

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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STATE OF NEW YORK, CITY OF NEW YORK, :
STATE OF COLORADO, STATE OF :
CONNECTICUT, STATE OF DELAWARE, :
DISTRICT OF COLUMBIA, STATE OF :
HAWAI'I, STATE OF ILLINOIS, STATE OF :
MARYLAND, COMMONWEALTH OF :
MASSACHUSETTS, STATE OF MICHIGAN, :
STATE OF MINNESOTA, STATE OF NEVADA, :
STATE OF NEW JERSEY, STATE OF NEW :
MEXICO, STATE OF OREGON, :
COMMONWEALTH OF PENNSYLVANIA, :
STATE OF RHODE ISLAND, STATE OF :
VERMONT, COMMONWEALTH OF VIRGINIA, :
STATE OF WISCONSIN, CITY OF CHICAGO, :
and COOK COUNTY, ILLINOIS, :

Plaintiffs, :

v. :

UNITED STATES DEPARTMENT OF HEALTH :
AND HUMAN SERVICES; ALEX M. AZAR II, in :
his official capacity as Secretary of the United States :
Department of Health and Human Services; and :
UNITED STATES OF AMERICA, :

Defendants. :

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Case No. 19 Civ. 4676 (PAE)

**DECLARATION OF REGINA RENEE FROST, M.D.,
IN SUPPORT OF MOTION TO INTERVENE**

1. I, Dr. Regina Renee Frost, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct:

2. I submit this Declaration in support of Proposed Intervenor's Motion to Intervene. I have personal knowledge of the facts set forth herein and if called upon to do so, would testify competently thereto under oath.

3. I graduated from the University of Michigan with a BA in Psychology in 2000. I graduated from Wayne State University School of Medicine in 2004. I was an Obstetrics and Gynecology Resident at St. John Hospital and Medical Center in Detroit, Michigan from 2004 to 2008. During my last year of residency I was the Chief Administrative Resident.

4. From 2008 to 2009 I worked in private practice as an OBGYN at the Medical Resources Group. From 2010 to 2013 I was part-time faculty at St. John Hospital and Medical Center. From 2010 to 2017 I was a solo-practitioner operating Compassionate Women's Healthcare. From 2018 to the present I have worked at St. John ObGyn Associates with the Ascension Medical Group. I served as a Clinical Assistant Professor for Michigan State University in the Department of Osteopathic Surgical Specialties from 2011 to 2017.

5. I am a Christian and have been a member of the Christian Medical Association since 2014.

6. My Christian faith has given me a passion for missions and helping those in need. For example, during medical school, I served on a mobile medical team in Nyahururu, Kenya, attending to the needs of women, children, and the elderly. I pray with my patients when appropriate and offer words of encouragement to lift their spirits.

7. I have helped lead Women Physicians in Christ ("WPC"), a ministry of CMDA, since 2014. The mission of WPC is to build relationships among female physicians so that they

can encourage and support one another in the profession. I lead a Bible study for a local WPC group that I started in 2014.

8. I am committed to treating every patient with dignity and love, without regard to race, religion, sexual orientation, or gender. As a Christian, I have religious objections to providing or participating in certain procedures, including abortion and sex reassignment surgery, which I believe to be contrary to God's will and inconsistent with my best medical judgment for my patients. Any patient who asks about abortion is informed that I do not perform that procedure. If my employer or the government ever directed or pressured me to perform a procedure to which I have a religious objection, I would be compelled to resign or to leave the practice of medicine, because I will not perform any procedure that I believe is morally wrong or not in the best interests of my patient.

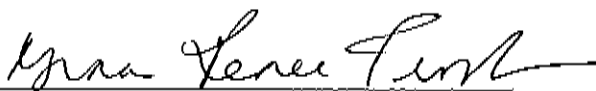
9. I believe that the federal government should protect healthcare providers' conscience rights to ensure that no employer, or state or municipal government, can require healthcare professionals to perform or facilitate procedures to which they have sincere religious objections, or punish healthcare professionals for refusing to perform or facilitate such procedures. I have heard from several physicians who have been terminated or faced significant opposition because of their religious beliefs, and I am concerned that one day I too could be pressured to perform a medical procedure that I find morally objectionable, especially given that my home state of Michigan is a plaintiff in this lawsuit. Without the conscience protections afforded by the regulation challenged in this lawsuit—*Protecting Statutory Conscience Rights in Health Care; Delegations of Authority*, 84 Fed. Reg. 23,170 (May 21, 2019) (“Conscience Rule”)—I would likely be subject to discrimination or termination in such an instance on account of my re-

of my religious beliefs. Invalidating the Conscience Rule would thus harm me and other healthcare professionals with religious objections to certain procedures.

10. I seek to intervene in this action solely in my individual capacity and do not represent the views of my employer.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on this 25 day of June, 2019.



Dr. Regina Renee Frost