

May 1992

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Recommended Citation

Sadick, Mary H. (1992) "Legislating Pro-Life Principle: Victory Without Compromise," *The Linacre Quarterly*: Vol. 59: No. 2, Article 5.

Available at: <http://epublications.marquette.edu/lnq/vol59/iss2/5>

Legislating Pro-Life Principle: Victory Without Compromise

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A Panel Presentation to the 60th Annual Meeting of the National Federation of Catholic Physicians' Guilds at Ann Arbor, Michigan, October 12, 1991.

For those of you not familiar with A.L.L., American Life League and American Life Lobby were founded in the late 1970's by Judie Brown, her husband, Paul, and several other families. From that modest start, the organizations have grown to over 250,000 members with, at last count, 66 autonomous affiliates throughout the United States and in several foreign countries — we are the nation's largest, grassroots pro-life organization.

From the very beginning, the focus of our organizations has been education. For tax reasons, the organizations are separate and distinct: The League's mission is to involve the public in the pro-life effort; the Lobby's mission is to influence lawmakers with the pro-life message.

As A.L.L. has expanded, so too have our tools for spreading the pro-life message and fortifying the pro-life effort. Last year, The Gallup Organization, commissioned by Americans United for Life, conducted an extensive public opinion poll on the nation's attitudes about abortion. The results of this poll are interesting from a number of perspectives. For A.L.L., the poll results and the results of other polls like it have taught us a lot about how to face the anti-life challenges of our day.

Among other things, the poll confirmed that the public is terribly confused about what the law currently allows, and what the law should allow, with regard to abortion. Specifically, the public does not understand the legal outcome of the Supreme Court's *Roe v. Wade* and companion *Doe v. Bolton* decisions¹: in effect, constitutionally-mandated abortion on demand.² Astonishingly, many people also think that abortion takes a human life but nonetheless approve of it, at least in some circumstances.³

The implications of these opinions are sobering. They reveal how enormously successful the anti-life forces in our society have been at masking the true effect of the Supreme Court's 1973 abortion decisions, and, more generally, at undermining the sanctity of human life and the law's protection of it. Correspondingly,

these opinions reveal the nature and extent of the work cut out for the pro-life movement.

I joined A.L.L. last February, the third lawyer on staff, in recognition of the need to expand pro-life educational efforts in the legal arena. The timing is crucial, given recent changes and impending changes in the legal landscape of abortion in the United States. In large measure we believe, the pro-life movement's response to these changes will determine the fate of abortion in America.

As you know, in 1989 the Supreme Court decided the *Webster* case. The abortion restrictions upheld in that case were actually very modest (among other things, the Court upheld Missouri law's requirement that abortionists perform viability tests); the decision is more significant for its analysis, which appeared to signal that the Court would uphold greater restrictions on abortion than ever allowed since *Roe v. Wade*.⁴ Since *Webster*, two members of the *Roe* majority — Justices Brennan and Marshall — have retired, fueling the hope that President Bush's replacement appointments will complete a new Supreme Court majority to overturn *Roe v. Wade* at the next available opportunity.

These events have combined to stimulate a flurry of activity within the pro-life movement. Over the past two years, hundreds of bills have been introduced in state legislatures under the pro-life label in an apparent effort to take advantage of this legislative opportunity. Although these bills have taken a variety of approaches, the ones that have likely provoked the most controversy — both inside and outside the pro-life movement — are those that attempt to outlaw some but not all abortions.

Typically, this type of bill takes the form of a general prohibition on the performance of abortion with exceptions in some or all of the following cases: babies who would be born with profound and irremediable physical or mental disabilities; pregnancies resulting from rape or incest; threat to the mother's physical health; and threat to the mother's life.⁵ In shorthand, these abortion exceptions are known as fetal deformity, rape, incest, health and life of the mother. When included together in a bill, their apparent purpose is to outlaw abortion as a method of birth control.⁶

It was before I became affiliated with A.L.L. that I first became aware of the effort to enact these, what I will call, "exceptions" bills. At the time, they sounded like a good idea to me. After all, a majority of Americans appear to favor abortion only in limited circumstances such as these.⁷ And, according to statistics, an overwhelming majority of abortions are performed for reasons other than those reflected in the exceptions.⁸ So, why not save as many babies as we can as soon as we can? We can always, I thought, go back and try to amend the law to save more lives next year.

