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SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF ALAMEDA

THE PEOPLE OF THE STATE OF
 CALIFORNIA,

Plaintiff,

v.

HEARTBEAT INTERNATIONAL, INC.,
 AND REALOPTIONS, INC.,

Defendants.

Case No.: 23CV044940

**Declaration of RealOptions CEO
 Tasha Keirns in Support of Defendants'
 Motion for Summary Judgment or,
 Alternatively, Summary Adjudication**

Judge: Hon. Patrick McKinney
 Dept: 18

Action filed: September 21, 2023

1 I, Tasha Keirns, declare and state as follows:

2 1. I am the CEO of defendant RealOptions, Inc. (“RealOptions”), a 501(c)(3) non-profit
3 organization with four state licensed community health clinics that provide free abortion pill reversal
4 treatment to women who come to us looking for intervention after beginning the chemical abortion
5 process. I submit this declaration in support of Defendants’ motion for summary judgment or,
6 alternatively, motion for summary adjudication.

7 2. I have previously served as the RealOptions Director of Nursing and later Executive
8 Director. When this action was initiated, the CEO of RealOptions was Valerie Hill. However, she has
9 since retired and I filled her role. In this action I was deposed as a corporate representative of
10 RealOptions under Code of Civil Procedure section 2025.230. The matters discussed below are based
11 on my own personal knowledge. I could and would testify to them if called upon to do so in court.

12 **TESTIMONY RELEVANT TO SUMMARY JUDGMENT**

13 3. RealOptions, Inc. is a 501(c)(3) non-profit organization with four state licensed
14 community health clinics. In accordance with its Christian mission, RealOptions’ purpose is to
15 provide compassionate, high-quality, life-affirming, and holistic healthcare with or without
16 insurance, to empower and equip women and men to choose life for their unborn children with care,
17 compassion, and honest information to uphold the sanctity of human life. RealOptions uses a low-
18 cost/no-cost model meaning that the vast majority of its funding comes from donors. RealOptions
19 sometimes bills Medi-Cal or insurance but receives less than 5% of its income from program services,
20 and most years less than 1%. (See *About RealOptions*, Friends of RealOptions,
21 <https://www.friendsofrealoptions.net/about-us/>.)

22 4. RealOptions’ comprehensive services include well woman care, STD testing and
23 treatment, pregnancy testing, pregnancy options consultations, ultrasounds, prenatal care, abortion
24 pill reversal treatment, material support, spiritual support, gynecological services, telehealth abortion
25 pill education consultation, reproductive loss support, and optimal health education for parents and
26 students. Founded in 1981, RealOptions has its administrative offices in San Jose, and previously
27 operated five clinics in the Bay Area: Central San Jose, East San Jose, Redwood City, Oakland, and
28 Union City. Since this action was commenced RealOptions has closed the Redwood City location.

Each location is devoted to caring for patients physically, emotionally, and spiritually. (See *About, RealOptions*, <https://realoptions.net/about/>.)

5. RealOptions is an affiliate of Heartbeat International, Inc., an interdenominational Christian trade association that provides affiliated pregnancy help centers (“PHCs”) with informational resources such as model policies and procedures. Separately and independently, RealOptions is a clinic member of Heartbeat’s Abortion Pill Rescue Network (“APR Network”). RealOptions accepts referrals of women seeking abortion pill reversal from the APR Network and also provides abortion pill reversal to women who learn of RealOptions through other means. As an organization with four state licensed community health clinics, RealOptions has been providing abortion pill reversal treatment since 2016. RealOptions has never paid Heartbeat to be a member of the APR Network, or been paid by Heartbeat to be on its list of referral clinics.

6. The basic process of abortion pill reversal involves administration of progesterone after a pregnant woman has taken the first pill in the chemical abortion process, mifepristone, but before a fetal demise is confirmed. Progesterone is an FDA-approved drug that physicians have used for more than 40 years to prevent threatened miscarriages. Chemical abortion is also sometimes euphemistically called medical abortion or medication abortion.

