

EXHIBIT 92

Rosalie Markezich Declaration

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

THE STATE OF LOUISIANA,
by and through its Attorney General,
LIZ MURRILL, and ROSALIE
MARKEZICH,

PLAINTIFFS,

v.

U.S. FOOD AND DRUG
ADMINISTRATION; MARTIN A.
MAKARY, M.D., M.P.H., in his official
capacity as Commissioner of Food and Drugs,
U.S. Food and Drug Administration;
GEORGE FRANCIS TIDMARSH, M.D.,
PH.D., in his official capacity as Director,
Center for Drug Evaluation and Research, U.S.
Food and Drug Administration; U.S.
DEPARTMENT OF HEALTH AND
HUMAN SERVICES; and ROBERT F.
KENNEDY, JR., in his official capacity as
Secretary, U.S. Department of Health and
Human Services,

DEFENDANTS.

Civ. No. 6:25-cv-01491

Judge: _____

Mag. Judge: _____

DECLARATION OF ROSALIE MARKEZICH

I, Rosalie Markezich, a citizen of the United States of America and a resident of the State of Louisiana, declare under penalty of perjury under 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge.

1. I am over eighteen years old and make this declaration on personal knowledge.
2. I was born in Mandeville, Louisiana, in 2001 and—with the exception of the year 2017—have lived in Louisiana since that time.
3. Around October 2023, my then-boyfriend and I had unprotected sex. Afraid he got me pregnant, he procured and I took Plan B (also known as the “morning-after pill”). I didn’t think I was ready to have a child at that moment because of my financial situation. And my boyfriend and I had only been dating for two months.
4. I found out I was pregnant on October 13, 2023. I had missed my period, so I took a pregnancy test. Deep down, I knew it would be positive. And deep down, I was hoping it would be positive. And when I saw the positive pregnancy test, I just smiled. I was overjoyed that Plan B had not worked.
5. I wanted to keep my child and feared my boyfriend’s reaction, so I debated whether to tell him that I was pregnant. Ultimately, I decided he had the right to know.
6. When I first told my boyfriend that I was pregnant, he was excited and wanted to live together. He said raising our child together would be “legendary.” But he soon changed his mind. He said his sister knew how to get chemical abortion drugs, and he wanted me to take them.
7. Using my personal email address and mailing address, my boyfriend filled out an online form and ordered the drugs (mifepristone and misoprostol) from an online provider that his sister has used multiple times before.

8. He sent me \$150 through the Venmo banking app to pay for the drugs he ordered. I forwarded the payment directly to the prescriber, Remy Coeytaux, MD PC, the next day. This was the only touch point I had with a doctor before receiving the drugs.
9. The drugs were sent from a provider located in California and delivered to my home address in Louisiana a few days later via the United States Postal Service. The tracking number was 9400109105156542182650.
10. I did not want to take the drugs. When I saw my boyfriend the next weekend, I pretended that I had already taken the drugs, but he did not believe me.
11. We took a drive to discuss the matter further. My boyfriend said that his life would be ruined if I kept the baby. I stood my ground. I repeated that I wanted to keep the baby and would raise the baby with my mother in Michigan. But he did not like that plan either. He did not want a child, let alone a child he would have to support in another state. I told him that if I aborted this child, I would never be the same. I pleaded with him: "Don't make me do this."
12. He became angry. He abruptly pulled the car into a hospital parking lot and started shouting at me. My boyfriend had anger issues and a criminal record, so I was terrified and started crying. I also have suffered prior domestic abuse, so I knew the signs of an unpredictable man and that I needed to be careful about my next move. My roommates did not know that I was with him. Should anything happen to me, no one would know where I was. So to pacify him, I told him I would take the drugs. I planned to throw up the drugs as soon as I could.
13. My boyfriend took me to his house and watched me take both drugs at the same time. I had hoped that taking them simultaneously might stop them from working. He started to drive me home, but I had a panic attack during the drive because I feared for my baby's safety and that I would not be able to throw up the drugs in time. I shook violently and my arms locked up. So he turned around and took me back to his house, where his parents also lived.

14. I went to the bathroom to throw up the drugs, but I was unsuccessful. Ten minutes later, I started bleeding. I lay in the bathroom for approximately an hour, bleeding and crying for the loss of my child. I could not look at my boyfriend. To avoid him, I went to the garage and lay there on a blood-soaked towel for the rest of the night.
15. In the morning, my boyfriend was still mad. After his mother brought me a stuffed animal and I refused it, he threw the stuffed animal across the room. I climbed into bed and stared into space for the rest of the weekend. I continued to bleed heavily for about a week.
16. I did not want to have an abortion.
17. I was a daycare teacher and worked with one-year-old children. When I returned to work on Monday, it was so hard being there knowing that I would never hold the hand of my own child. I mourned the child I thought I was going to have. I eventually switched jobs so I could work with older children at a Christian school.
18. The trauma of my chemical abortion still haunts me. I often re-live the experience of feeling forced to abort and lose my baby, causing me to become anxious, depressed, and afraid. Because of this ongoing trauma, I am seeing a psychiatrist who has prescribed me medication to help relieve these effects. My trauma also hurt my relationships with my friends and roommates, who could not understand why I needed so much time and space to heal. I am still healing.
19. Had the FDA required an in-person visit with a doctor before dispensing the drugs, my boyfriend would never been able to obtain the drugs that he made me take. I also would have told the doctor that I did not want to take them. And I would have told the doctor that I wanted to keep my baby. I do not believe a doctor would have prescribed me the drugs if I told her I did not want them.
20. I searched for post-abortion support online and came across a pro-life webpage. I was eventually connected with a counselor who helped me heal by pointing me to

God. I am grateful for her support and prayerful encouragement. With her help, I started to glue my heart back together.

21. I attempted to hold a baby supply drive on the anniversary of my due date, but I was unable to pool enough resources in time. I would still love to do so in the future to honor my baby.
22. In 2024, I testified under the pseudonym "Samantha" in support of Senator Thomas Pressly's SB 276. And I am sharing my story now because I want to be the helper I wish I had.
23. No woman should have to experience what I went through.

Executed this 17 day of July, 2025.

By Rosalie Markezich
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