At first glance, these points appear compelling, particularly in the context of a legal environment that, for the first time in almost two decades, may be amenable to restricting abortion on demand. It was only after I took the time to explore the ramifications of the "exceptions" approach that I realized it is an approach doomed to fail and one unworthy of the pro-life cause. In sum, it

compromises pro-life principle for very little in return. For the remainder of my remarks, I would like to share with you the reasons that have convinced me of this — reasons compelled by the excellent work of Professor Charles E. Rice of the Notre Dame Law School and others at A.L.L. who have addressed this issue before me.⁹

I will be analyzing the “exceptions” approach from two perspectives: first, from the perspective of its consequences on pro-life principle, and second, from the perspective of its practical consequences. At the outset, however, I want to emphasize that my purpose here is not in any way to question or disparage the motives or sincerity of those who advocate the “exceptions” approach. My purpose, rather, is to examine its objective merits and to persuade you, as I have been persuaded, or to at least raise some questions in your mind, regarding the proper approach we, the defenders and the educators of the right to life principles, should be taking to end the tragedy of abortion through our legislative process.

I also want to make clear that the focus of my examination here is an approach that *promotes* “exceptions” bills. This must be distinguished from an approach that promotes only legislation designed to achieve total legal protection for all preborn, but acknowledges realistically that, in spite of our best efforts, we may have to accept under protest exceptions to such total protection as a result of the political process over which we have no control. In other words, my analysis and critique here are of an approach, which A.L.L. does not endorse, that takes the *initiative* in promoting laws outlawing some but not all abortions.

That being said, let us examine “exceptions” bills in light of pro-life principle.

The Perspective of Principle

The foundation of the pro-life message is that all human life is sacred, that every single human being has an inalienable right to life, which must be protected from fertilization until natural death. In the context of abortion, the pro-life message becomes the personhood principle: All preborn babies are persons, and all persons have the inalienable right to life.

In their wisdom, our Founding Fathers recognized that all persons are endowed by their Creator with this inalienable right to life. This means that each person’s life is given to him or her by God and cannot be transferred to or by another. Even for those in our contemporary society that do not acknowledge God as the source of our existence, it is self-evident, by dint of natural reason and the foundations of our democratic society, that all persons have the equal right not to be killed unjustly; it is not religious dogma or theological opinion but scientific fact that a new human life comes into existence at the moment of fertilization.¹⁰

Thus, in seeking protection for the preborn, the pro-life movement has consistently sought the Government’s acknowledgement and protection of what all human beings already possess: the inalienable right to life.

The anti-life movement, on the other hand, rejects the personhood principle. Rather, that movement has adopted a functional definition of personhood so that a human being is considered a person, entitled to legal protection, only to the extent that he or she is wanted and can function in society.¹¹ This movement, we know, has been enormously successful, as reflected in both our culture of abortion on demand and the growing euthanasia movement.

In the war over restoration of the sanctity of human life, an “exceptions” bill, albeit unintentionally, accepts the enemy’s terms of battle. Under such bills, a preborn child may be killed in certain specified circumstances that boil down to those in which, for various reasons, the preborn child is unwanted or will, it is alleged, be unable to function in society. In other words, “exceptions” bills contradict pro-life principle: All human beings are not persons entitled to the inalienable right to life.

Closer examination of each exception should make this clear.

The fetal deformity exception permits the abortion of babies who would be born with profound and irremediable physical or mental disabilities. The simple truth about this exception is that it denies the right to life on the basis of handicaps. Even if this exception can be limited to only the few, most seriously handicapped babies, a point I will challenge later, its implications for pro-life principle are profound.

Once it is admitted that even a few “less than perfect” individuals do not have a right to life, the principle that all life, preborn and born, is sacred cannot be supported. Given such an admission, I dare say, none of us are safe. Moreover, as one handicapped woman wrote recently in the *Catholic Standard*, “I lead an active, productive life, both as a member of my family and my community Abortion [of the handicapped] is an unforgivable waste of possibility [T]he world is different because of me.”¹²

The rape exception is one of the most frequently discussed with regard to abortion legislation. The exception’s popularity and political appeal derive from the public’s general abhorrence of the crime of rape and the strong temptation to do away with anything that brings to mind the violation of an innocent woman.

