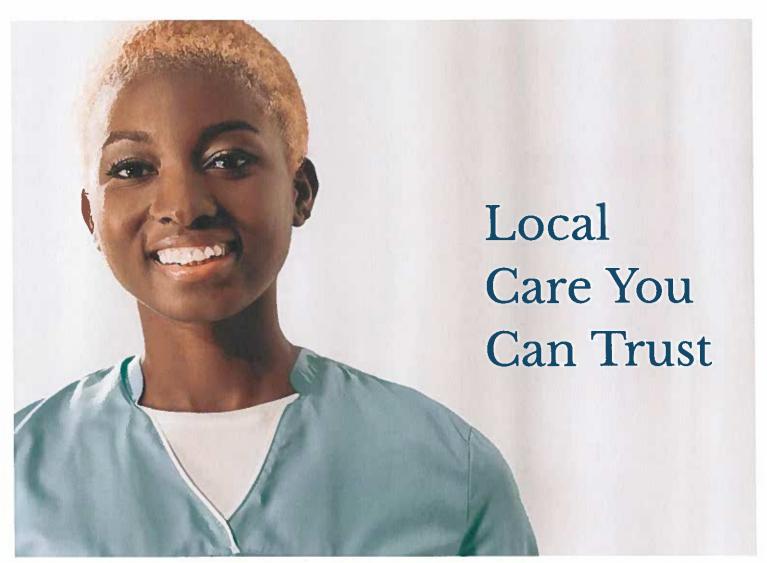
EXHIBIT A



HOME SERVICES PREGNANCY ABORTION SEXUAL HEALTH ABOUT GET CARE



At Your Options Medical, We Put You First Here

Your Options Medical, with four locations in Fall River, Revere, Hyannis, and Brookline, serves the

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greater Boston area by offering holistic services and support during and after an unexpected pregnancy or abortion.

Our services are provided at no cost. We believe each person has the right to get information from a resource that will not profit from their reproductive health choices.

GET CARE

TEXT: 508-251-9022

The Pregnancy and Abortion Answers You Need

I think I may be pregnant or I need to confirm my pregnancy and how far along I am. I want to learn more about the abortion pill or abortion clinic procedures, side effects, and what to expect. I am experiencing an unexpected pregnancy and looking for free resources, support, or aid

LEARN MORE

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Real Reviews From Strong Women Like You









This is a safe and confidential pla

Great services, and at no cost. I e

The nurse was patient and kind and

https://www.youroptionsma.org/

Page 2 of 6

Free Women's Health Clinic in Brookline, Fall River, Hyannis, & Revere, MA | Your Options Medical

8/19/24, 12:00 PM

get a hand up with assistance in n informed decisions and ongoi support and counsel. EXHIBIT A
got a pregnancy test, plus ar
ultrasound, and they were ve
informative and caring.

explained everything in detail. There was no judgment involved. Thank you!

Your Health Matters.

Take the time you need to get answers on pregnancy, abortion, sexual health, and more.

Read the blog or follow us to stay up to date!

WOMEN'S HEALTH BLOG

Why Choose Your Options Medical

Is Ordering The Abortion Pill Safe?

Why Ultrasounds Matter

Local Aid and Free Resources

When Did I Conceive?

I Want to Talk About My Abortion





What Are the Most Common STDs and Their Is Plan B
Considered the
Abortion Pill?

How Soon Can Home Pregnancy Tests Accurately Free Women's Health Clinic in Brookline, Fall River, Hyannis, & Revere, MA | Your Options Medical

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Considering Abortion?

Get the Answers You Need Before You Decide

- Is there anyone not eligible for the abortion pill?
- How late can you take pills? How early?
- Is an ultrasound needed if I had a home pregnancy test?
- If I have an IUD, do I need to get it removed?
- Should I get tested for an STD or STI first?
- What do I do if it doesn't work?

Questions? Book an appointment today.

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Hyannis Center

Revere Center

Fall River Center

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GET CARE

Brookline Center

1180 Beacon Street STE 5D Brookline, MA 02446

Hours

Mon & Thurs: 10 am - 5 pm Call: 508-251-9022

Hyannic Contor

Fall River Center

25 N Main St Fall River, MA 02720

Hours

Tues: 10 am - 6 pm Thurs: 10 am - 5 pm Call: 508-252-8687

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TEXT: 508-251-9022

https://www.youroptionsma.org/ Page 5 of 6

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Free Women's Health Clinic in Brookline, Fall River, Hyannis, & Revere, MA | Your Options Medical

8/19/24, 12:00 PM

EXHIBIT A

724 Main Street Unit H Hyannis, MA 02601

103 Broadway Revere, MA 02151

Hours

Mon-Fri: TBD Call: TBD

Hours

Mon & Thurs: 9:30 am - 6 pm Tues: 10 am - 2 pm Call: 781-218-2915

All our services are provided at no cost to our clients. The education on this website is intended for general education purposes only and should not be relied upon as a substitute for professional counseling, medical or prenatal care. Please note, our center does not perform not refer for abortion services. We provide information on abortion side effects, what to expect, and more so you can make a fully informed choice. Contact us to learn more

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EXHIBIT B



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PRESS RELEASE

AG Healey Warns Patients About Crisis Pregnancy Centers

Advisory Informs People That Crisis Pregnancy Centers Do Not Offer Abortion or Comprehensive Reproductive Care

FOR IMMEDIATE RELEASE: 7/06/2022

Office of Attorney General Maura Healey

BOSTON — In the wake of the U.S. Supreme Court decision overturning Roe v. Wade, Attorney General Maura Healey today issued a consumer advisory warning patients seeking reproductive health services about the limited and potentially misleading nature of the services provided by crisis pregnancy centers. In Massachusetts, abortion remains legal, and people have a right to access comprehensive reproductive healthcare.

