEN FOR CRIMINAL JUSTICE, INC., is an organization of women at all levels of the criminal justice system -- police and parole officers, judges, social workers and ex-offenders. Its purpose is to provide a network for the exchange of information about programs, jobs, and ways of assisting each other within the system. It has seen the harm done to women by domestic violence, unwanted children, the inability to support and nurture even wanted children, and the harm done to society when children grow up in hostile environments. The consequences of depriving women of the right to an abortion paid for by Medicaid locks them into inextricable situations and will be felt, in terms of increased violence, broken homes and crime, by all of society.

The NORMANS EQUITY ACTION LEAGUE, HOUSTON CHAPTER, is a broad-based organization whose purpose is the achievement of equitable treatment for women in education, business, banking law and credit. It believes that women need a legitimate alternative to unwanted pregnancies in order to fully participate economically in all aspects of our society.

NORTHWEST WOMEN'S HISTORY PROJECT is a non-profit corporation dedicated to advancing women's history because history teaches that women's control over reproductive capacity is directly linked to women's social and economic equality. The Project therefore opposes denying reproductive control to poor women as they already bear the heaviest burden of women's second class status.

NOVA HEALTH SYSTEMS, DBA REPRODUCTIVE SERVICES operates eight non-profit clinics throughout Texas, which serve 25,000 women annually with abortions and sterilizations. Prior to the Hyde Amendment, 4.9 percent of their patients were Medicaid-eligible; subsequent to the cutoff of funding, only 2.2 percent were Medicaid-eligible women. As a result, women are being forced to carry unwanted pregnancies to term or to have illegal, unsafe abortions.

The OMNI HEALTH CENTER is a non-profit organization providing reproductive health services for women and men which is opposed to the forced labor and delivery which the recent decision on the Hyde Amendment has mandated for thousands of women with unwanted pregnancies. It is particularly concerned about teenage girls who lack the finances for a legal abortion but may also lack the financial and emotional resources necessary to raise a child.

OPTIONS FOR WOMEN OVER FORTY is a membership organization serving the needs of a wide range of mid-life women in the San Francisco Bay area. It is committed to creating a legal process which allows for funded abortions and is appalled at the denial of Medicaid funds since the resultant effect upon all poor women and their families will be disastrous.

The OREGON FEDERATION OF NURSES, LOCAL 5017, believes that denying poor women the financial means to secure a medically safe abortion constitutes a severe threat to their health and their lives, and that women must not be forced to bear unwanted children or attempt a self-induced abortion simply because of

their poverty.

OREGON LEGAL SERVICES is a federally funded poverty law program. It believes that excluding medically necessary abortions from Medicaid coverage will seriously undermine the health and welfare of millions of poor women who are its clients and drastically set back the hard won gains in the struggle for full emancipation for women.

The OREGON WOMEN'S LAW CAUCUS is a state-wide organization of women lawyers concerned with the rights of women. It is adamantly opposed to the result in the instant case and considers it to be an unconstitutional and unjust denial of the rights of poor women.

The ORGANIZATION OF WOMEN FOR LEGAL AWARENESS is a national organization comprised of 7,000 members, primarily female single heads of households who bear the burden of all the inequities resulting from the varied imbalances inflicted upon women. It recognizes the need for free and low-cost medical assistance, and it is committed to the existence of a statutory structure which allows its client community to be eligible for funded abortions.

The PARK SLOPE SAFE HOMES PROJECT is a community based program for battered women and their families, serving a racially and economically diverse neighborhood in Brooklyn. A substantial percentage of the residents are Medicaid eligible. The Project helps women put an end to violence in their homes but, after leaving their husbands, some women find that being financially responsible for their children forces them into poverty. The fact that poor women cannot have equal access to abortions is unjust and sometimes life-threatening and the Project supports Medicaid reimbursement for abortions.

The PEOPLE'S ALLIANCE has been active for several years in the national struggle to defend the right of all women to choose whether or not to have children. Two years ago, it initiated a petition to defeat the Hyde Amendment and collected over 15,000 signatures. Its commitment today remains as strong, if not more so.

The PHYSICIANS FORUM is an organization of doctors throughout the country working to promote health for all people. It is the oldest and only nationwide membership organization of physicians with a public interest perspective on the full range of health issues current in our society. It has had a long concern for reproductive health rights, particularly the ready availability to low-income women of all methods of family planning and termination of pregnancy, and believes that economic barriers to such services seriously lowers the quality of care its members can provide to patients in both private and institutional practices.

The PITTSBURGH FREE CLINIC INC. provides various medical counseling and referral service to person who range in age from 13 to 35 and who find it very difficult to use existing health care facilities. It is a non-abortion health care clinic which has always believed in an individual's right to receive an optimal range of health care including the right of every woman, regardless of her economic status, to receive comprehensive pregnancy counseling and, if she so decides, the right to a clinically safe abortion.

