

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

Cause No.: _____

HOWSE <i>ex rel. alia</i> v. PLANNED PARENTHOOD, <i>et al.</i> ,)	Class Action Complaint
Plaintiffs and Defendants,)	
)	Injunctive Relief Sought
<i>and</i> ,)	
)	Constitutional Challenge
HOWSE and <i>ex rel. alia</i> v. UNITED STATES,)	
Cross-Plaintiffs and Cross-Defendant.)	Demand for Jury Trial

Declaration of Facts Regarding Abortion and the U.S. Economy

Comes now Relator-Plaintiff, Torm Howse, and respectfully declares the following:

You might as well call abortion-on-demand for what it always has been – “Public Enemy Number One” – because that is exactly what it has been and still is to our national economy, and that is exactly the proper description for what it has done to us financially.

From the housing and real estate bubble collapse, to the institutional meltdowns on Wall Street, to rampant and continual unemployment levels, to the devastations of tax bases for governmental units all across the country, to the rise in food and fuel prices, the ever-threatening insolvency of Social Security and other entitlement programs, to the destruction of private and public pension funds, and everything else, even the entire worldwide Great Recession, you can firmly and solidly blame ALL of that on the true culprit above all others: the one and only abortion, because financially-speaking, there’s really nothing else quite like it for *ensuring* widespread crashes via wealth destruction.

The silver lining is that, precisely because this catastrophic financial impact directly harms everyone, not just certain demographics, it easily transcends all other discussions, and gets right to the urgent heart of required solution: Abortion-on-demand must stop.

We have seen endless debate over “the usual suspects” – morality, religion, ethics, ‘techniques’, States’ rights, bodily privacy, supposed ‘right’ to choose murder, links to other health concerns, moment of life, personhood, and so forth and so on, some even to partial success on their own merits. But, all arguments that tend to pit roughly half of the people against the other half are – by definition and very nature – ultimately destined for large amounts of chaos and varying opinions... all of which causes inevitable *delay* in obtaining the final resolution... Instead, a much more direct argument, one that appeals to ALL sides in such an endless debate, is the one that will finalize the end of discussion.

For the catastrophic issue of abortion-on-demand, that singular argument is its truly horrific train wreck upon the Economy, because nobody can or will deny the undeniable, overwhelming wake of financial annihilation that is the continuing nightmare legacy of abortion upon us all. Moreover, a real solution requires a common understanding, derived via the use of common language. When speaking with pro-choice supporters upon the issue of abortion, we should already know they mistakenly serve Mammon over purposefully serving God, and Psalms and Proverbs are full of reminders that the foolish will simply not listen to the righteous ways of Light, no matter how hard we try using those valid subjects. Therefore, the common language is Mammon, i.e., money, i.e., the Economy, of which even pro-choice supporters and their agents will finally see the light, in the absolute, critical need to end all abortion-on-demand in the U.S. immediately.

Consider the following:

Using any credible per-year statistics found online, such as **Exhibit A**, we find that between 1960 and 1972, there were a total of about 1.3 million abortions during that pre-*Roe* time period, and then, starting after *Roe*, with 1973 and going through and counting 1989, there was another 23.8 million abortions in America. Together, that's slightly over 25 million additional adult citizens, who would otherwise have been from age 18 through 48, living and working in the U.S., at the time of the mid-2008 economic meltdown, had they not been aborted as fetuses. Counting from 1990 through and into that same mid-summer of 2008, there were approximately another 24.9 million abortions, or, those who would otherwise have been additional American children less than 18 years old at the time of the mid-2008 housing bubble and Economy meltdown.

In other words, at the time of the mid-2008 Economy meltdown, there were only a mere 305 million total Americans, some 230 million of which were already adults. But, without the existence of abortion-on-demand, America *would have had* 355 million total in population, about 255 million of those as adults – 25 million more adult consumers, and 25 million more youth consumers... That raw difference building up and missing, over time, finally pulled the entire rug out from under an Economy that was and is root based upon, and necessarily keyed to, expectation and required need of population **growth**, just to financially maintain the status quo, year after year after year...

