

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<p>ILLINOIS RIGHT TO LIFE COMMITTEE,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>J.B. PRITZKER,</p> <p style="text-align: center;">Defendant.</p>	<p style="text-align: center;">No.</p> <p style="text-align: center;">Declaration of Mary Kate Knorr</p>
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Pursuant to 28 U.S.C. § 1746, I declare that the following facts are true, to the best of my knowledge, information, and belief:

1. I am a resident of Will County, Illinois.
2. I am executive director of Illinois Right to Life Committee, headquartered in Chicago, Illinois.
3. Illinois Right to Life is a nonprofit organization that educates on the beauty and value of all human life regardless of a person's size, gender, race, age, or disability. We use a grassroots approach to build a culture of life in Illinois that welcomes and loves all human life from conception through natural death.
4. This spring, because of the ban on group gatherings, we had to cancel two planned panel discussions featuring a national speaker from Colorado who

intended to address the link between abortion, pornography and human trafficking. We had anticipated over 100 attendees at each event.

5. When a new Planned Parenthood clinic opened in Waukegan, we held a socially distanced protest in conjunction with other organizations that was minimally attended because of fear among its activists about the order banning gatherings.
6. IRL hosts a Rise and Dine Benefit Breakfast for Project Love, its charitable effort to support women in crisis pregnancies. Project Love provides grants to women who seek assistance from pregnancy resource centers and find themselves facing financial hardships at the same time as their pregnancy. Project Love makes direct payments to landlords, utilities, and other creditors to help women who otherwise feel financially incapable of carrying their babies to term. A majority of the women who receive Project Love's support come from minority backgrounds. We believe Project Love's work is especially important in this moment, when so many more people than normal are facing deep financial distress. This year we had to cancel the "Rise and Dine Breakfast" because of the Governor's ban on group gatherings, and our small-dollar fundraiser selling Mother's Day greeting cards at area parishes failed for the same reason.
7. Our partners at our affiliate IRL Action plans to hold its annual fundraising event in the fall.

8. We intend to repeat our highly successful Pro-Life Training Tour starting in September; last year the tour held 19 events, most of which drew over 50 people. I also look forward to resuming an active schedule of speaking on college campuses, in churches, and other venues that welcome me to share IRL's pro-life message.
9. We feel especially convicted that our pro-life educational speech is highly timely and must continue as long as the doors to abortion clinics remain open, even in the midst of a pandemic.
10. We believe that Internet-based alternatives are not sufficient to communicate our speech effectively. I know from my years in this movement that abortion is a deeply personal topic, and conversations around it often turn emotional. We believe that in-person, human-to-human interactions are the best way to compassionately share our views.
11. Each spring we hold our annual banquet. This is our major fundraising event for the year, generating approximately one-third of our total annual budget. Hundreds of people have attended in past years, and the event generates a substantial portion of the funds that support our organization. The event is also an important opportunity to draw media attention to our cause, engage our members and supporters, and hear a speech from a major pro-life leader.
12. This year we have already once postponed the 52nd Annual Leaders for Life banquet because of the Governor's ban on group gatherings.

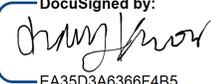
13. Our 52nd Annual Leaders for Life banquet has now been rescheduled to Thursday, July 23. We have booked a nationally known speaker to provide our keynote address. We have reserved a private venue for the event. We have paid deposits to the speaker, the facility, and other necessary vendors for the event.
14. We are developing a detailed and strategic plan for health and safety practices based on guidelines being used for similar public gatherings across the country. This plan requires that attendees wear a face covering when not seated at their table, caps the number of event attendees under a percentage of the venue's capacity, and requires attendees use hand sanitizer when entering the building or leaving the bathroom facilities, in addition to other health and safety standards that have been implemented by the venue directly.
15. The funds raised at the Leaders for Life banquet make possible much of our work: last year many of the dollars raised at the banquet were dedicated to the highly successful Pro-Life Training Tour, which equipped hundreds of our members and supporters with tools and information to spread our pro-life message to friends, neighbors, and especially women making these difficult decisions about whether to terminate a pregnancy. The funds also paid for physical speech collateral, such as pro-life bumperstickers and t-shirts, which often function as conversation starters for IRL's trained activists.

16. However, the banquet is illegal under the Governor's order banning gatherings over 10, and will remain illegal if the State enters phase four under the Governor's plan banning gatherings over 50.

17. Our planned training tour, our scheduled fall fundraiser, and our anticipated advocacy rallies are all also illegal under the Governor's order banning gatherings over 10, and will remain illegal if the State enters phase four under the Governor's plan banning gatherings over 50.

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

Dated: June __, 2020

DocuSigned by:

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Mary Kate Knorr, declarant