The PORTLAND MENTAL HEALTH PROJECT is a non-profit corporation which believes that depriving poor women of the means to control the size of their families

Nos. 79-1268 and 79-4, 79-5, 79-491

seriously undermines the stability of the home and frequently has catastrophic effects on the mental health of both parents and children. It sees the recent decision as adding to the already severe psychological burdens of poverty by forcing women to bear children when they lack the emotional and financial means to care for them.

The PORTLAND STATE UNIVERSITY WOMEN'S STUDIES CERTIFICATE PROGRAM is a department within Portland State University with approximately 1,000 enrolled students per quarter. It firmly believes that the right to an abortion for all women, including women who depend on Medicaid for medically necessary services is a fundamental precondition to equality between men and women.

The PORTLAND WOMEN'S HEALTH CENTER is a non-profit corporation providing quality health care screenings for women including gynecological and abortion services. It believes that the instant decision drastically affects a woman's right to abortion and that illegal abortion or forced motherhood will become the only reality for low income women.

The PORTLAND WOMEN'S RESOURCE CENTER is a non-profit corporation which serves all women and is supported by local funding and volunteers. As a center for thousands of women yearly, it sees the instant decision as a severe blow to women who are struggling to emerge from dependence and attempting to gain control over their own destinies.

The PORTLAND YWCA WOMEN'S RESOURCE CENTER is a department within the YWCA and an organization with a membership of 13,000. It supports every woman's right to adequate health care regardless of economic status.

The PREGNANCY CONSULTATION CENTER is a non-profit reproductive health center with four clinics providing thousands of women in Northern California with family planning and abortion services each year. It is committed to the provision of abortion services to all women regardless of their economic resources and feels that the withdrawal of federal funds for abortion will contribute to the ill health of poor women and families throughout the nation. It adorns the creation of a two-class health care system which would provide abortions only to those who have access to personal economic resources.

PRETERM CLEVELAND is a non-profit, tax-exempt abortion clinic focusing on humanized and individualized health care for women. Sixty-nine women on welfare sought abortions there between July 1 and July 15. When the Hyde Amendment was implemented in August 1977, Preterm was never paid for welfare clients treated during the post-ruling period while it was waiting for notification. For that reason, beginning July 1, 1980, it required a fee of \$ 125 from ADC women. Its usual fee is \$ 190, but it is committed to helping any woman who want an abortion but cannot afford it. Preterm does not have statistics on how many women did not make an appointment after discovering that welfare women would need to have part of the fee.

The PRO CHOICE COALITION is a group of men and women from all professional and ethnic groups in Anchorage committed to ensuring safe, legal abortion. It feels that lack of funding for abortions is discriminatory particularly since the cost of abortions in Alaska is extremely high. Many women are dependent on federal assistance and without funding will have no alternative but an illegal operation.

Nos. 79-1268 and 79-4, 79-5, 79-491

The PROJECT RETURN FOUNDATION, INC. provides a variety of services to the unserved, underserved and disadvantaged people of New York including a residential rehabilitation substance abuse program, a foster care program for abused, neglected and delinquent adolescents, an escort service for senior citizens, and a food bank which distributes surplus food to 275 non-profit organizations in New York City who feed over 70,000 people in their programs. The majority of its clients are minority group members from low income or welfare backgrounds and are those who will be most affected by the lack of funds for abortion.

The PUERTO RICAN LEGAL DEFENSE AND EDUCATION FUND is a non-profit corporation located in New York City. Its purpose is to defend the interests of Puerto Rican and other Hispanics in the U.S. by providing representation on issues of concern to that community. Statistics indicate that the Puerto Rican community may be the poorest minority in the country. It is concerned that the inability of Puerto Rican women to choose to obtain medically necessary abortions will have an adverse impact on their health and their ability to obtain and retain employment and raise their children.

PLANNED PARENTHOOD FEDERATION OF AMERICA, INC. is a not-for-profit corporation with its headquarters in New York City. It is the leading national voluntary public health organization in the field of family planning and also functions as a clearing house for information and services. It has 187 affiliates in 43 states and the District of Columbia which operate approximately 744 family planning clinics offering services to the public. Most affiliates offer medical services, including 36 which offer abortion as part of their program. It is committed to the principle that safe abortions should be available to all who need them. It does not view abortion as an alternative to contraception but rather as essential to protect women when contraception has not been available, has not been used for some other reason or has failed. It believes, moreover, that for women who need but cannot afford abortions, public funds must be made available to provide this essential service.

The RAPE AND ASSAULT COMMITTEE FOR THE NASHUA AREA, INC. provides services to New Hampshire women who are victims of sexual assault, domestic violence, rape and incest. It feels that women who are victims of violence should be given a choice regarding control of their own bodies, and that abortion should be available to the poor as well as the affluent.

The RELIGIOUS COALITION FOR ABORTION RIGHTS is an organization of national religious bodies with state affiliates throughout the country. It is committed, on the basis of faith and moral conviction and in the light of constitutional guarantees of privacy and religious freedom, to encouraging and coordinating support for safeguarding the legal option of abortion, to ensuring the right of individuals to make decisions concerning abortion in accordance with their consciences and responsible medical practice, and to opposing efforts to deny these rights through constitutional amendment, or federal and state legislation.