In today's multilingual advisory (/info-details/crisis-pregnancy-centers-cpcs), AG Healey urges patients to do their research before making an appointment to access abortion or reproductive healthcare, especially if they are seeking information about abortion care. Crisis Pregnancy Centers do not provide comprehensive reproductive healthcare, rather they are organizations that seek to prevent people from accessing abortion care. If you are pregnant and looking to understand your abortion options, you should consult with a licensed reproductive healthcare provider.

"While crisis pregnancy centers claim to offer reproductive healthcare services, their goal is to prevent people from accessing abortion and contraception," said AG Healey. "In Massachusetts, you have the right to a safe and legal abortion. We want to ensure that patients can protect themselves from deceptive and coercive tactics when seeking the care they need."

"In Massachusetts, so-called crisis pregnancy centers outnumber legitimate abortion care providers 3 to 1," said Senator Elizabeth Warren. "I strongly commend Attorney General Healey and community partners for their efforts to crack down on these deceptive organizations to protect residents and women coming to Massachusetts seeking abortion care. I'll keep fighting in Congress to stop these harmful practices nationwide."

"People facing an unintended pregnancy deserve compassionate, medically-accurate care," said Rebecca Hart Holder, Executive Director of Reproductive Equity Now, "Crisis pregnancy centers, or fake clinics, are dangerous facilities that use deceptive advertising to deceive pregnant people into believing that they provide abortion care, when in reality, many do not even have doctors on staff to discuss the full range of health care options with clients. These facilities are often funded by antiabortion organizations and have one goal in mind: to stop pregnant people from accessing abortion care. That's why clear and accurate information on the dangers of CPCs is so important. In a post-Roe America, we need to ensure people know how to navigate legitimate, unbiased reproductive health care."

The advisory warns that while Crisis Pregnancy Centers may appear to be reproductive health care clinics, they do not provide abortion care or abortion referrals, contraception, or other reproductive health care, despite what they may advertise. Importantly, people who are pregnant or believe they may be pregnant should know that:

- Most Crisis Pregnancy Centers are not I censed medical facilities or staffed by licensed doctors or nurses.
- Some Crisis Pregnancy Centers offer ultrasounds performed by unlicensed personnel, which may lead to inaccurate or misleading results about a pregnancy.
- Crisis Pregnancy Centers staffed by unlicensed personnel are not required to keep your medical records private.
- Unlicensed Crisis Pregnancy Centers are not required to follow codes of ethics or standards of care that govern healthcare

MEDIA CON

Jillian Fer

Phone (617) 727-25

Online

Jillian.Fenni (mailto:Jillian.Fo

8/19/24, 12:05 PM

EXHIBIT C

professions.

- Crisis Pregnancy Centers often provide inaccurate and misleading information about abortion and the medical and mental health effects of abortion.
- Crisis Pregnancy Centers often mislead people about how far they are into their pregnancy.
- Crisis Pregnancy Centers often try to delay scheduling appointments to push people beyond the point at which they can
 obtain an abortion.
- Many Crisis Pregnancy Centers are located near clinics that provide abortion and use similar sounding names. When you
 arrive for your appointment, make sure you are in the right place.

The AG's advisory (info details/cross-pregnancy-centers-cpcs) offers advice for patients seeking reproductive health services, including looking at online reviews before making an appointment, asking whether the center is licensed, and looking out for warning signs. Warning signs include that the center:

- Is listed as a pregnancy resource center, pregnancy help center, pregnancy care center, or women's resource center on websites such as: https://helpinyourarea.com/massachusetts/.https://helpinyourarea.com/massachusetts/).
- Advertises free pregnancy tests, abortion counseling, pre-abortion screenings, abortion education, but do not provide abortion or help you access care elsewhere.
- Attempts to delay your appointment.
- Uses tactics to try to pressure you into continuing a pregnancy, for example, by providing baby clothes or a plastic fetus.

For help finding a licensed reproductive healthcare provider, talk to your doctor or check this list: https://abortioncarenewengland.org/providers (https://abortioncarenewengland.org/providers).

The Attorney General's Office is committed to securing the civil rights of all people in Massachusetts or traveling to Massachusetts to access healthcare. If you have concerns about your experience with a crisis pregnancy center, file a complaint with our Civil Rights Division online (/how-to/file-a-civil-rights-complaint) or at 617-963-2917.

###

Media Contact

Jillian Fennimore

Phone

(617) 727-2543 (tel:6177272543)

Online

Jillian.Fennimore@mass.gov(mailto;Itlian.Fennimore@mass.gov)



Office of the Attorney General

Attorney General Maura Healey is the chief lawyer and law enforcement officer of the Commonwealth of Massachusetts.