Yet, if, under pro-life principle, all innocent human life is to be protected, the child conceived by rape must be allowed to live. The preborn child is not responsible for the crime of his or her father; indeed, if aborted, the child receives even greater punishment than the rapist. Certainly, the ordeal of the woman who carries the child of a rapist cannot be minimized, and the resources of our society should be mobilized to ease her burden. The injustice suffered by the rape victim, however, does not diminish the fact that to kill an innocent child is unjust. Moreover, the abortion of the child produced by rape does not erase the scars of the violation and may actually compound them, in view of the many physical and psychological complications of abortion.¹³ In addition, it opens the woman to a second victimization from her rapist — he can defend himself by alleging that she claimed rape to obtain an abortion. Thus, the rape exception also undermines another core truth of the pro-life

movement — that child-killing will not solve the mother's or society's problems.

The incest exception raises concerns similar to those raised by the rape and fetal deformity exceptions. With incest that is nonconsensual, as with rape, justice demands that the innocent child not be punished for the sins of his or her father. In addition, the abortion of a child of incest will not take away the anguish, shame and pain of the victim and may actually compound them and empower her abuser. Although fetal deformity may be an increased risk in incest cases among blood relatives, the principle that all human life is sacred cannot support abortions of babies considered "less than perfect."

Perhaps the most readily acceptable and understandable exception is the one to protect the mother's life. Thanks to modern medicine, there are, apparently, no situations where abortion is medically necessary to save the life of the mother.¹⁴ Even if there were, pro-life principle does not recognize any hierarchy in lives — all persons have an equal right to life. Thus, it is inconsistent with pro-life principle to intentionally kill one life to save another. Correspondingly, if pro-life principle does not allow for an exception where the life of the mother is concerned, it certainly does not allow an exception for the lesser concern of the mother's health.¹⁵

A helpful analogy on this point is to two people swimming toward a one-person raft in the middle of the ocean; one is not permitted to kill the other, even to save his own life.¹⁶ Likewise, in maternity cases, the physician should be required to use best efforts to treat and save both patients, the mother and her child; the physician should not be allowed to kill intentionally either of them.¹⁷

An important and sometimes confusing distinction must be drawn here. Pathological physical conditions, such as a cancerous uterous and ectopic pregnancy, may require life-saving treatment of the mother that results in the death of the preborn child if the treatment cannot be postponed until viability. These cases are not, morally or legally, considered abortions in that they do not involve the intentional killing of the preborn child. No prosecution has ever been attempted in this country based on the treatment of such condition.¹⁸

Thus, each exception is inconsistent with the pro-life principle that all human life is sacred and merits the equal right to life. Rather, the exceptions are consistent with the anti-life ethic, which defines personhood on the basis of whether the mother wants her child or whether she believes the child will be able to function in society. "Exceptions" bills put pro-lifers in the position of admitting the legality of killing certain human beings based on their value to others, not their intrinsic value.

The pro-life movement will never be effective defenders and credible educators of pro-life principle by espousing such an approach. Put yourselves in the shoes of the legislature that has passed in its previous session an "exceptions" bill, probably in an emotional and hard fought battle. Is it likely your would want to address the subject again, for even years to come, and even if you were, would you be convinced of the need to protect the Down's syndrome babies pro-lifers were not willing to protect last year?

Or, put yourselves in the shoes of the Supreme Court Justices. Would you be convinced of the State's alleged recognition of, and commitment to protect, the personhood of the preborn if its "exceptions" law allows certain preborn children to be killed for reasons that children who have been born cannot?

Finally, try, if you can, to put yourselves in the shoes of the many Americans, the so-called "mushy middle," that apparently believe abortion takes a human life but nonetheless approve of it, at least in some circumstances. These people, it would seem, have accepted the anti-life view that the law need not respect all human life. Would you be convinced otherwise by a pro-lifer promoting exceptions? Would it not all sound the same to you?

We must not forget: Just like the cause that freed the slaves, the pro-life movement is a moral cause based on God's justice and the justice of natural reason. The public knows that fundamental truths are unchanging. Unless they have firm convictions about an issue being debated, people are likely to view the side that never wavers as the side that is morally correct. The anti-life side never compromises, it never wavers, not even an inch: Because of the principle of "choice," they say, there can be no limits whatsoever on abortion, no matter what the circumstances.¹⁹ Just as politicians who "flip flop" lose credibility with the public, so too will a movement that acts in direct contradiction of its basic premises.