RELIGIOUS LEADERS FOR A FREE CHOICE is a New York based group of 60 religious leaders committed to a pro choice perspective on the basis of moral and theological conviction. Its purpose is to mobilize the religious community, through education, to actively safeguard the legal option of abortion for all women. It believes that denying Medicaid funds for abortion is wrong and that the denial not only makes it difficult for poor women to exercise a legal right but also implies public censure of a form of medical service which in fact has

Nos. 79-1268 and 79-4, 79-5, 79-491

the moral support of major religious groups.

The REPRODUCTIVE RIGHTS NATIONAL NETWORK consists of 37 member organizations in 14 states doing organizing and educational work around the issues of reproductive freedom. It believes that the instant decision creates a dual system of health care and justice because the the constitutionally protected right to abortion will cease to be a reality for poor women, and that it jeopardizes the rights of all women as it is only one aspect of the attack on reproductive freedom.

REPRODUCTIVE SERVICES is a non-profit organization in Houston providing reproductive services for men and women which protests the recent decision because it selectively denies the right to abortion by singling out poor women.

The SAN FRANCISCO LAWYERS' COMMITTEE FOR URBAN AFFAIRS, which is the Northern California affiliate of the Lawyers' Committee for Civil Rights Under Law, was organized to bring to bear the skills and knowledge of volunteer attorneys in private practice in a continuing effort to reduce problems of urban poverty and civil and criminal injustice. It has a strong commitment to furthering and safeguarding the legal rights of the poor.

SAN FRANCISCO WOMEN'S CENTERS/WOMEN'S BUILDING is a membership organization of over 800 individual women and progressive organizations including working and professional women, single women, single mothers, older women, women of color, disabled women and lesbians. One of its ongoing commitments is to reproductive and medical assistance to all women regardless of their economic status and the creation of a legal process which allows for funded abortions.

The SAN FRANCISCO WOMEN'S HEALTH CENTER is a community-based, non-profit organization of health care providers and consumers. As part of its services, it operates a referral system for clinics and doctors in San Francisco which includes abortion clinics and private gynecologists who perform abortions and, as a result, it is very aware of the need for continued federal funding for abortion services as part of health care. It believes that no matter what a woman's economic situation she should have access to a safe, free or low-cost abortion and strongly protests the Hyde Amendment's discriminatory result.

The SCHENECTADY COMMUNITY ACTION PROGRAM, INC. is a local, private, non-profit corporation building bridges between the poor community and services agencies designed to meet human needs. It acts as an advocate for the rights of poor people and works to promote the participation of the poor in decision making which affects their lives. It has since 1976 supported the right of poor women to safe, legal abortions.

SOCIAL SERVICE EMPLOYEES UNION, LOCAL 371, affiliated with District Council 37, American Federation of State, County and Municipal Workers, represents over 10,000 caseworkers, social workers and other service personnel working in the Department of Social Services, the Health and Hospitals Corporation and other agencies within New York City which serves the poor. It is committed to quality health care for the poor whom it services daily and believes that the government has a responsibility to provide abortion benefits for the medically indigent.

The SOJOURNER TRUTH CENTER FOR WOMEN is a not-for-profit organization dedicated to serving the women of the Missouri Bootheel by increasing their self-awareness and pride, by providing problem-solving, education and other

resources, and by providing a positive learning environment that will nurture the idea of a community of support. It recognizes the vital need for free and low cost medical assistance and is committed to the existence of a statutory structure which allows its client community to be eligible for funded abortions.

The SOMERVILLE WOMEN'S CENTER is a community-based women's center in Massachusetts which receives approximately 1,000 calls each year from women in their community. They provide services in stress relief, childcare, referral and violence against women.

The SOUTHERN POVERTY LAW CENTER is a public interest law organization working to protect the legal and constitutional rights of poor people and minorities. Its work includes numerous capital punishment cases and civil suits in such areas as occupational disease, child nutrition, voting rights, prison and mental health facility conditions, and employment discrimination. It represented the plaintiffs in the Relf case, which attacked involuntary sterilization, and also litigated issues of child custody and the inheritance rights of illegitimate children.

The SUMMIT MEDICAL CENTER, a surgical outpatient clinic licensed by the Michigan Department of Health, specializes in reproductive health care for women. It believes that the government has a responsibility and legal obligation to provide quality health care for its economically disadvantaged citizens, including funding for abortions.

The SUPPORT CENTER in Omak, Washington, provides services to victims of domestic violence and rape. One third of its clients are Native Americans. Continually confronted with the different treatment afforded women of privilege and "means" by law enforcement and other agencies, it strongly opposes the inequitable treatment of poor women denied access to health care services.

The TALLAHASSEE FEMINIST WOMEN'S CENTER is a private, non-profit, activist agency which provides abortion and other health services to more than 12,000 women in a three-state area. It has paid for abortions which the government has refused to fund since 1977 and no woman is ever denied an abortion for lack of money. It feels that thousands of women will suffer physically, economically and emotionally from this unusually cruel decision.