Speaking proverbially, the original allowance of abortion-on-demand (*Roe v. Wade*) essentially pulled the plug out of America's Economy bathtub, and our nation's wealth then began to start spiraling away, slowly but surely, down the drain, ever since.

Even now, in mid-2012, the American housing industry and real estate markets are in worse shape than they were in mid-2008, when decades of foundational foolishness (abortion) finally began to rear its deeply-nested, ugly heads within our financial markets. Just several months ago, when things were even worse than before, the Fed reported some 15.9 million homes now in foreclosure trouble, with Fannie and Freddie handling approximately 50%, or about 31 million, of the entire nation's total home mortgage loans on account. That's a total of around 62 million home mortgages currently owed in America between Fannie, Freddie, and all the other private banks, etc., combined together. There continues to hover a total inventory of around 4 million (all: existing and new) homes listed as available for sale in America at any given moment, and with a total of around 5 million homes sold in all of America every year. However, before the economic meltdown of 2008, there was usually only around 1.5 million total existing and new homes listed for sale at any given moment... As the cycle became worse, in January of 2010 there were already some 18.9 million vacant homes, altogether in America, out of a total of around 131 million homes/households, and several months ago, Time magazine reported the figure still at extreme excess, at 15.9 million vacant homes. It is not difficult to understand that, had there been an additional 20-25 million adult consumers in America – who were otherwise never aborted before birth – also needing their own homes/households, that the mortgage bubble meltdown of 2007-2009 would not have even happened, at all, whatsoever, and today our housing industry (and all the millions upon millions of good-paying jobs that rely upon it) would be just as strong and healthy as ever, and our vast real estate markets (and all the financial markets that are

keyed into those) would also be just as strong and healthy as ever... Indeed, the entire world – which was also basing its finances upon the world currency reserve, i.e., our U.S. Dollar – would have most probably never experienced the recent Great Recession, at all, or at least only as some marginal blip passed by.

And, that's just taking **only** the additional American adults, who would have been ages 18-48 now, had they not been aborted, into consideration for just that one financial aspect of American housing and real estate. Don't forget, if not for abortion-on-demand, there would have **also** been another 25 million some additional children in America, which would have required **another** many millions of families to upgrade and buy bigger, roomier homes/households – adding even *more* fuel and value continuously into the ever-growing housing, real estate and financial markets, even above and beyond the positively-stabilizing effects of what *would have been* those 20-25 million additional adult homebuyers... The combined effect of NOT aborting some 50+ million American adult and youth consumers would have very easily avoided even the slightest notion of “recession” from anywhere within our normal modern conversations.

But, that is **just** about the real estate aspect of our Economy that has been utterly devastated by the existence of abortion-on-demand.

Let's talk about the American motor vehicle industry. Once again, we're talking about another huge sector of the Economy having vast ripple effects, and along with several business feeder chains, comprise many more millions of good-paying jobs on the line, and also tying directly into various financial markets with a very significant overall impact. The exact same negative financial “vacuum” effects of abortion are seen in

similar manner. From 1960 until 2009, the ratios of total U.S. population, versus U.S. licensed drivers, versus registered vehicles in America, slowly transformed from (1960) at about 1/2 of the population having a driver's license, and only 7 cars per every 10 licensed drivers, to (2009) about 2/3 of the population having a driver's license, and there being 5 cars for every 4 drivers. From 1999 to 2007, the heyday of American motor vehicle production and sales, every year averaged 17 million new units sold, more or less. Old cars also get scrapped every year, at the same time, for steel and other uses. In 2009, we scrapped 14 million vehicles, but only produced and sold 10 million new vehicles, actually reducing our national "fleet" of passenger vehicles from 250 million, down to 246 million. That was also the first year China exceeded America in total new car production/sales, the first year any nation had **ever** surpassed America's long-standing position as undisputed worldwide king of the motor vehicle industry.