7. Providing abortion pill reversal to women in need, along with all of RealOptions’ services, is a core aspect of RealOptions’ religious duty and commitment to provide truly holistic care. Informing the public about abortion pill reversal is a key part of providing this service. Prohibiting RealOptions from either informing women about abortion pill reversal or actually providing it, or imposing fines on RealOptions for doing so, would severely burden RealOptions’ exercise of religion and freedom of speech.

8. RealOptions speaks about abortion pill reversal for educational purposes, not commercial advertising purposes. Although the RealOptions website contains language derived from Heartbeat’s model FAQs, including the FAQ regarding “How much will this cost?,” RealOptions has never charged any type of insurance, including Medi-Cal, for administering any aspect of abortion pill reversal treatment, including pregnancy tests, ultrasounds, examinations, or supplemental progesterone provided in clinic. If a woman calls outside business hours and needs to purchase

1 supplemental progesterone herself from a local pharmacy, RealOptions offers full reimbursement for
2 the cost of the progesterone at the time of her initial in-office appointment. RealOptions provision of
3 abortion pill reversal treatment is an entirely charitable endeavor.

4 9. RealOptions mentions the possibility of heavy bleeding to a patient seeking abortion
5 pill reversal as part of discussing the mechanism of action of mifepristone and providing education
6 on the symptoms of miscarriage. RealOptions further regularly follows up with its patients who
7 received abortion pill reversal. RealOptions healthcare practitioners have never encountered a case
8 of pregnancy complications as a result of, or attributed to, abortion pill reversal treatment. Sometimes
9 the pregnancy abruptly terminates due to the mifepristone, but RealOptions has never encountered
10 serious side effects from the administration of progesterone to its patients. RealOptions has never
11 been the subject of any malpractice claim as a result of abortion pill reversal therapy, and has never
12 heard of any pregnancy resource center being the subject of such a claim.

13 10. The content on the RealOptions website related to abortion pill reversal, as shown in
14 Exhibits 31 and 32 discussed below, was pulled from model abortion pill reversal information
15 provided by Heartbeat International and then reviewed/approved by RealOptions' medical director.
16 The other educational material in Exhibits 33 through 36 were created by its medical director. When
17 this material was initially created, RealOptions' medical director was Dr. Stephen Belton, who retired
18 in 2019. The content was then subsequently confirmed by RealOptions' interim medical directors
19 and then current medical director, Dr. Mary Davenport.

20 11. Over its entire life, RealOptions' healthcare professionals have provided abortion pill
21 reversal treatment to 81 women. All of these women initially took mifepristone and then sought to
22 reverse their chemical abortions within 72 hours of doing so. From these 81 women, 18 decided to
23 complete their elective abortion. From the remaining 63 women, there were 20 miscarriages
24 (successful terminations), 37 went on to deliver healthy babies, with a total of 40 babies born due to
25 three sets of twins, and currently 6 women that have successfully completed abortion pill reversal
26 treatment with progressing pregnancies and anticipated births in year 2026. This is a rate of 64.9%
27 (37/57) for healthy, delivered babies, which will likely increase to 68.25% (43/63) in 2026. Although
28 Heartbeat requests that members of its APR Network provide information to it about women who

1 have undergone abortion pill reversal, RealOptions has not done that since the beginning of tenure in
2 2021 because of the administrative burden of doing so. Information relayed by our staff indicates that
3 it was not our earlier practice either.

4 12. Prior to this litigation, RealOptions did not maintain a database or excel sheet in which
5 it tracked the specific method of medication administration provided to the women who received
6 abortion pill reversal. However, subsequently, RealOptions was able to go back and review the medical
7 charts of 47 women. Our review was limited to 47 women because after RealOptions began providing
8 abortion pill reversal it transferred from a physical record system that is off-site and difficult to access,
9 to an electronic record system that is easier to access. From these 47 women, 28 (59.6%) received
10 progesterone through a combination of intramuscular progesterone injections during clinic visits and
11 oral progesterone ingestion on other days, which is RealOptions' primary protocol. 18 women (38.3%)
12 received progesterone solely orally which would occur if the woman could not come into the clinic
13 and/or could not receive an intramuscular injection for some other reason. 1 woman (2.1%) received
14 progesterone via intramuscular injection, oral capsule, and vaginal suppository; the vaginal suppository
15 was added because she was unable to keep any oral medications down without vomiting.