The Practical Perspective

The concern that "exceptions" bills violate pro-life principle is heightened by the realization that, in all likelihood and as a practical matter, such bills will stop few if any abortions. This is so, primarily for the very reason such bills are promoted in the first instance: the reality of the abortion culture in America. For almost twenty years now, our society has lived with so-called constitutionally-mandated abortion on demand. Those steeped in this culture and comfortable with weighing the relative value of human lives will be applying the law. Is it, then, reasonable to believe that the exceptions will be narrowly confined to the circumstances in which statistics show a small percentage of the abortions are performed? More fundamentally, is it even reasonable to insist on a narrow construction when an "exceptions" law admits by its very nature that weighing the relative value of human lives is acceptable?

Let us examine each exception again in order to answer these questions.

First, the fetal deformity exception. Under this exception, preborn children with physical or mental disabilities deemed profound and irremediable can be aborted. Down's syndrome probably fits into this description. How about spina bifida? The absence of a limb or kidney? What if prenatal testing could diagnose cerebral palsy, multiple sclerosis, schizophrenia, or the condition with which Helen Keller was born? Certainly to some people, these can be profound and irremediable physical or mental disabilities. Moreover, prenatal testing is not always reliable and may lead to the diagnosis of 50% chance —

or more or less — of disability. These uncertainties suggest that a host of “disabilities” and possible “disabilities” can fall into the fetal deformity exception if the woman wants an abortion and an abortionist is willing to accommodate her.

Second, rape and incest. As you may know, the actual incidence of pregnancy as the result of rape or incest is low.²⁰ Logically, however, any law that provides an incentive to allege that a crime has been committed invites fraud. Because, under this exception, an abortion may take place prior to the completion of any investigation by law enforcement officials, there is little deterrent to fraud built in.

Consider as well the current debate on “date rape.” The debate centers, at least in part, on an effort to redefine the traditional concept of criminal, forcible sexual assault to include, the “experts” variously contend, “any sexual intercourse without mutual desire,” “sex when [the woman is] not in the mood, even if she fails to inform her partner of that fact,” or intercourse without “explicit consent” (and silence does not equal explicit consent).²¹ Given the “date rape” debate and susceptibility to fraud, it is difficult to conclude that rape and incest exceptions will result in only a limited number of abortions.

Finally, life and health of the mother. In 1990, obstetrician and gynecologist and former abortionist Bernard Nathanson flatly stated to a committee of the Idaho House of Representatives:

The situation where the mother's life is at stake were she to continue a pregnancy is no longer a clinical reality. Given the state of modern medicine, we can now manage any pregnant woman with any medical affliction successfully, to the natural conclusion of the pregnancy: the birth of a healthy child.²²

Alan Guttmacher, the late abortion advocate and Planned Parenthood official, acknowledged as much as early as 1967.²³

Apparently, then, there are no situations in which abortion is medically necessary to save the mother's life. This does not mean, however, that no abortions will be performed under a life of the mother exception. Abortionists have already admitted to giving it creative interpretations. For example, one Colorado abortion clinic director has claimed that carrying pregnancy to term is about 100 times more life-threatening than having an abortion; based on his view that any pregnancy is life-threatening, he was able to certify that the mother's life was endangered in order to obtain federal Medicaid reimbursement.²⁴

It follows that if pregnancy is viewed more dangerous to life than abortion, it is likely that any objective physical/mental or subjective emotional condition of the mother will qualify the pregnancy as a threat to her health. It has even been suggested in the medical community that financial and social considerations constitute health factors.²⁵

Thus, the specified exceptions are not necessarily narrow circumstances in which few abortions can be performed, but giant loopholes allowing, potentially, most if not all abortions to continue. History has already shown

that you cannot have just a little bit of abortion. The exceptions, then, abandon pro-life principle for little in return.

What, then, are pro-lifers to do? It is true that in many states it is currently politically impossible to enact legislation to save all preborn children. This does not mean, however, that pro-lifers should not support any legislation unless it stops all abortions immediately. Adherence to principle does not mean abandoning all hope of political victory, even if the gain is only an incremental step toward protecting all human life.