But, again, if there had NOT been abortion-on-demand, and just like the effects within the housing/real estate world, that's another 25 million some additional adult consumers for the various shiny products rolling off the Big Three's dealer showroom floors, and another 25 million new children vehicle passengers out there, requiring another several million families to upgrade their smaller cars for larger and more expensive vehicles. GM and Chrysler would have **never** needed any bailouts, whatsoever, because they would still (all three) be working hard to keep up with growing demand every year. Indeed, the numbers translate into a roughly 10% increase in consumer demand per year, *every year*, over what we have instead had... That's a whopping amount of demand, not only far more than enough to have continually fueled tremendously-solid growth in all

three of the Big Three automakers, but probably also to have precluded some of the former sub-brands (Oldsmobile, Plymouth, Saturn, etc.) from ever going away, *in the first place...* The automotive corporations, their supply chains, factory workers, and their financial institutions would still be singing at the tops of their profits voices, like cruising along in a convertible on a bright, sunny day. However, America, as a nation, can genuinely thank abortion-on-demand for pumping the brakes hard against all of that. And, they talk about a deer being blinded by the headlights?

Repeating for good and clear measure, if not for abortion, America would today have nearly 11% more adult consumers than it does now, would today have approximately 33% more youth consumers (roughly 75 million v. roughly 100 million), and we would today have an overall 16-17% total more consumers within the equation, needing not only many millions of additional new homes and cars, but also millions of additional car insurance policies, millions of additional homeowner's insurance policies, millions of more life insurance policies, and many millions upon millions upon millions of additional big electronics goods, major appliances, vacation trips, smartphones, savings and checking accounts in many more bank branches, various pieces of furniture and lawn and garden items, literally untold millions – even billions – of additional clothing items, shoes and other accessories, cosmetics, medicines and medical treatments, as well as cans, boxes and bags of pet foods, and the lists become even more lists, and it all goes on, and on, and on, and on, and on... an incredible, overwhelming total number of positive financial effects, everywhere, and for everyone, far too large, and far too vast, to even begin to reasonably grasp in its awesome true scope.

But, let's don't just stop there, because the overwhelming impact of abortion-on-demand is certainly not limited to just physical business production enterprises. It is also clearly about jobs – millions upon millions upon millions of jobs – everywhere, in virtually everything you could ever even think of, literally from soup to nuts. The above paragraphs give just a brief iceberg tip look into the wide universe of consumer-driven economic benefits, and that's only the supply-and-demand side of things, as just one aspect of abortion devastating our overall Economy.

But, what about those jobs? What do jobs mean to our governments, that are *also* paid for by us, i.e., that also have a direct economic interest to us? Well, without these many millions upon millions of additional (non-aborted) now-adult workers and (non-aborted) children buying additional products and fueling continuous economic growth strength, we see that demand and supply eventually will swap ratio paths, and the whole ball of wax begins melting – sales are down, so business has to cut back in order to try and remain alive until sales revive, so jobs are temporarily lost, then permanently lost, bills get unpaid, financial institutions post unexpected large losses, shareholders suddenly can't afford lavish Christmas parties, so retail demand goes further down, and the cycle gets even more vicious as time passes by...

In other words, without those 50+ million additional, would-have-been American consumers (aborted), eventually would come a point where there would simply not be enough overall, consistent demand **growth**, to keep the other 230-some million adults (a number which also continuously grows..) all working at full *enough* pace, and the longer that abortion-on-demand was tolerated and allowed, the greater the disparate lag became

over time, and the economically worse it got... It was all bound to happen, sooner or later, and only the magical brilliance of some pretty fancy accounting games kept the numbers deceptively floating for longer than they otherwise would have zonked.