The ULSTER COUNTY COALITION FOR FREE CHOICE represents approximately 200 people in New York who are committed to protecting every woman's right to choose. It considers reproductive freedom the most fundamental of rights, one which cannot be legislated but must be protected by the government. It believes that cutting off funds punishes and discriminates against poor women.

UNION W.A.G.E. is a non-profit, nonpartisan organization of working women fighting discrimination on the job, in unions and in society and dedicated to achieving equal rights, equal pay and equal opportunity for women workers. It has an interest in fighting all judicial actions which operate to discriminate against poor and working women and recognizes that good health care and control over one's own body is a fundamental human right.

The UNITARIAN UNIVERSALIST SERVICE COMMITTEE and the UNITARIAN UNIVERSALIST ASSOCIATION are dedicated to the supreme worth of every human personality. It is the public policy position of the Unitarian denomination, which has 150,000 members, that every woman has the right to choose an abortion.

Nos. 79-1268 and 79-4, 79-5, 79-491

The UNITED CHURCH BOARD FOR HOMELAND MINISTRIES is made up of 6,400 churches with 1,800,000 members in every state but Alaska and the District of Columbia. Its areas of concern include development and administration of programs in racial and economic justice, health and welfare, Christian education, evangelism, church extension, higher education, publications, church and arts, research, and resources and services for conferences and local churches. It was the first major religious body in the U.S. to support freedom of choice for women facing problem pregnancy and to advocate their right to legal and safe abortion and, in 1977, called on its members to petition the government to assure that the poor will be provided with medical services to exercise their constitutional rights to end or complete pregnancies.

The UNITED ELECTRICAL, RADIO AND MACHINE WORKERS OF AMERICA is a labor organization representing thousands of employees of manufacturers of electrical products, equipment, machinery, appliances, machine tools and allied products throughout the U.S. and Canada. Among them are thousands of women. UE and its many affiliated locals have entered into collective bargaining agreements governing wages, hours, and other conditions of employment, and medical procedures such as abortion are among the negotiated benefits. However, the protection of these contracts are often lost to many employees who lose their jobs because of the long-term layoffs characteristic of the economic recession presently in effect and these employees then become dependent upon Medicaid. The denial of funding for abortion is a matter of great importance to the workers UE represents and to UE itself, whose concern does not end simply because of the workers' termination of employment.

UNITED NEIGHBORHOOD HOUSES OF NEW YORK, INC. is an organization consisting of 36 settlement houses and neighborhood centers serving low-income families and children in predominantly Black and Hispanic communities. Its primary concern is neighborhood improvement and promotion of social welfare and it has, for 80 years, championed the rights of poor people to fair and equitable treatment.

The UNITED PRESBYTERIAN CHURCH in the U.S.A. consists of over 2.5 million people in 8,600 churches. Over the past decade the Assembly of the denomination has repeatedly affirmed its commitment to the right of every woman to make decisions concerning abortion on the basis of her conscience after consultation with medical authority. To deny exercise of this freedom of choice to any woman merely on the basis of her economic status is to deny that freedom and justice for all which our government so loudly proclaims to the rest of the world.

The UNITED WELFARE LEAGUE is based in New York and dedicated to the struggle for a decent quality of life for the poor and feels that the denial of Medicaid funds for abortion threatens the very foundations of poor families and will cause widespread death to poor women. It believes that, stripped of the verbiage, the instant ruling is blatantly racist and creates a double standard of health care.

The UNITARIAN UNIVERSALIST WOMEN'S FEDERATION is the women's organization of the Unitarian Universalist Association. One of its stated purposes, subscribed to by its nearly 10,000 members, is to join wholeheartedly with men and women everywhere in striving for universal human dignity, equality, freedom and peace. It believes that every woman should have freedom of choice consistent with sound medical practice and in accordance with her conscience and religious beliefs, and that to withhold public benefits from one segment of the population is to coerce them to forego a fundamental personal freedom.

Nos. 79-1268 and 79-4, 79-5, 79-491

The UNITED SYNAGOGUE OF AMERICA is a congregational association of conservative Judaism. It has 830 affiliated congregations in the U. S. and Canada whose combined membership is over 225,000 families, 1.5 million men, women and children. Its objective is to foster religious life in the synagogue and in the home as expressed in traditional observances and loyalty to the Torah and its historical exposition. It has adopted a position opposing all attempts to deprive women of Medicaid funds for abortion because it believes that, while abortion involves very serious psychological, religious and moral problems, the welfare of the mother must always take precedence over that of the fetus up to the minute of birth; a threat to a mother's health is equated with a threat to her life. It further believes that this principle must be applied to rich and poor women alike.

The UNION OF AMERICAN HERBREW CONGREGATIONS strongly supports the right of a woman to obtain a legal abortion on the constitutional grounds enunciated by this Court in its 1973 decision. While recognizing the right of religious groups whose beliefs differ, it opposes the attempts to legislate the particular beliefs into laws which govern us all. The restrictions aimed at halting Medicaid funding severely discriminate against and penalize the poor who rely on governmental assistance to obtain the medical care to which they are legally entitled, including abortion.