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EXHIBIT C



All Topics (/topics/massachusetts-topics) Site Policies (/massgov-site-policies) Public Records Requests (/topics/public-records-requests)

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EXHIBIT D





Case 1:24-cv-12131 Document 1-3 Filed 08/19/24 Page 13 of 35 **EXHIBIT D**



EXHIBIT E

EXHIBIT E



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REPRODUCTIVE EQUITY NOW

Executive Office of Health and Human Services 1 Ashburton Place Boston, MA 02108

Massachusetts Department of Public Health 99 Chauncy Street Boston, MA 02111

Re: Complaint Regarding Your Options Medical Mobile Unit

October 17, 2023

To Whom it May Concern:

I write on behalf of Reproductive Equity Now¹ to express our concern about potentially deceptive practices Your Options Medical anti-abortion mobile unit appears to engage in and the resulting impact on pregnant people seeking care. The Your Options Medical mobile unit preparing to operate on Cape Cod advertises free pregnancy testing and ultrasounds with "immediate" pregnancy results on the mobile unit itself, yet Your Options Executive Director Teresa Larkin has stated "when we say immediate results, we usually mean preliminary findings." It is not clear from Ms. Larkin's statement what "preliminary findings" of pregnancy "results" are or how Your Options Medical obtains those findings. Pregnant people may detrimentally rely on the promise of "immediate results" to make time-sensitive medical decisions. Based on the discrepancy between the advertised services on the mobile unit and the statements of Ms. Larkin, Your Options Medical may be engaging in deceptive practices and potentially endorsing out-of-scope diagnoses by registered nurses in order to provide the advertised immediate results.

The advertisement on the mobile unit and Ms. Larkin's statements raise two important issues. First, Ms. Larkin's statements suggest that the Your Options Medical mobile unit may be falsely advertising "immediate results." Second, if the Your Options Medical mobile unit is offering "immediate results" following an ultrasound, we have serious concerns that clinicians may be operating beyond their scope of practice.

Your Options Medical operates three clinic locations in Brookline, Fall River, and Revere.³ It has also operated a mobile unit in western Massachusetts and has recently moved to launch the

¹ Reproductive Equity Now works to make equitable access to the full spectrum of reproductive health care a reality for all people regardless of their gender, age, race, ethnicity, zip code, income, immigration status, disability, or sexual orientation. Advancing reproductive justice and eliminating barriers to safe, legal abortion care are central to our mission.

² Sophie Mann-Shafir, Mobile Anti-Abortion mobile unit Arrives in Wellfleet, The Provincetown Indep. (Aug. 16, 2023), https://provincetownindependent.org/featured/2023/08/16/mobile-anti-abortion-mobile unit-arrives-in-wellfleet/.

³ YOUR OPTIONS MEDICAL, https://youroptionsma.org/ (last visited Oct. 13, 2023).

EXHIBIT F

mobile unit on Cape Cod.⁴ Your Options Medical's Revere clinic location and Southbridge mobile unit are licensed by DPH. Your Options Medical is an anti-abortion center (AAC), commonly referred to as "crisis pregnancy centers" or "CPCs", which works to dissuade pregnant people from obtaining abortions. AACs are nonprofit organizations that often present themselves as medical clinics offering pregnancy-related care while actually seeking to prevent people from obtaining abortion care.⁵ In Massachusetts, AACs outnumber legitimate abortion clinics by more than double.⁶

Based on recent press reports, Your Options Medical appears to engage in intentionally misleading and deceptive practices about the services offered to people seeking abortion and pregnancy-related care by advertising "free pregnancy testing and ultrasounds" with "immediate results" on the mobile unit itself while stating that, in fact, the results are "preliminary findings." It is against nursing standards of conduct for nurses to "engage in false, deceptive, or misleading advertising related to the practice of nursing." Additionally, it is "against the public interest" for advertising of the practice of medicine to be "false, deceptive, or misleading." The mobile unit advertises "free pregnancy tests and ultrasounds" with "immediate results" but Ms. Larkin has stated this is not actually how the services are offered. Ms. Larkin has claimed that the ultrasounds would be read by a registered obstetrician or radiologist but has no plans for the doctor to be onsite to immediately review ultrasounds. In Instead, Ms. Larkin reports the ultrasound images taken in the mobile mobile unit will be sent digitally to a physician, and she estimates results to be reviewed by the physician within 24 to 48 hours. A 24- to 48-hour delay in results is not "immediate results" and raises concerns of deceptive advertising in violation of Board of Registration in Medicine and Board of Registration in Nursing regulations.

We have further concerns regarding Your Options Medical's claim to be able to provide appropriate and in scope diagnostic ultrasound services, if they seek to act on their claim of providing "immediate results." Without a physician available to immediately interpret an ultrasound and provide "immediate results," we are concerned that registered nurses could be operating outside of their scope of practice by diagnosing ultrasounds immediately. Any such

⁴ Sophie Mann-Shafir, *Mobile Anti-Abortion Center Is Coming to the Cape*, THE PROVINCETOWN INDEP. (Aug. 2, 2023), https://provincetownindependent.org/local-journalism-project/next-generation/2023/08/02/mobile-anti-abortion-center-is-coming-to-the-cape/.

