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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO  
SOUTHERN DIVISION**

IDAHO FEDERATION OF TEACHERS et al.,

*Plaintiffs,*

v.

RAÚL LABRADOR, in his official capacity as  
Attorney General of the State of Idaho, et al.,

*Defendants.*

Case No. 1:23-CV-353

**DECLARATION OF SCARLET  
KIM IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION**

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**DECLARATION OF SCARLET KIM IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Scarlet Kim, hereby declare as follows:

1. I am a Senior Staff Attorney with the American Civil Liberties Union Foundation and counsel for Plaintiffs in the above-captioned action. I submit this declaration in support of Plaintiffs' Motion for Preliminary Injunction.

2. Attached as Exhibit 1 is a true and correct copy of a memorandum from the University of Idaho General Counsel to University of Idaho Employees, with the subject line "Guidance on Abortion Laws," dated September 23, 2022.

3. Attached as Exhibit 2 is a true and correct copy of an e-mail from Scott Green, President of the University of Idaho, and Torrey Lawrence, Provost and Executive Vice President of the University of Idaho, to University of Idaho Students and Employees, with the subject line "Clarifying Points About State Abortion Law," dated October 5, 2022.

4. Attached as Exhibit 3 is a true and correct copy of a document issued by the University of Idaho with the title "Frequently Asked Questions—Guidance for University Employees and Community Regarding State Laws on Abortion and Contraceptives."

5. Attached as Exhibit 4 is a true and correct copy of a document issued by Boise State University with the title "Frequently Asked Questions: No Public Funds for Abortion Act and Idaho Abortion Laws."

6. Attached as Exhibit 5 is a true and correct copy of a letter from the ACLU of Idaho and Seth Kreimer to the Ada County Prosecutor's Office, dated November 17, 2022.

7. Attached as Exhibit 6 is a true and correct copy of a letter from the ACLU of Idaho and Seth Kreimer to the Bannock County Prosecutor's Office, dated November 17, 2022.

8. Attached as Exhibit 7 is a true and correct copy of a letter from the ACLU of Idaho and Seth Kreimer to the Latah County Prosecutor's Office, dated November 21, 2022.

9. Attached as Exhibit 8 is a true and correct copy of Idaho House Bill No. 2, introduced in the First Regular Session of the Sixty-Seventh Legislature of the State of Idaho.

10. Attached as Exhibit 9 is a true and correct copy of the meeting minutes of the Idaho House State Affairs Committee, 67th Leg., 1st Reg. Sess. (Idaho Jan. 11, 2023) (Statement of Rep. Bruce Skaug, Member, H. State Affs. Comm.), available at [https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2023/standingcommittees/230111\\_hsta\\_0900AM-Minutes.pdf](https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2023/standingcommittees/230111_hsta_0900AM-Minutes.pdf).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 7, 2023 in New York, New York.

A handwritten signature in black ink, appearing to be 'SK', written over a horizontal line.

Scarlet Kim