16 17 AUTHENTICATION OF EXHIBITS

18 13. Attached to the Appendix of Evidence, Vol. II, as **Exhibit 31** is a true and correct
19 printout of the "Abortion Pill Reversal" webpage on the RealOptions website, located at
20 <https://www.realoptions.net/abortion-pill-reversal/>. RealOptions endorses all of the statements and
21 representations therein on its good faith belief, in reliance on expert medical opinion, that they are
22 true and not misleading.

23 14. Attached to the Appendix of Evidence, Vol. II, as **Exhibit 32** is a true and correct
24 printout of the "Facts About the Abortion Pill Reversal Procedure" webpage on the RealOptions
25 website, located at <https://www.realoptions.net/facts-about-the-abortion-pill-reversal-procedure/>.
26 RealOptions endorses all of the statements and representations therein on its good faith belief, in
27 reliance on expert medical opinion, that they are true and not misleading.

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1 15. Attached to the Appendix of Evidence, Vol. II, as **Exhibit 33** is a true and correct
2 printout of RealOptions' standard consent forms for abortion pill reversal given to women
3 undergoing APR. Exhibit 33-A is the version of the form dated October 1, 2020; Exhibit 33-B is the
4 same form divided into two forms (injection and oral, or just oral) and dated August 21, 2023; Exhibit
5 33-C is the same two forms updated as of November 20, 2024. RealOptions endorses all of the
6 statements and representations therein on its good faith belief, in reliance on expert medical opinion,
7 that they are true and not misleading.

8 16. Attached to the Appendix of Evidence, Vol. II, as **Exhibit 34** is a true and correct copy
9 of additional educational material provided to APR patients during the informed consent process,
10 including information sheets on Progesterone, Ectopic Pregnancies, and Miscarriage Precautions.
11 RealOptions endorses all of the statements and representations therein on its good faith belief, in
12 reliance on expert medical opinion, that they are true and not misleading.

13 17. Attached to the Appendix of Evidence, Vol. II, as **Exhibit 35** is a true and correct copy
14 of RealOptions' "Standing Order for Progesterone Therapy." The standing order is approved by
15 RealOptions' medical director. If a woman presents for abortion pill reversal treatment and fits the
16 criteria in the standing order, then a nurse can provide abortion pill reversal treatment using the
17 protocol in the standing order. Exhibit 35-A is the original standing order, approved by Stephen
18 Belton, M.D., and dated August 22, 2016; Exhibit 35-B is an version of the standing order updated
19 by Dr. Belton on November 20, 2017; Exhibit 35-C is the standing order approved by Teresa Tan,
20 M.D, dated September 25, 2020; Exhibit 35-D is the standing order approved by both Dr. Tan and
21 Sam Young, M.D., dated January 25, 2021; Exhibit 35-E is the standing order approved by
22 RealOptions' current medical director, Mary Davenport, M.D., dated April 6, 2023. RealOptions
23 endorses all of the statements and representations therein on its good faith belief, in reliance on expert
24 medical opinion, that they are true and not misleading.

25 18. Attached to the Appendix of Evidence, Vol. II, as **Exhibit 36** is a true and correct copy
26 of the portions of RealOptions' "Policy and Procedure Manual" relating to abortion pill reversal.
27 Exhibit 36-A is the version dated October 1, 2020; Exhibit 36-B is the current version dated June 27,
28 2022; Exhibit 36-C are additional instructions dated November 12, 2024. Within Exhibit 36-B there

are two sets of instructions. The first line treatment is for the woman to come into a RealOptions clinic to receive progesterone injections from a nurse and then subsequently take progesterone capsules orally at home. The second line treatment is for the woman to only take progesterone capsules orally. RealOptions endorses all of the statements and representations therein on its good faith belief, in reliance on expert medical opinion, that they are true and not misleading.

19. Attached to the Appendix of Evidence, Vol. II, as **Exhibit 37** is a true and correct printout of an excel sheet that I created by reviewing patient charts to show the results of all women who received abortion pill reversal treatment at RealOptions, as of December 19, 2025.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on January 18, 2026, in San Jose, California.

Signed by:

Tasha Keirns

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Tasha Keirns, RN, BSN
CEO, RealOptions, Inc.