⁵ Frequently, AACs are religiously affiliated and do not provide abortion or contraception or make referrals for abortion or contraceptive care, though some such as Your Options Medical, do provide pregnancy tests, STI testing, and ultrasounds. See Melissa N Montoya et al, The Problems with Crisis Pregnancy Centers: Reviewing the Literature and Identifying New Directions for Future Research, INT'L JOURNAL OF WOMEN'S HEALTH (June 8, 2022), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9189146/.

⁶ REPRODUCTIVE EQUITY Now, New England Abortion Care Guide, https://reproequitynow.org/abortioncareguide (last visited Oct. 4, 2023).

⁷ Mann-Shafir, supra note 1.

^{8 244} Mass. Code Regs. 9.03.

^{9 243} Mass. Code Regs. 2.0.

¹⁰ Mann-Shafir supra note 1.

¹¹ ld.

¹² ld.

¹³ 243 Mass. Code Regs. 2.07; 244 Mass. Code Regs. 9.03.

EXHIBIT F

action would be unlawful. Registered nurses are not permitted to diagnose; only licensed doctors or Advanced Practice Registered Nurses are permitted to do so.¹⁴

Out-of-scope practice is not only unlawful, but also may result in a misdiagnosis. This can lead to delayed care and life-threatening complications, as is the case in a lawsuit filed against a licensed AAC in Worcester, in which a woman alleges that a registered nurse at the center acted out of their scope of practice to diagnose her ultrasound and misdiagnosed her ectopic pregnancy. This misdiagnosis resulted in invasive emergency surgery to stop her hemorrhaging and the removal of a fallopian tube. While Your Options Medical mobile unit has yet to begin operating on Cape Cod, we are alarmed by reporting indicating their plan to make only registered nurses and volunteers available at appointments, while simultaneously advertising "immediate results," which could set up a scenario for out-of-scope practice and patient endangerment.

We are alarmed by the comments of Ms. Larkin which suggest Your Options Medical engages in deceptive and intentionally misleading practices and creates a basis for an investigation as to whether or not out of scope medical practice is occuring at these licensed clinics. We urge the Division of Health Care Facility Licensure and Certification to investigate the Your Options Medical licensed clinics to ensure patient safety and that the standards set forth by the Board of Registration in Nursing and the Board of Registration in Medicine have been adhered to.

Sincerely,

Rebecca Hart Holder

President

Reproductive Equity Now

Rebeas Hart Holer

CC: Executive Office of Health and Human Services Secretary Kate Walsh
Massachusetts Department of Public Health Commissioner Dr. Robert Goldstein
Board of Registration in Medicine
Board of Registration in Nursing
Division of Health Care Facility Licensure and Certification

¹⁴ 243 Mass. Code Regs. 2.01; 244 Mass. Code Regs. 3.02; 244 Mass. Code Regs. 10.0.

¹⁵ Ivy Scott, Crisis pregnancy center accused of failing to care for Worcester woman who was later forced to have emergency abortion, Boston Globe (June 22, 2023, 2:30 PM),

https://www.bostonglobe.com/2023/06/22/metro/clearway-clinic-lawsuit/.

¹⁶ ld.

¹⁷ Mann-Shafir supra note 1.

ortion Mobile Unit — Reproductive Equity Now Reproductive Equity Now Sends Letter to Mass. DPH, EOHHS Cal



About State Work Legislative Agendas Electoral Work f (O) Donate Resources Media Get involved

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To Mass. DPH, EOHHS Calling For Investigation Of 'Your Options Medical' Anti-Abortion Mobile Unit

New anti-abortion center van planned to launch on Cape Cod to offer so-called 'immediate' ultrasound results

BOSTON, Mass. (October 18, 2023) - Reproductive Equity Now, a leading voice for abortion advocacy across New England, today sent a letter to the Massachusetts Department of Public Health and the Massachusetts Executive Office of Health and Human Services calling for an investigation into Your Options Medical licensed clinics, and specifically, the group's new mobile unit that is preparing to operate on Cape Cod. The letter draws attention to the mobile unit's potential deceptive advertising practices, and calls for an investigation into whether or not out-of-scope medical care is occuring at these licensed clinics.

The Your Options Medical mobile unit advertises free pregnancy testing and ultrasounds with "immediate" pregnancy results. However, Your Options Medical Executive Director Teresa Larkin stated to the *Provincetown Independent* that the mobile unit actually offers "preliminary results" and that ultrasound images taken from the van will be sent digitally to a physician, which can take 24 to 48 hours to be read and diagnosed—not immediate results. The letter raises concerns of deceptive advertising, especially for people who may

EXHIBIT F

detrimentally rely on the promise of "immediate results" to make time-sensitive medical decisions. If the mobile unit seeks to act on its claim of providing "immediate results," without a physician or advanced practice registered nurse on-site to immediately diagnose an ultrasound, as the Independent reported, Reproductive Equity Now is calling for an investigation into whether registered nurses could be operating outside of their scope of practice by diagnosing ultrasounds on-site.

