

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DIVISION OF MISSOURI
EASTERN DISTRICT**

**MISSOURI, KANSAS, and IDAHO,
Intervenor-Plaintiffs,**

v.

**U.S. FOOD AND DRUG ADMINISTRATION, *et al.*,
Defendants,**

and

**DANCO LABORATORIES, LLC,
Intervenor-Defendant.**

Case No. 4:25-cv-01580-CMS

**DECLARATION OF [REDACTED]
IN SUPPORT OF
INTERVENOR-PLAINTIFFS'
RESPONSE TO INTERVENOR-DEFENDANT'S MOTION TO DISMISS
AND MEMORANDUM IN SUPPORT THEREOF
AND IN SUPPORT OF INTERVENOR-PLAINTIFFS' AMENDED
COMPLAINT**

My name is [REDACTED]. I live in St. Louis, Missouri and I have personal knowledge of the facts stated herein:

1. On July 1, 2025, I discovered I was pregnant. My boyfriend kept asking me if I was and then I started thinking I might be. He ghosted me. I texted him on his alternate phone that I thought I was pregnant. He got that text and called me right away. He picked up a pregnancy test and brought it to my place. I took the test and it was positive.

2. It was early morning when he got there (3:00a.m.-ish).
3. I had seen abortion pills in his house, previously. It was early on when we were dating. We started dating in December, 2024. When I asked him about them, he indicated they were for his previous girlfriend.
4. My response to him was that was really dangerous and you can't be doing that. He indicated he got the abortion pills in case his prior girlfriend needed an abortion.
5. He had ghosted me on an off, but, after the positive pregnancy results on July 1, he was around more but left, again, after what I thought was a miscarriage on the night of July 1 into July 2.
6. On the night of July 1 through the morning of July 2, I had cramping and bleeding and I thought I had lost the baby.
7. Later in the day on July 2, around 4:16pm, I confronted him about looking up abortion pills because I was aware he had looked them up right away after we found out I was pregnant. At first, he denied it, then he admitted it. I told him to leave my apartment. He left and blocked me, again, right away.
8. On July 4, 2025, I went to my doctor's office for blood work to see about the baby. Later that day, it was confirmed that I was still pregnant.
9. Later that night, I ran into him (the boyfriend) and he ignored me.
10. Early morning July 5, 1:00a.m.-ish, he texted and called. In that text he apologized, again, for looking up abortion. When I saw the text, around 10:51a.m., I knew he met the pills, because he had apologized before via text for looking up abortion pills. I asked him to come over. He came over around 3:00p.m. When he got there, I told

- him the baby was still alive and the color went out of his face. He hadn't asked me anything about the baby or how I was doing.
11. July 7, 2025, I went to the Baptist Medical Center. They gave me the Rhogam shot and I had an ultrasound and it was determined the baby was still alive and the baby's approximate age was 14 weeks. Due date 2/22-24/26.
 12. The relationship was more on than off until the weekend of the 11th. We spent time back and forth from his place and mine, mostly at my place. I had cramps and they were worse at some times than others. At some point, he brought 2 bottles of "pre-natal vitamins" and arthritis cream to me. They "vitamins" had both already been opened. He advised me to put the arthritis cream on my stomach and put a heating pad over it. I knew this would not be safe because I knew you couldn't use the cream and a heating pad, together, because it causes burns. I was surprised he didn't know that because he is a nurse. I told him I couldn't do that. Later, after else that happened, I saw the box said right on it not to use if you are pregnant.
 13. After July 7 and before the 11th, he sat 3 "pre-natal vitamins" on the counter for me. I thought that was weird but I took them. I had been cramping and bleeding and by July 11, it was so severe I thought I might need medical attention. I was concerned I might be losing the baby. He was uncaring while I had agonized in pain and bled. He flipped through videos on his phone and laughed as I rocked back and forth in pain. He went to sleep. He had done that the previous time, as well – watched the videos and slept.

14. This time, there was so much blood, I knew the baby probably couldn't have survived. The pain, the cramping, the clotting, the amount of blood was so much worse. By July 13, he ghosted me, again.
15. During these days (July 7-11), he had me hike on 2 occasions in the heat, even though I was cramping and bleeding the whole time. I was telling him I thought I was going to faint. I felt so bad. It just kept getting worse. He was callous and refused to even acknowledge my physical condition.
16. On July 14, 2025, I let the doctor know that I thought I lost my baby over the weekend. I went in at 10:15a.m. I had an ultrasound and realized the baby's heart was not beating. The doctor prescribed me something to empty the contents of my uterus. I got the prescription and went to my car in the parking garage.
17. When I opened the prescription and put it on my thigh, I knew I had seen that pill, before. It looked like the "vitamins" he had given me and I started connecting the dots of what had happened. I called the doctor but didn't get to talk to the doctor, then. I wanted to know if he could tell if that was already in my system. I left the parking garaged but I was shaking....
18. My boyfriend had blocked, me again.
19. For obvious reasons, he is no longer my boyfriend.
20. As I processed what he had done, I reached out to the Center Against Forced Abortion. This whole ordeal has been one of the worst things that has ever happened to me.
21. How is it possible a man could get these drugs? The pain was so bad and he was laughing!

22. It has been several months of processing what happened to me and my baby, several months of processing the betrayal of my boyfriend and the loss of my child. Several months of processing the conversations and what he said about his former girlfriend.

23. I am sure he got the pills online and has probably done it to other women before me. If something isn't done to protect women from predators like him, he and others will continue to do this to other women.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

3-24-26

Date