The WAR RESISTERS LEAGUE is a national organization with 10,000 members that believes that war is a crime against humanity and is determined not to support any kind of war, international or civil, and to strive nonviolently for the removal of all causes of war. It relates the struggle against war to the struggle for a free and just society and stresses the importance of individual decision and personal responsibility.

WASHINGTON SQUARE LEGAL SERVICES, INC. is composed of 13 lawyers and 100 law students who serve women, the poor, adolescents, prisoners and criminal defendants through legal services and a clinical program at New York University Law School. It represents hundreds of poor women in the communities, jails and prisons of New York and believes that the availability of funded abortions is vital to their health and to the health of their families.

WAYNE COUNTY NEIGHBORHOOD LEGAL SERVICES is composed of seven legal aid offices serving the poor of Michigan. Its client population is severely affected by the cutoff of federal funds for abortion and, while the state has not yet voted to stop state funds, the instant decision has caused renewed effort in the legislature to do so.

The WELFARE ACTION COALITION works to improve the lives of poor people in New York City by organizing community support to demand union jobs, increases in welfare grants, decent housing and quality health care for all poor people.

The WELFARE RECIPIENTS LEAGUE, INC. consists of approximately 2,000-3,000 members in San Jose, California, and is actively involved in protecting the rights of the poor by providing legal assistance and education to 33,000 people each year.

The WESTCHESTER COALITION FOR LEGAL ABORTION is comprised of organizations which do education and political action in support of all women's right to choose abortion. It reaches 8,000 families in New York who participate in grassroots prochoice activities.

Nos. 79-1268 and 79-4, 79-5, 79-491

The WESTCHESTER PEOPLE'S ACTION COALITION, INC. is composed of over 1,000 people and organizations primarily in New York who are united in their support for the human and equal rights of all people, especially those who are oppressed by reason of race, sex or economic status. It sees the elimination of government funding for abortion as combining all three of these forms of oppression and focusing further racist and sexist prejudices on those least able to resist, i.e., economically disadvantaged women. It believes in equal access to all medical procedures for all people and opposes restrictions on abortion and other increasingly repressive and threatening encroachments on human liberties.

The WESTERN NEW YORK COALITION FOR FREEDOM OF CHOICE is a coalition of groups and individuals working around legislation and lobbying. It believes that the right of abortion must be guaranteed to all women regardless of their race or ability to pay.

WESTSIDE MOTHERS is a welfare rights group with 1,100 members in Detroit and its suburbs who receive public assistance. It is dedicated to helping create a humane welfare system, one aspect of which is fair and equitable medical coverage, including abortion.

The WESTSIDE WOMEN'S CLINIC is located in Santa Monica, California, and provides family planning, gynecology and abortion services. It is particularly concerned with the lack of funding because one of its primary services is first trimester abortions. Many of its clients are Spanish-speaking and many rely on Medi-Cal for payment.

WOMEN AGAINST ABUSE is a shelter and legal advocacy/services program for battered women in Philadelphia. It is concerned about the denial of the right to abortion for poor women because it sees the everyday effects on the women it serves of the lack of options in other areas, i.e., housing, jobs, day care, and so forth. To women who have already been traumatized by repeated, brutal beatings in their own homes, an unplanned pregnancy is an additional trauma at a time when personal resources and reserves have already been exhausted. To force her to give birth at such a time is cruel to her, to her children and to the unborn child.

WOMEN AGAINST PORNOGRAPHY is a feminist organization which speaks out, through education and private actions, against pornography because it exploits sexual inequality and violence against women. WAP deplores the Court's decision in the instant case. Like rape, battery, and sexual harassment, denying poor women safe abortions deprives all women of physical and psychological autonomy; it is an act of violence against all women.

WOMEN AGAINST VIOLENCE AND PORNOGRAPHY IN MEDIA is a nationwide organization of 1,300 women and men concerned about pornography and committed to educating about the link between media violence against women and real-life violence against women in order to put an end to such violence. It believes that the right of all women to control over their bodies is part of the struggle to end violence against women.

The WOMEN AND CHILDREN'S RIGHTS COALITION CITIZENS GROUP has 750 members throughout the State of Oregon. As a group dedicated to preserving the rights of women and children, it strongly opposes the attempts of the legislatures and courts to determine the reproductive rights of women on the basis of their

financial status and believes in every child's right to be wanted and every woman's right to decide when she will bear a child.

WOMEN FOR WOMEN OF CINCINNATI, INC. is a medical facility for women dedicated to the woman with a problem pregnancy. It recognizes that all women have a right to reproductive freedom, not just those able to afford it.

WOMEN-IN-CRISIS/COUNSELING AND ASSISTANCE is a private, non-profit corporation with a membership of 250 people in Fairbanks, Alaska. Its goal is to end institutionalized dominance of women and it believes that, as the result of discriminatory funding, poor women are being denied the ability to exercise the fundamental right to reproductive self-determination and subsequent control of their lives.