"Out-of-scope practice is not only unlawful, but also may result in a misdiagnosis. This can lead to delayed care and life-threatening complications, as is the case in a lawsuit filed against a licensed anti-abortion center in Worcester, in which a woman alleges that a registered nurse at the center acted out of their scope of practice to diagnose her ultrasound and misdiagnosed her ectopic pregnancy," wrote Rebecca Hart Holder, President of Reproductive Equity Now, in the letter to DPH and HHS. "While Your Options Medical mobile unit has yet to begin operating on Cape Cod, we are alarmed by reporting indicating their plan to make only registered nurses and volunteers available at appointments, while simultaneously advertising 'immediate results,' which could set up a scenario for out-of-scope practice and patient endangerment."

Read Reproductive Equity Now's full letter to the Department of Public Health and Executive Office of Health and Human Services HERE.

This summer, a Worcester woman filed a class action lawsuit against Clearway Clinic, an anti-abortion center, after she received incorrect ultrasound results from a registered nurse allegedly practicing out of scope. The woman, who was not seen by a Clearway physician despite being given paperwork upon discharge that her care was provided by a medical doctor, was told at Clearway that her pregnancy was viable and in-utero. A month later, the woman was transported to UMass Memorial Medical Center where her pregnancy was diagnosed as ectopic. Because of the delay in accessing legitimate reproductive health care, the woman had to undergo life-saving surgery to stop her hemorrhaging that resulted in the loss of her fallopian tube.

Today's letter comes after Massachusetts Commissioner of Public Health Dr. Robert Goldstein wrote a letter to the Boston Globe encouraging those who have concerns about the "qualifications or safety of care delivered by a nurse or physician" to file a formal complaint to initiate an investigation. People who have had a negative experience with

anti-abortion centers can call Reproductive Equity Now's Abortion Legal Hotline at 833-309-6301 to report their case and be referred to pro bono attorneys. Patients can also file a report with the Attorney General Office's Civil Rights Division online or at 617-963-2917.

For patients in need of legitimate abortion, reproductive, and sexual health care services, Reproductive Equity Now's New England Abortion Care Guide identifies your nearest reproductive health care clinic and flags dangerous anti-abortion centers to avoid in your area. Health Imperatives has begun offering medication abortion at seven locations across the Cape and Islands.

BACKGROUND:

- Anti-abortion centers, also known as "crisis pregnancy centers," are not legitimate health care providers. According to the American College of Obstetricians and Gynecologists, anti-abortion centers present themselves to be pregnancy health care providers but "actually aim to dissuade people from accessing certain types of reproductive health care, including abortion care and even contraceptive options." The Massachusetts Attorney General's office notes that "CPCs do NOT provide comprehensive reproductive healthcare. CPCs are organizations that seek to prevent people from accessing abortion care."
- Anti-abortion centers more than double the number of legitimate abortion clinics in Massachusetts. Reproductive Equity Now's New England Abortion Care Guide identifies 19 abortion clinics and 39 anti-abortion centers in the Bay State. Antiabortion centers often position themselves directly next to legitimate clinics to confuse patients.
- Massachusetts has allocated major funding to educate residents on the harms of anti-abortion centers. In February of 2023, Governor Maura Healy approved \$1 million for a public education campaign to illuminate the dangers of anti-abortion centers for Bay Staters.

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WCVB | Massachusetts lawmakers eye cracking down on personal data security

Worcester Telegram & Gazette | Mass. weighs importance, cost of funding child care and early childhood education



Healey-Driscoll Administration Launches First-in-the-Nation Public ...ucation Campaign on the Dangers of Anti-Abortion Centers | Mass.gov

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Search Mass.gov

1/1 > Executive Office of Health and Human Services (/orgs/executive-office-of-health-and-human-services)

PRESS RELEASE

Healey-Driscoll Administration Launches First-in-the-Nation Education Campaign on the Dangers of Anti-Abortion Cente

Campaign ads warn of disinformation spread by so-called "crisis pregnancy centers" throughout Massachusetts

FOR IMMEDIATE RELEASE: 6/10/2024

Executive Office of Health and Human Services

Department of Public Health

Bureau of Community Health and Prevention

Online Sophie.f.har (maito:Sophie

MEDIA CON

Sophie H

Manager

Phone 617-352-299



BROOKLINE — The Healey-Driscoll Administration today launched a first-in-the-nation public education campaign highlighting the dangers and potential harm of anti-abortion centers, also called "crisis pregnancy centers." Anti-abortion centers often look like medical facilities and purport to offer the full spectrum of reproductive health care while, in reality, they often mislead people about their options if they are pregnant and dissuade them from accessing abortions.

The campaign ads, which began running June 10 across Massachusetts in both English and Spanish, amplify how anti-abortion

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Healey-Driscoll Administration Launches First-in-the-Nation Public ...ucation Campaign on the Dangers of Anti-Abortion Centers | Mass.gov

8/19/24, 12:25 PM

centers provide misinformation about abortion services to prevent people from making an informed choice about their care. The campaign is designed to help people understand their full range of options, directing them to mass.gov/GetTrustedCare/GetTrustedCare/ with information about how to recognize anti-abortion centers and where to access unbiased, full-spectrum reproductive health care in Massachusetts.

"In Massachusetts, we are committed to protecting and expanding access to safe and legal abortion," said Governor Maura Healey. "That includes protecting patients from the deceptive and dangerous tactics that anti-abortion centers often use to stop people from accessing comprehensive reproductive services. This campaign is an important way to provide accurate information so residents can make informed decisions about reproductive care that are right for them."