Simply put, because of abortion, the inescapable mathematical progression consequences eventually crashed into each other, and our U.S. Economy shrieked into a hundred-car pile-up on the highway, bouncing some damages backwards into everything else nearby, including jobs. And, without jobs, the government's tax revenue base plummets, causing even deeper financial troubles, not only for maintaining services, but exponential future financial disaster for something still lurking in the shadows. Just like the pension funds of large private corporations dramatically impacted by these huge, consistently-sustained losses in our Economy, so do the various unions of both private business, and of local, state and our federal governments likewise get slammed by the slowly-unfolding consequences of having the rug of its own "supply and demand" chain pulled out from under it, by widespread losses of jobs, and therefore of tax revenues. While a separate argument can easily be made for reduction of overall government, anyway, that is a whole 'nuther subject, for another day. The point of abortion-on-demand is that it is **also** clearly responsible, through widespread losses of jobs, and therefore by large and sustained losses of government "business" income (individual and corporate tax revenue streams), of wreaking utter havoc and devastation into our nation's various types of pension funds and similar financial instrument accounts.

In fact, this is the exact core reason behind the ever-threatening implosions of Social Security, Medicare, and etc. For since time began in very ancient civilization, every

nation has *inherently* relied upon the basic mathematical feed of an ever-growing younger population providing for the needs of the older population, which is (was) always smaller in number than the middle-aged, which is (was) always smaller in number than the younger, now-working adults. You can call it a “pyramid”, or maybe even a “ponzi scheme”, but that is how it has always worked. Whether talking about a franchise business chain, a family farming operation, major political party structuring, insurance underwriting, petition drives, religious endeavors, or whether about many other different kinds of things in life, there is just no escaping the basic, universal mathematical design, of the many at the bottom feeding the fewer at the top. Social Security and the other similar government accounts are no different – because of abortion, they cannot escape the mortal financial wounds forever. At *some* point, even *with* fancy accounting (fraud), they **must** eventually collapse under their own interminable, insolvent weight.

Of course, we could go even further and deeper into various other aspects impacting our Economy in progressively-negative ways, too, but you get the idea about all of the vast **unintended** consequences of abortion-on-demand. However, there are also the many intended and known consequences of abortion impacting our Economy, such as insanely and actually **subsidizing** abortion with taxpayer dollars, or, for that matter, with ANY funding, whatsoever – for, when you begin to fully understand the horrific nightmare that abortion has caused into our Economy, why would *anyone* even think of funding or promoting our own financial doom, at all? Then, there’s also the costs of abortion recovery, the permanent social and mental scars, costs of lobbying for and against abortion, costs of research for and against, costs of litigation, and enormous costs

in American time and communications and productivity being wasted on even having such a truly frivolous and ridiculous debate in the first place... It is all utter insanity, still currently in progress.

And yet, ALL of the above is STILL not even covering the full bases. What if we started to discuss probability statistics on how many of those now-aborted 50+ million fetuses would have eventually grown up to invent new technologies, new products, new medicines, new scientific discoveries, new artistic expressions, new forms of music, new forms of learning and thinking – and, once again, the effects go on and on and on...

There's one thing to be clear within such "what if" predictions: At the very least, we can be sure that some of those new ways and ideas and solutions would have either increased and/or saved the lives of some unknown *more* millions of Americans, all of which would have strengthened our Economy even that much further, under any and all of the previous scenario descriptions touched on above.

No, to be absolutely plain, as plain as the nose on our own face, the allowance and toleration of abortion-on-demand **IS**, by far away and above, **THE** single most central contributing factor to have imploded our once-mighty Economy, literally from the inside out, and into the horrifically twisted train wreck it now is.

There can be no more **reasonable** discussion, once finally including the sheer and overwhelming financial aspect into the debate, that abortion-on-demand must cease, nor that the timing of that must be immediate, if not sooner. Raw financial mathematics simply do not lie. Even the pro-choice supporters and their godless liberal agents, while denying morality, ethics and everything else reasonable, still cannot deny straight-up,

glaring, overwhelmingly juggernaut conclusions of all-encompassing mathematics. The simple, inescapable truth is that America just cannot afford to have abortion-on-demand, and *never could* afford to have it before, either... Within any given individual pregnancy there will **always** be high emotions, but, as for America, the nation, itself, we simply cannot afford it, and never could.