The WOMEN IN HEALTH ROUNDTABLE is an association of health professionals and women's organizations based in the District of Columbia. It opposes the denial of Medicaid funds for abortion and asserts the right of all women to have access to safe, legal abortion services.

WOMEN IN POLITICS has 250 members throughout California, most of whom work in the state government. They focus on issues relating to women through political action and legislative reform.

WOMEN IN SELF HELP is a displaced homemaker center in Brooklyn offering a job readiness program for those individuals who are widowed, divorced or separated, between the ages of 36-62, and have lost their source of income. Approximately half receive public assistance. It supports the basic freedom of all women to reproductive control, including legal, safe and competent health care. It is concerned that its participants may lose even the minimum of social services they presently receive and feels that the Court must be responsible to all segments of our society, not just the privileged few.

The WOMEN LAWYERS' ASSOCIATION OF LOS ANGELES is a countywide bar association affiliated with the Los Angeles County Bar Association. It has as its members male and female lawyers, judges and law students who are concerned with the special problems affecting women in our legal system. These include problems facing women lawyers and women law students and problems facing women in our society which are caused by or can be remedied by the legal process. It believes that the instant case has implications for all the above concerns.

The WOMEN LAWYERS' ASSOCIATION OF MICHIGAN has 500 members and nine regional organizations throughout the state made up of female and male attorneys, judges and law students. Its purpose is to secure the rights of women in society and advance the interests of women members in their profession. It has consistently supported freedom of choice for all women, including poor women, and has supported state and federal funding of abortions.

WOMEN ORGANIZED AGAINST RAPE in Philadelphia provides supportive services to victims of rape and incest, many of whom are dependent on medical assistance. Their concern is that indigent women who are traumatized as a result of rape or incest and become pregnant have the unencumbered option to choose abortion. The exclusion for victims of rape and incest who promptly report to authorities is meaningless because most do not or cannot report the crime; furthermore, incest is frequently repeated over long periods of time and the victims are often very young.

Nos. 79-1268 and 79-4, 79-5, 79-491

WOMEN ORGANIZING FOR REPRODUCTIVE CHOICE is a group of women working in the Los Angeles area to reach women lacking information and access to abortion services. It believes that the ability to terminate a pregnancy is vital to women's health and welfare, that women of low income must be able to exercise that right if they so choose, and that they cannot exercise it unless funds are made available to them.

The WOMEN'S ACTION ALLIANCE, a national center on women's issues and programs, is firmly committed to equality for all people regardless of sex. It offers a national information and referral service, provides technical assistance to women's organizations and serves as a vehicle for building coalitions among local and national women's groups. It consists of 33 national organizations which include thousands of individual women.

WOMEN'S ADVOCATES in St. Paul, Minnesota, is a non-profit agency providing shelter, protection, counseling and advocacy to battered women and their children, most of whom are on welfare or will need it upon leaving their husbands. It has been found that many assaults occur for the first time during pregnancy, and that abusive partners often do not allow the use of any contraceptive. Women are often forced into sexual intercourse during or after episodes of violence. Forcing women into unwanted pregnancies by denying abortions is another form of abuse -- a means by which women's rights and bodies are violated by males who do not have to be responsible for the consequences.

The WOMEN'S BAR ASSOCIATION OF MASSACHUSETTS is a statewide organization of attorneys with a membership of 300. Its purpose is to promote and enhance the interests of women attorneys and the interests of all women. The organization has resolved that it opposes all laws restricting or burdening the access of women to safe and legal abortion and in particular opposes all laws restricting access of low-income women to safe, legal abortion.

The WOMEN'S CAUCUS FOR ART, HOUSTON CHAPTER, is a group of artists and patrons of the arts who support women's constitutional right to reproductive freedom. It considers restrictions on federal funding for medically necessary abortion an infringement on women's constitutional right and invidious discrimination against low-income women.

The WOMEN'S CENTER serves a population of poor women, displaced homemakers and welfare recipients in a mountainous, rural area of California. They provide counseling, job training, protection from sexual assault, help with access to medical care and maintain a rape crisis center. Medical care is inaccessible to the women in their community because doctors will not accept Medicaid, forcing the women to travel great distances to obtain needed medical attention.

The WOMEN'S CENTER OF MID-MINNESOTA provides shelter for battered women and their children. The women they service are poor, welfare mothers of varying racial and ethnic groups.

The WOMEN'S COALITION is a forum for the women's community at Wesleyan University. It is concerned with attaining full civil rights for all women, regardless of race, age, or economic status. It believes that the 1973 Court decision guaranteed women the right to choose to have an abortion and that the Hyde Amendment infringes upon that right by discriminating against poor women.

Nos. 79-1268 and 79-4, 79-5, 79-491

The WOMEN'S COMMISSION IN EXILE is a statewide independent organization seeking solutions to the economic injustices confronting women in Massachusetts.