"The troubling practices of anti-abortion centers serve to undermine the trust that people should have in our health care system," said Lieutenant Governor Kim Driscoll. "Education and accurate information can help counter the misinformation and unethical tactics these centers use to prey on people at a particularly vulnerable time."

This public education campaign, which will appear on social media platforms, billboards, radio, and transit, was funded through a \$1 million investment that the Massachusetts legislature passed as part of its FY2023 supplemental budget. The campaign was created by the Department of Public Health (DPH) in collaboration with the Reproductive Equity Now Foundation, a nonprofit focused on educating the public about equitable access to reproductive health care.

Visit the campaign's digital toolkit (/info-details/anti-abortion-center-awareness-campaign-social-media-toolkit-english) to view shareable ads, including a :15 and :30 second video spot.

In Massachusetts, anti-abortion centers outnumber comprehensive reproductive health clinics by more than two to one. Anti-abortion centers use deceptive practices to attract patients: they may be located near reproductive health clinics; they create websites that appear in online searches for abortion clinics; and they advertise online and in print media in ways that aim to appeal to those who are considering abortion. Anti-abortion centers often spread disinformation about abortion care and fail to counsel patients about all their options, delaying or dissuading people from accessing abortion.

Many anti-abortion centers do not have licensed medical professionals on-site to deliver services, oversee care, or provide information and answers to clients. In addition, most facilities are not bound by federal patient privacy protections, which could leave patients vulnerable (https://prismreports.org/2022/08/24/anti-abortion-centers-surveilling-criminalizing-clients/) to the distribution of their personal health data.

"Pregnant people who want to understand their options deserve accurate information," said Attorney General Andrea Joy Campbell. "We applied the Healey-Driscoll Administration and DPH for helping to ensure that patients can protect themselves from anti-abortion centers' deceptive efforts, and I along with our newly-formed Reproductive Justice Unit look forward to working in partnership with them to ensure residents have access to reproductive healthcare."

"Anti-abortion centers exist to block access to full service, evidence-based, high-quality care offered by licensed providers. That is unacceptable," said Secretary of Health and Human Services Kate Walsh. "The marketing campaign is designed to protect people, by urging them to seek safe and unbiased reproductive health care from caregivers who can provide the right care—the best care—free from coercion or misinformation."

"Every day, individuals in the Commonwealth walk into anti-abortion centers unaware that these facilities are masquerading as comprehensive medical providers and pose a significant risk to the health and well-being of those seeking help, support, and options," said Robbie Goldstein, MD, PhD, Commissioner of the Department of Public Health. "As a physician, I find this kind of deception and misrepresentation unconscionable, and as Commissioner, I feel compelled to push back as hard as possible against these shameful practices and blatant misinformation."

"Information is power, and today, Massachusetts is putting power in the hands of our communities by alerting them to the dangers of deceptive anti-abortion centers," said Rebecca Hart Holder, President of the Reproductive Equity Now Foundation. "We're so proud that the Healey-Driscoll Administration is addressing this public health threat head-on, and we have been honored to work with the Massachusetts Department of Public Health on the creation of this first-in-the-nation public education campaign. Together, we can combat anti-abortion centers' predatory practices and ensure every person in Massachusetts has access to the health care they want and need, without deception or delay."

In January, DPH issued guidance (/news/maintaining-integrity-accessibility-and-transparency-in-reproductive-care) to combat anti-abortion centers' deceptive practices. The Department sent a memo reminding licensed providers, clinics, and hospitals of their obligations under state law and as a condition of licensure. These obligations include "providing patients accurate and complete information for informed decision-making, accurate portrayal and advertising of clinical services, and licensees practicing within their scope of practice and their license."

Individuals who have had a negative experience with an anti-abortion center can file a Civil Rights

Complaint (/how-to/file-a-civil-rights-complaint) with the Attorney General's Office. Those who have concerns about staff who are – or

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Healey-Driscoll Administration Launches First-in-the-Nation Public ... ucation Campaign on the Dangers of Anti-Abortion Centers | Mass.gov

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who claim to be - licensed providers can file complaints

 $\textbf{Medicine} \ \textit{(I'info-details/submit-a-complaint-against-a-physician)} \ for \ physician \ concerns \ or \ the \ \textbf{Bureau} \ of \ \textbf{Health Professions}$

Licensure (/info-details/file-a-complaint-against-a-health-care-professional-or-facility) for concerns related to nurses, physician assistants, or other health care professionals. Patients may also reach out to Abortion Legal

Hotline (https://reproequitynow.org/hotline#:::text=For%20hetp%20navigating%20the%20judicial,(617)%20616%2D1636.), a free and confidential resource, created by the Reproductive Equity Now Foundation, the Massachusetts Attorney General's Office, the Women's Bar Foundation, and the ACLU of Massachusetts to connect people with pro bono legal advice about their rights to access abortion care.

The Reproductive Equity Now Foundation provides a Massachusetts Abortion Care

Guide (https://reproequitynow.org/find-a-provider-massachusetts) that offers information about safe, trusted abortion care in the state. In addition, learn about abortion protections at mass.gov/AbortionAccess (/AbortionAccess).

