

# EXHIBIT A

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, *et al.*,

*Defendants.*

Case No.: 6:25-cv-01491-DCJ-DJA

Judge David C. Joseph

Magistrate Judge David J. Ayo

**DECLARATION OF ERIN TONER**

Pursuant to 28 U.S.C. § 1746, I, Erin Toner, affirm under penalty of perjury:

1. I am over the age of 18, have personal knowledge of the matters set forth herein, and am competent to make this Declaration.

2. I serve as the Human Resources Program Director in the Louisiana Department of Justice (“DOJ”). In my role, I manage the Louisiana DOJ’s HR department, aligning HR strategy with business goals. I oversee talent acquisition, compensation, compliance, and employee relations. I also act as a vital link between staff and executive leadership.

3. The Louisiana Bureau of Investigation (“LBI”) is a department of the Louisiana DOJ. LBI is responsible for the investigation of criminal activity, intelligence gathering, and case and technical support in Louisiana. LBI contains several “divisions,” including the Criminal Investigations Division and the Special Investigations Division.<sup>1</sup>

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<sup>1</sup> See *About the Bureau of Investigations*, Louisiana State Police, <https://lsp.org/about/leadershipsections/bureau-of-investigations/> (last visited Feb. 12, 2026).

4. LBI is involved in the investigation of the shipment of abortion drugs into Louisiana for the purpose of causing illegal abortions within Louisiana’s borders..

5. In just three distinct matters covered by that investigation, LBI reports that it has spent approximately 440 hours dedicated to investigation, travel, and other related operations.

6. The lead LBI investigator’s current hourly rate is \$40.01. Therefore, in the course of the 440 hours devoted to these three distinct matters, LBI has expended approximately \$17,604.40 of the investigator’s time, not including the investigator’s travel and other operational expenses.

Executed in Louisiana, Louisiana, this February 17 2026 day of \_\_\_\_\_, 2026.

Signed by:  
*Erin Toner*  
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Erin Toner