No, the question is not whether or when abortion should be terminated as a legally-accepted practice. Indeed, the issue is, in true and obvious fact, a very highly important national security issue, and simply well put as: abortion = national financial insanity. The truth is painfully crystal clear: Every single government leader should immediately declare a full moratorium against abortion, as fast as is business-day possible, just for the financially-horrific consequences alone.

All fifty (50) state Governors and/or Legislatures should immediately enact whatever is reasonable and appropriate, even by special, emergency action as available. Except for the (fairly rare) traditional exceptions, i.e., in case of rape, incest, imminent harm or death of the mother, or serious fetal deformity raising significant standard-of-life issues, all abortions should, in fact, be criminalized again, as being directly against the compelling interest and law of the state in protecting life for its economy to survive, plain and simple.

No, the real question is not whether or when to cease abortion-on-demand – the only possible answer, financially-speaking, is yes and absolutely immediately. The real question concludes this writing, and the solution is left up to the experts out there, over just how fast, and in what ways, to recapture our best nominal population **growth** again, after doing away with all abortion (except for within those rare exception scenarios).

Make no mistake – four plus decades of allowing widespread abortion-on-demand, up to a massive 1/3rd of all otherwise-live births for many years, has definitely and deeply left a mathematical gash askew within our various population age level ratios. But, even after terminating 99.x% of all abortions, as fast as is administratively and/or legislatively possible – even if all completely done, for the entire nation, by the end of this next business week – that would STILL leave America and the U.S. Economy mathematically crippled for some 25 to 35 years yet to come, before things finally began to level off again, all on their own. What must *actually* happen, in order to get America back on financial track sooner, is accelerating population recapture back to nominal growth ratios.

In other words, we need more babies being born, and **lots** of them... What we *need* to implement, just as immediately as stopping abortion, itself, is some form of tax credits and/or other types of social and/or financial incentives, to reward marriages that stay together and produce more than 2.1 replacement offspring, i.e., we actually *need*, and even very desperately *need*, financially and mathematically speaking, many millions of marriages to produce either **3**, **4**, or **5** children, and *that* means, in fact, many millions more than the ones who *already* are having that many children. We need, as a long-term national security interest for America’s economic survival and renewal, for the “experts” out there to figure out how many extra children should be encouraged, for how many years in a row, and etc., to get us back into the correct flight path – something akin to how NASA engineers had to balance a shuttlecraft’s just-right angle for re-entry back into our own thin atmosphere: too little of an angle and we will skip off into outer space, but too much of an angle and we will dive into a flaming burn, figuratively speaking.

Even the pro-choice supporters and their wayward liberal agents cannot deny the horrific, utterly devastating financial nightmare of what allowing abortion-on-demand has done to America's Economy, and, for the exact same reasons, also unto the economies of other nations, all around the world... Indeed, the very first major industrialized nation to finally end abortion-on-demand will be *light years* ahead, economically, in the global aftermath race to restore national treasuries, currency values, and personal wealth. That nation, whether America or another, will instantly gain several percentage points in the big scheme of world economic competitive advantage, just because of how mathematics trend out in lag delay and progression rate on these related financial issues.

Money: It is the common language that pro-life supporters can speak *with* pro-choice supporters, and where common solution will finally be reached, because they can ALL also see the direct, cataclysmic financial effects upon even themselves.... So, forget about the endless debates, and cut to the chase: Abortion-on-demand **must** stop now.

Why? Because the very financial survival of *every single American*, as well as our entire American nation, itself, absolutely hinges and depends upon it.

Respectfully submitted,

/s/ Tom Howse

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