Statements of Support

Senator Edward J. Markey (D-Mass.)

"In the wake of the Dobbs decision that stripped Americans of their constitutional right to abortion, it is more important than ever that pregnant people are aware of the dangers of anti-abortion centers that mislead and misinform patients, collect and share their most sensitive health data, and dissuade them from making the medical decisions that are right for them. I am proud that Massachusetts is leading the nation in ensuring pregnant people and their families have access to medically accurate information and comprehensive reproductive health care."

Democratic Whip Katherine Clark (MA-5)

"Right-wing extremists use anti-abortion centers to fure in women, spread disinformation, and withhold critical health care. It's all part of the same plot to undermine reproductive freedom in America and advance an ideology of control. People deserve to know the truth about these fake clinics, and I'm grateful to the Healey-Driscoll Administration for leading the way. Together, we will stop MAGA Republicans' anti-freedom agenda and protect every Bay Stater's right to make their own health care decisions."

Congressman Jake Auchincloss (MA-4)

"Reproductive freedom is under attack in 2024. The deceptive tactics used by these anti-abortion centers are another front in that fight. These clinics present a public health risk. Women have a right to make healthcare decisions with objective information, free from an agenda."

Congresswoman Lori Trahan (MA-3)

"Massachusetts has been a national leader in the fight to protect women's reproductive rights, and today's announcement by Governor Healey, Lieutenant Governor Driscoll, and Secretary Walsh is proof that we will continue to stand up for women's freedom to make their own health care decisions. We will never stand by while extreme anti-abortion centers and politicians undermine the health and safety of women and families."

House Speaker Ronald J. Mariano (D-Quincy)

"The Legislature is proud to have acted to codify and expand access to women's reproductive health care in recent years. including allocating money for this important awareness campaign. At a time when other states continue to restrict access to abortion, I thank the Healey-Driscoll Administration for their efforts in creating this campaign, and for protecting a woman's right to choose."

Senate President Karen E. Spilka (D-Ashland)

"In Massachusetts we stand firmly for reproductive rights, which includes the right to truthful information when seeking reproductive healthcare. The Senate was proud to invest \$1 million into this initiative to proactively support individuals who are seeking an abortion with getting the honest and fact-based healthcare they deserve. I'm grateful for the Healey-Driscoll Administration's work to roll this out and I look forward to seeing the campaign get started."

Sheila Ramirez, Director of Public Affairs, Planned Parenthood of Massachusetts

"We are grateful to Governor Healey, Secretary Walsh, and Commissioner Goldstein for championing this effort to get patients the information they need to make safe and informed decisions about their reproductive health. This public awareness campaign is important to get people full and accurate information about their reproductive health care options, and to disrupt the lies and harm perpetuated by anti-abortion centers. Too often our providers at PPLM see patients who mistakenly went to a nearby crisis pregnancy center and report being put through counseling they didn't want, have received inaccurate ultrasound readings, and been given false and fearmongering information about abortion. It's disorienting and terrifying for patients

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realizing they've been lied to, and it makes it harder on health care providers to build trust with patients in the care they provide and in the health system as a whole."

Julia Kehoe, President and CEO, Health Imperatives

"We are grateful to the Healey-Driscoll Administration and Reproductive Equity Now for their unwavering commitment to protecting the rights, health, and economic security of women and girls in Massachusetts. Health Imperatives' comprehensive services are available to anyone regardless of insurance status or ability to pay, but all too often patients come to us in crisis after getting misleading or incorrect information from a 'crisis pregnancy center,' This first in the nation campaign will ensure that people know where to get the health care they need and deserve."

Kristie Monast, President and CEO, HealthQ

"HealthQ is grateful to Governor Healey, Secretary Walsh, Commissioner Goldstein, and Reproductive Equity Now for their commitment and efforts to ensure every person seeking an abortion in Massachusetts is able to find the care they want and holding anti-abortion centers accountable for their deceptive practices. Anti-abortion centers are trust eroders in the health care system. At HealthQ we spend a lot of time correcting misinformation that patients who've been seen at anti abortion centers come in with and explaining why there is a discrepancy. These patients have had their trust in the healthcare system strongly disturbed and it's very hard for them to understand and rebuild it. There is no place for facilities whose goal is to mislead patients in healthcare. Earning trust from patients is a privilege, At HealthQ we value that opportunity, treasure the experience and are grateful to our patients and community who give it."

Fredie Kay, Founder and President, Massachusetts Women's History Center

"We are locked in a battle against misleading marketing and misinformation. These pregnancy centers have hidden agendas and prioritize their objectives over the wishes of unsuspecting and potentially vulnerable pregnant people. The Massachusetts Women's History Center thanks Governor Maura Healey, Lt. Governor Kim Driscoll, Secretary Kate Walsh and Commissioner Robbie Goldstein for calling out these organizations and spreading the word that such centers exist - in Massachusetts and throughout the country. The Massachusetts Women's History Center is honored to stand with the Healey-Driscoll Administration, and is grateful to have a Governor who understands the importance of increasing awareness of their existence so that pregnant people are not taken advantage of for the sake of someone else's agenda."