The WOMEN'S CRISIS SERVICE offers a 24-hour shelter home for women and their children as well as a 24-hour hot line for women in crisis situations. Located in Salem, Oregon, it is a non-profit agency committed to working for the improvement of women by providing them with the necessary resources and options to take control over their own lives, and sees the availability of federally funded abortions to poor women as essential and vital to the emotional and physical well being of its clients.

The WOMEN'S EQUITY ACTION LEAGUE EDUCATIONAL AND LEGAL DEFENSE FUND is a non-profit, tax-exempt association organized to provide legal assistance and services to ensure the full participation and recognition of individuals in all facets of national life without discrimination based on sex. In order to secure legal and economic rights for women, it conducts educational and research projects in the area of sex discrimination, monitors the implementation and enforcement of civil rights and other laws, and supports and initiates lawsuits in the field of equal rights.

The WOMEN'S HEALTH CONCERNS COMMITTEE is an advocate for women's health needs and works to make woman-centered health information available to Philadelphia women. It believes that the denial of Medicaid funding is an alarming decision that constitutes a violation of a woman's rights, promotes blatant economic discrimination, and subsequently contributes to an atmosphere of racism. It views abortion as a symbolic arena where many non-progressive attitudes about the quality of women's lives and human rights in general are played out and that this makes it all the more imperative that the instant decision be reversed.

WOMEN'S HEALTH SERVICES, INC. in Connecticut is a non-profit corporation formed by women to provide high-quality, low-cost medical care. A first trimester abortion service is an integral part of its services. Approximately 14% of its patients are women who are eligible for Medicaid. These women may be unable to obtain medically necessary abortions if the decision stands. The clinic is also the plaintiff in a lawsuit seeking a permanent injunction against the state to reimburse Medicaid-eligible women for the cost of medically necessary abortions. An appeal from the judgement granting the injunction is now pending and may become moot by the action of this Court.

WOMEN'S HEALTH SERVICES, INC. in Pittsburgh is a non-profit first trimester abortion clinic which also provides gynecological, contraceptive and counseling services.

WOMEN'S HEALTH SERVICES is a feminist health collective in Santa Fe, New Mexico, which provides medical, counseling and educational services to women by women. It serves 5,000 people each year, 60% of whom are poor.

The WOMEN'S INTERNATIONAL LEAGUE FOR PEACE AND FREEDOM has approximately 10,000 members nationwide. It has worked to eliminate discrimination and oppression based on sex, race and economic conditions, and believes that these principles are at issue in the present case.

The WOMEN'S LAW CENTER is an organization of 50 women lawyers, law students and paralegals in Baltimore which educates women to their legal rights and assists them in asserting those rights. It is concerned about the erosion of

Nos. 79-1268 and 79-4, 79-5, 79-491

the rights of poor women and the consequent erosion of the constitutionally mandated right of all women to control over their bodies.

The WOMEN'S LAW FUND, INC. is a non-profit corporation organized for the purpose of bringing women into full participation in life by securing them their full legal rights. Areas of focus have been government benefits, education, employment, housing and credit. It has been active nationally in the funding of litigation which seeks to guarantee equal government benefits to all regardless of gender or class and is concerned because of the impact which the instant decision has on housing availability, employment opportunity and access to education and credit.

The WOMEN'S LAW PROJECT is a non-profit public interest law firm in Philadelphia dedicated to eradicating sex discrimination under the law and within social institutions. It receives hundreds of calls annually from poor women of all racial and ethnic groups seeking information and assistance about whether to choose an abortion. The cut-off of Medicaid funding for abortion, except in the very limited cases contained in the Hyde Amendment, will mean that many of these women will be denied their right to freely choose an abortion, and will be denied access to medically necessary procedures.

The WOMEN'S LEAGUE FOR CONSERVATIVE JUDAISM is a Jewish religious women's organization focusing on education with 800 affiliated Sisterhoods and 200,000 members in the U.S., Puerto Rico, Canada, Mexico and Israel. It believes that freedom of choice is inherent in the civil rights of women and that the welfare of the mother must always be of primary concern.

The WOMEN'S RESOURCE AND SURVIVAL CENTER in Monmouth County, New Jersey, is a non-profit agency providing counseling and advocacy services for women as well as community education and shelter for battered women. Many of the 500 women it serves each year are welfare and Medicaid recipients. Often, abortion is crucial to the well-being of its clients, particularly to single parents who have few resources to raise a child, and for whom bearing and then relinquishing a child is emotionally unbearable.

The WOMEN'S RESOURCE CENTER in Glendale, California, provides support, guidance and information for women in transition and in crisis. It has served over 7,000 women of every socioeconomic, ethnic and educational level and is a place for women to discover their potential, explore life and career goals, and learn more about themselves.

The WOMEN'S RESOURCE CENTER in St. Louis, Missouri, is a college-based feminist organization providing information and referral services and promoting interest in women's issues, women's studies and culture on campus. Firmly believing that women's control over their own reproduction is a fundamental right, it is committed to informing and supporting women who choose abortion and to keeping safe and legal abortion for all women regardless of income.