There are a variety of legislative measures that provide ways to reduce the number of abortions without denying or undermining the personhood of any child, without advancing the notion that human beings may be killed if they are unwanted for some reason or are “less than perfect.” Such measures include those forcing abortion clinics to meet basic health and safety standards and to maintain proper malpractice insurance coverage; requiring a waiting period and the provision of information to the mother prior to an abortion; mandating the notification of a parent or spouse prior to an abortion; restricting health insurance coverage of public employees, and the use of public funds and facilities, for abortion; and promoting compassionate alternatives to abortion, such as adoption. A number of these as well, in addition to measures requiring abortion complications to be publicly reported, provide an ideal mechanism for educating the public about the dangers of abortion to the pregnant woman and her preborn child.²⁶

Such measures must be carefully crafted to make sure that they do not recognize or create a legal right to abortion. Nonetheless, if outright abortion prohibitions are unrealistic in a state’s current political climate, there is no harm done to the personhood principle by attempting protection for babies on this incremental basis.

The *Webster* case and recent changes in the composition of the Supreme Court have opened the door of extraordinary opportunity for the pro-life movement. Pro-lifers are now freer than ever before to enact the truth of our convictions into law.

We must remember, however, that the ultimate goal is not passing legislation but changing hearts and minds. Remember the poll results I mentioned earlier: Many people believe that abortion takes a human life but nonetheless approve of it, at least in some circumstances. It is this attitude—that the value of life depends on circumstances such as handicaps, parentage, inconvenience—that we must change. If respect for human life is restored to society, laws protecting all persons will follow naturally.

This does not mean that pro-lifers should wait for popular culture to recognize the personhood of preborn babies before working in the legislature. The law and legislative process are tremendous moral teachers. No matter what role we play in the pro-life movement—whether we are leaders at the local, state or national level, lobbyists, speakers, experts requested to testify, or concerned constituents and citizens—we are all called to be defenders and educators of the right to life principles. If we are to persuade and educate our lawmakers and the public effectively and credibly in the legislative process, we

must never waver in our message: Abortion is dangerous to women; abortion is not a solution to society's human problems; abortion kills a living person. I guarantee you, there will be plenty of people out there who will be all too willing to compromise. Abortion will not be stopped, however, unless we who know better speak and act at all times consistent with the truth: All preborn babies are persons, and even if handicapped, unwanted or unpopular, all persons have an equal, inalienable right to life. If we make exceptions to the truth, if we compromise it, we destroy it.²⁷

References

1. See *Roe v. Wade*, 93 S. Ct. 705, 732-33 (1973); *Doe v. Bolton*, 93 S. Ct. 739, 747 (1973).

2. See Americans United for Life, Executive Summary: Abortion and Moral Beliefs, A Survey of American Opinion 2, 13-15 (1991); Gallup Poll: America is Pro-Life, *The Washington Times*, Feb. 28, 1991, at G2. See also Bronner, "Most in US Favor Ban on Majority of Abortions, Poll Finds," *The Boston Globe*, Mar. 31, 1989, at 1 (discussing other, earlier Gallup poll results).

3. See Americans United for Life, *supra* note 2, at 1, 5, 10. See also News Polls — "Vast Majority Oppose Abortions," Right to Life of Greater Cincinnati, Inc. *Newsletter*, April 1989, at 2 (discussing 1989 Los Angeles Times poll results).

4. See *Webster v. Reproductive Health Services*, 109 S. Ct. 3040 (1989).

5. See C. Rice, No Exception: A Pro-Life Imperative 73 & nn. 195-66 (1990). See also Utah: "Pro-Life Bill Rushing Through the Legislature," 1 *The Abortion Report*, Jan. 22, 1991, at 1, 2 (discussing introduction and enactment of Utah "exceptions" bill); Utah "Bangerter Signs Pro-life Bill; To Be Challenged," 1 *The Abortion Report*, Jan. 28, 1991, at 1-3.

"Exceptions" bills may be drafted in various ways. The text discusses one typical example. "Exceptions" bills are alike in one key aspect, however: They explicitly make legal the abortion of certain classes of babies.

Failure to protect all babies does not, in and of itself, label a measure as an "exceptions" bill, though. If legislation can be drafted that, on its face, does not expressly legalize the abortion of certain babies, technically, it is not an "exceptions" bill. In considering such a measure with no explicit exceptions, however, one must pay careful attention to the message a bill with implied exceptions might send to the general public. For instance, measures to protect a certain class of babies (e.g., those aborted for sex selection or after viability) or stop certain types of abortion (e.g., saline abortions) would not necessarily contain explicit exceptions. They could infer, however, that some abortions are worse than others — and this is not a message that educates the public on the value of all human lives or on the inhumanity and danger of all abortions. This concern is heightened by the realization that, like explicit "exceptions" bills, implied "exceptions" bills will likely stop few if any abortions.