Yuki Davis, Executive Director, Eastern Massachusetts Abortion Fund

"Anti-Abortion Centers, or Crisis Pregnancy Centers, can be detrimental to abortion seekers across the country trying to access safe, legal abortion care. At the EMA fund, we are committed to reducing social and economic barriers to abortion care and bodily autonomy, and to make abortion accessible to anyone who needs one."

Diana Namumbejja Abwoye, Board President, Our Bodles Ourselves

"Despite enormous progress in making medication abortion available to those in ALL 52 states, regardless of legal restrictions now in place, many do not know of this option and the ease with which one can obtain information and help via organizations like PLAN C. Similarly, many do not know of the misleading messages and problematic role played by 'crisis pregnancy centers' created by anti-abortion organizations. We are so pleased that the Healey-Driscoll Administration will be using social media and other means to help the public gain access to accurate information to help achieve their reproductive health goals."

kimika ross and feyla mcnamara, Co-Executive Directors, Tides for Reproductive Freedom

"Tides for Reproductive Freedom is encouraged by the initiative taken by the state of Massachusetts to combat the misinformation and dangerous medication administered by Crisis Pregnancy Centers (CPCs). In our recent Community Access Scan respondents ranked CPCs as the 3rd most trusted source of information regarding abortions. While in the field we spoke with community members aligned with the need for safe and affordable access to abortion who directed us to their local CPCs (typically set up in low-income communities and communities of color), citing them as allies in the work we do. This speaks to what we have said since our founding- CPCs are predators in our communities, spreading confusion and building trust where others have failed. This is a big step to invest in our people and demonstrate real care about how we are impacted by these harmful and irresponsible organizations."

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EXHIBIT G

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Bureau of Community Health and Prevention

BCHAP oversees a wide range of prevention programs that advocate for the health and safety of all people in Massachusetts.

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NEWS > POLITICS

Mass. officials launch information campaign warning against anti-abortion centers









Dr. Robbie Goldstein, the Massachusetts commissioner of public health, announces a new state public awareness campaign against anti-abortion centers during an event in Brookline on June 10, 2024.

Katie Lannan / GBH News



By **Katie Lannan**

June 10, 2024

A new state public awareness campaign advises Massachusetts residents to "avoid anti-abortion centers" and to seek out other sources for pregnancy information.

State officials launched the campaign outside Women's Health Services, an abortion clinic in Brookline. They said anti-abortion counseling centers, also called "crisis pregnancy centers," can use misleading tactics to dissuade people from getting abortions.

The campaign, from the state's Department of Public Health, features ads in English and Spanish. It directs people to a state website that offers guidance on recognizing anti-abortion centers and help finding abortion providers and comprehensive reproductive health care.

DPH Commissioner Robbie Goldstein said the effort "counter-punches to the vast amount of misinformation and disinformation that these centers peddle every day, deceiving people who may be frightened or confused as they find themselves at a crossroads."

"As a physician, I'm alarmed to think that right now, someone in this state is walking through the door of an anti-abortion center, unsuspecting and believing that they will get care, support and information needed to make an important health decision," Goldstein said. "As the commissioner of public health, I'm resolute about calling out this deception for what it is: a public health threat. When people are denied factual information and the freedom to make fully informed decisions about their reproductive health, it can lead to worse mental and physical outcomes."

The DPH worked with the organization Reproductive Equity Now on the campaign.

Reproductive Equity Now President Rebecca Hart Holder called anti-abortion centers "the foot soldiers of the anti-abortion movement."

"These facilities are how anti-abortion extremists operate in protected states like ours," she said.

A spending bill that Gov. Maura Healey signed in March 2023 dedicated \$1 million dollars to a public awareness campaign focused on "crisis pregnancy centers and pregnancy resource centers and the centers' lack of medical services."

Goldstein said the period of more than a year between approval of the money and the launch of the campaign gave the department a chance to "make sure we got it right" and create something "that clearly got the message across to people that they should avoid anti-abortion centers."

The funding, Goldstein said, will allow the ads to run "for many months this year." He said they'll be distributed widely across the state, "on social media, on buses, on garbage cans."

The Pregnancy Care Alliance, a coalition of nonprofit anti-abortion organizations that launched last year, called the campaign "politically motivated" and said it would negatively affect "the many women who want to parent and rely on the free assistance we provide."

"The women served by pregnancy resource centers overwhelmingly report a positive experience, yet the Healey administration and other politicians in the state are furthering their extreme abortion agenda by using a taxpayer-funded campaign to discredit our centers," the alliance, an affiliate of Massachusetts Citizens for Life, said in a statement.

The ad campaign arrives in an election year when Democrats are <u>calling attention</u> to Republican-backed limits on abortion.

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EXHIBIT H"The right for a woman to access safe and effective abortion care is vital to public health and women's empowerment, and yet one in three women live in states without access to elective abortion services," U.S. Rep. Jake Auchincloss said in Brookline Wednesday. "As women face obstacles in their right to choose, we are seeing anti-abortion practices seize an opportunity in a post-Roe America to expand their duplicitous centers and impede safe and effective abortion care."

There are around 30 anti-abortion centers in Massachusetts, officials said.



Katie Lannan



Katie Lannan covers the State House for GBH News. Feedback? Questions? Story ideas? Reach out to Katie at katie lannan@wgbh.org.

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