The WOMEN'S RIGHTS ACTION GROUP is a membership organization in St. Louis committed to working to ensure that women have the resources and support services necessary to live the way they choose. It believes that it is the right of every woman to make her own personal decision whether or not she wishes to have an abortion and that no woman should be either encouraged or discouraged from choosing abortion. the denial of Medicaid benefits is, it believes, a denial of the constitutional right to abortion enjoyed by women who are not

Nos. 79-1268 and 79-4, 79-5, 79-491

dependent on federal assistance.

WOMENSPACE is a coalition in Cleveland of 63 women's groups with 800 individual members formed to create unity within the diversity of the women's community and to help women gain control of their lives through direct services, educational programming and advocacy. It believes that the 1973 Supreme Court decision is the law of the land and should apply equally to poor and rich women.

The WOMEN'S STUDIES COLLEGE OF SUNY BUFFALO is an educational unit specializing women's studies. Students were participants in fighting to maintain coverage for abortion in student health insurance and believe that abortion should be available to all women regardless of their ability to pay.

WOMEN USA, INC. is an information, communications and action network that reaches women's rights supporters throughout the country. It maintains a legislative office in Washington that monitors, educates and lobbies on issues affecting women and also operates a toll-free hot line that informs women of their rights, including their reproductive rights. Its program includes a stand on abortion rights that also advocates Medicaid coverage of abortions for poor women.

The WOMEN'S WORK PROJECT in Newburyport, Massachusetts, was organized to increase the options women have in choosing work and to increase their control over the product and process of their work. It has served women throughout the state as well as from New Hampshire who are single heads of households and re-entering the job market. As it works to increase the choices and control its clients have over their lives, it recognizes daily that that control must also extend to their reproductive choices and feels that to deny low-income women the choice of a safe abortion is to deny them the right to make decisions which every responsible adult must make themselves.

WORKERS WORLD PARTY is a national political organization with chapters across the country. Its constituency includes both working women and poor women, students and welfare mothers who are Black, Latin, Asian, native and white. They act to combat unemployment, inflation and cutbacks and the many urgent problems facing working and poor people. Recognizing that abortion is a vital part of health care, Workers World Party and its affiliate, Youth Against War and Facism, has long fought to make abortion available to all women, and believes that without Medicaid funding the right to terminate a pregnancy is meaningless to thousands of women who cannot afford to exercise that right.

WORKING WOMEN'S INSTITUTE is a national resource/research/action center concerned with the problems of all women who work outside their homes. It is concerned that Medicaid recipients, and all other women, be guaranteed the right to choose medically safe abortions in their family planning decision.

The YOUNG WOMEN'S CHRISTIAN ASSOCIATION OF THE U.S.A. - NATIONAL BOARD, is the elected body of the YWCA responsible for carrying forward the Association's work. It has 450 affiliated member YWCA's in communities and on college campuses in 49 states serving more than 2 million women and girls of all ages and ethnic groups, and more than 100,000 women volunteers. It has worked steadily to solve critical problems in the lives of women and girls, combining service to meet needs with action to correct societal conditions.

The following YWCA local organizations join as amici to express their support and involvement in women's right to control their own bodies: The YWCA OF GREATER PITTSBURGH, The YWCA OF NEW YORK CITY; The YWCA OF PONTIAC-NORTH OAKLAND; The YWCA OF SYRACUS.

The YWCA BATTERED WOMEN'S PROGRAM, in Spokane, Washington, provides counseling, advocacy, support and shelter. Consistent with the national program priorities of the YWCA, the Alternatives for Domestic Violence Program supports the preservation of the legal option of abortion. It has found that many battered women are pregnant, and if they leave their husbands, are without funds. Therefore, to battered women the alternative of federally-financed abortion is crucial.

The YWCA WOMEN'S CRISIS SERVICE OF MANCHESTER, located in New Hampshire, deals with 100 calls per month from women who need free and low-cost medical assistance. They are dedicated to giving women the choice about whether to bear further children.

The YWCA WOMEN'S TRADE CENTER in Bellingham, Washington, counsels and refers low-income women for jobs, training or apprenticeships in the non-traditional crafts and trades. Its client group is below the federally-mandated level and many are full-time working heads of households who need access to legal medical procedures as much or more than women who are financially better off. It believes that when these women need or desire abortions, they should be able to obtain them exactly like any other recognized medical procedure.

YOUTH PRIDE, INC. is a multi-facet job training program providing training in areas of interest which lead to employment for young people, which has trained and/or provided services to 25,000 teenagers in the Washington, D.C. area. Its present target age group is from 17 to 21 years of age, and it recognizes the need for the existence of a statutory structure which allows its client community to be able to be eligible for funded abortions.

ZERO POPULATION GROWTH, INC. is an organization with 30 chapters in 20 states which has long been an advocate of the availability of safe, legal abortion and family planning services for all women. It sees the Court's instant decision as a form of population policymaking via court action.