6. See Rice, *supra* note 5, at 73 & nn. 195-96.

7. See Americans United for Life, *supra* note 2, 5-8 (based on 1990 Gallup poll, within first three months, majority approve of abortion in roughly the four "exceptions" circumstances; after first three months, a majority approve of abortion only in life of the mother and incest "exceptions" circumstances); Bronner, "Most in US Favor Ban on Majority of Abortions, Poll Finds," *The Boston Globe*, Mar. 31, 1989, at 1 (based on 1989 *Boston Globe*/WBZ poll, majority favor ban in roughly four "exceptions" circumstances).

8. See Torres & Forrest, "Why Do Women Have Abortions?," 20 *Family Planning Perspectives* 169, 170-72 (1988).

9. As evident from the footnotes, this paper relies heavily on Professor Rice's No Exception: A Pro-life Imperative (1990). Also heavily relied upon, but not footnoted in every instance, is A.L.L.'s Exceptions: Abandoning "The Least of These My Brethren" (1990) written by Judie Brown, President of A.L.L., and Brian Young, J.D., Executive Director of American Life

Lobby [hereinafter Brown & Young]. Both works are available from American Life League, Inc., P. O. Box 1350, Stafford, VA 22554, and are highly recommended for those who wish a more detailed analysis of the points discussed herein.

10. See Myers, "The Obligations of Catholics and the Rights of Unborn Children" 57 *Linacre Quarterly*, Aug. 1990, at 15, 18 (pastoral statement by Most Reverend John J. Myers, Bishop of Peoria, Ill.). See Also Rice, *supra* 5, at 3-4 & nn. 2-9.

11. Rice, *supra* note 5, at 90.

12. Egan, "Abortion is Clear-cut to a Potential Target," *Catholic Standard*, July 25, 1991, at 7.

13. See, e.g., American Life League, Inc., *Abortion: Your Risks* (1990).

14. See *infra* p. 8 and notes 22-23.

15. Rice, *supra* note 5, at 76.

16. See *id.* at 75 & n. 200.

17. *Id.* at 75.

18. *Id.*

19. See, e.g., "New York: Pro-life Legislators Backing Parental Notice," 1 *The Abortion Report*, May 20, 1991, at 4 (statement by ACLU Reproductive Freedom Project's Kathryn Kolbert carried in May 16, 1991 *Newsday*: "We are seeing more states trying to enact these [parental involvement] laws, and we oppose all these bills — whether they're one parent, or two parent, consent or notification — because we believe they send young women back to the back alleys.").

20. American Life League Inc., "Rape and Incest Exception Not Needed and Unwarranted" 3-5, 8 (1988) (quoting from the Congressional Record remarks made by Hon. Thomas J. Bliley, Jr. (R-Va.) in the U.S. House of Representatives on July 25, 1983).

21. Neuhaus, "Boys and Girls: The Long Way Back to the Obvious," 13 *First Things*, May 1991, at 65, 67 (quoting the "experts").

22. Brown & Young, *supra* note 9, at 22 (quoting Dr. Nathanson's Feb. 16, 1990 written statement to the Idaho House of Representatives' State Affairs Committee).

23. *Id.* at 21-22 (citing *The Case for Legalized Abortion* 9, quoted in H. Arkes, *First Things* 397-98 (1986). See also Rice, *supra* note 5, at 74 & n. 197 (citing additional support for the absence of "life of the mother" situations).

24. Marshall & Brown, "Are Exception Clauses Pro-Life?," 9 A.L.L. *About Issues*, July-Aug. 1987, at 24, 25-26 (referencing, and citing other examples from, 1986 U.S. Department of Health and Human Services Inspector General report).

25. Brown & Young, *supra* note 9, at 25-26 (citing Gleicher, M.D. & Elkayam, M.D., "Birth Control and Abortion in the Cardiac Patient," in *Cardiac Problems in Pregnancy: Diagnosis and Management of Maternal and Fetal Disease* 307 (U. Elkayam & N. Gleicher eds. 1982).

26. Model bills covering several of these areas are available from American Life League, Inc. See *supra* note 9 for the address.

27. See Scheidler, "Don't Tout Abortion With Taxpayer Dollars," *USA Today*, June 6, 1991, at 10A.