



DISTRICT OF COLUMBIA



TENNESSEE



VIRGINIA



October 15, 2025

Lt. Governor Dan Patrick,
Chair
Religious Liberty Commission
Office of the Associate Attorney General
U.S. Department of Justice



Re: Systematic Censorship of Pregnancy Resource Centers by Big Tech

Dear Chairman Patrick:

The American Center for Law & Justice (ACLJ) writes to commend the Administration's recognition that anti-Christian bias has become an alarming and pervasive problem, and to urge the Commission to take immediate steps to confront it.

Over the past several years, our clients, pro-life pregnancy resource centers ("PRCs"), have been subjected to targeted censorship and discrimination. Major technology platforms are restricting or banning pro-life advocacy and advertising—largely at the behest of Democrat politicians and big-abortion lobbyists.¹ At the state and local level, governments have adopted measures singling out faith-based organizations for special burdens not imposed on secular

¹ Press Release, United States Representative Suzanne Bonamici, *Maloney, Bonamici Demand that Google Stop Funding Advertising for Fake Women's Health Centers* (May 17, 2019), <https://bonamici.house.gov/media/press-releases/maloney-bonamici-demand-google-stop-funding-advertising-fake-womens-health>; Clare Duffy & Brian Fung, *Lawmakers Urge Google to Remove Misleading Results in Searches for Abortion Clinics*, CNN (June 17, 2022), <https://www.cnn.com/2022/06/17/tech/google-abortion-misleading-results-lawmakers>; Press Release, Office of the New York State Attorney General, *Attorney General James Calls on Google to Address Dangerous Amplification of Fake Pregnancy Centers* (June 29, 2022), <https://ag.ny.gov/press-release/2022/attorney-general-james-calls-google-address-dangerous-amplification-fake>.

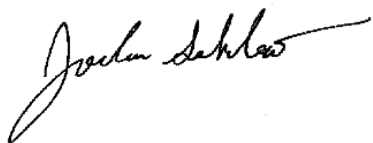
counterparts. Across the board, these actions reflect a troubling double standard aimed at silencing Christian voices in the public square and marketplace.

The Religious Liberty Commission was created precisely because these threats are no longer isolated or anecdotal—they are systemic. We therefore respectfully request that the Commission investigate instances of discrimination specifically targeting pregnancy resource centers, particularly the coordinated efforts of big-tech platforms—often at the urging of pro-abortion advocates—to censor or restrict their speech; issue public reports and recommendations to ensure accountability and transparency; provide clear guidance to federal agencies and private actors that such anti-Christian bias violates federal law and constitutional protections; and engage directly with affected PRCs, including our clients, to fully document the scope of this systemic problem.

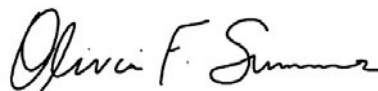
The ACLJ stands ready to assist the Commission by providing testimony, client documentation, and legal analysis of the discrimination faced by Christian organizations across the country. Attached for your review is a report from M is Good regarding ad performance data from one of our client PRCs, which demonstrate the measurable harm caused by these discriminatory practices.

We applaud the creation of this Commission as an important step forward. But action must follow. Without decisive measures, Pro-life Christian ministries will remain vulnerable to ongoing censorship, harassment, and denial of equal footing in the marketplace of ideas.

Respectfully,



Jordan Sekulow
Executive Director
American Center for Law & Justice



Olivia F. Summers
Senior Litigation Counsel
American Center for Law & Justice

Report: Google's Treatment of Pregnancy Resource Center Advertising

Overview

M is Good has been managing Google Ads and SEO for Gate Pregnancy Resource Center (“Gate PRC”) near Charlotte, NC, for the past 3-4 years. During this time, Gate PRC experienced consistent and significant restrictions on its ability to advertise, while abortion clinics advertising on the same platform face no similar limitations.

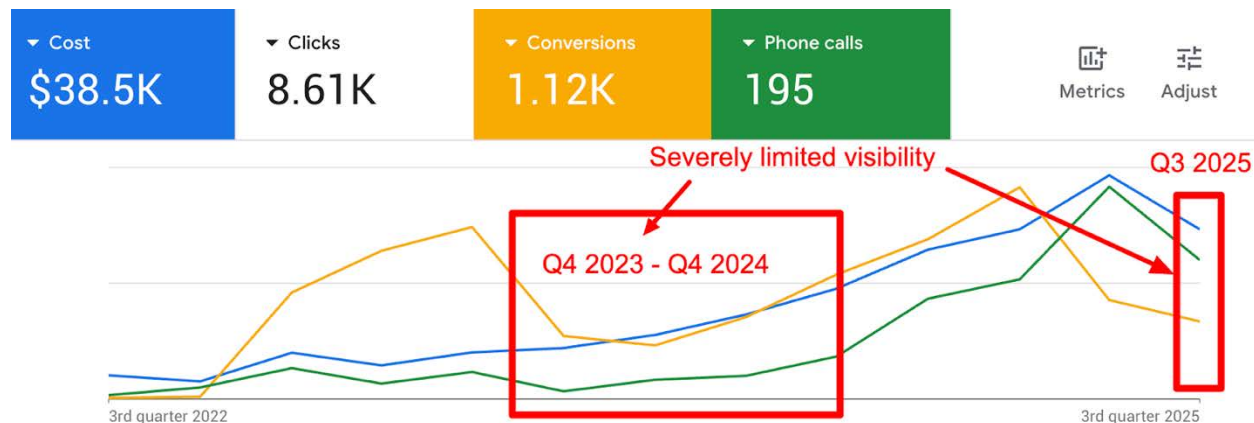
This report documents what M is Good has experienced in its efforts to advertise for Gate PRC and the impact it has had on Gate PRC’s ability to reach women seeking pregnancy-related information.

The Core Problem: Unequal Treatment

- Google and Microsoft restrict advertiser’s ability to target abortion-related keywords
- Abortion clinic competitors can target these same keywords without any restrictions

This matters because when a woman searches for abortion-related terms, she sees ads from abortion clinics but not from pregnancy resource centers that could offer her additional options and support.

What Happened with Paid Advertising



The Early Years (2022-2024)

M is Good started managing Gate PRC’s Google Ads in early 2022. Almost immediately, it ran into a major problem that had nothing to do with its advertising strategy.

Late 2022 - Google Maps Changes:

Google removed pregnancy resource centers from default Google Maps searches. Now, PRCs only appear if someone specifically searches for providers that “do not provide abortions.”

This was a huge shift. PRCs that had been getting significant visibility for free suddenly disappeared from map results. They had to start paying for ads just to maintain the same level of visibility they had been getting organically.

2023-2024 - The Long Struggle:

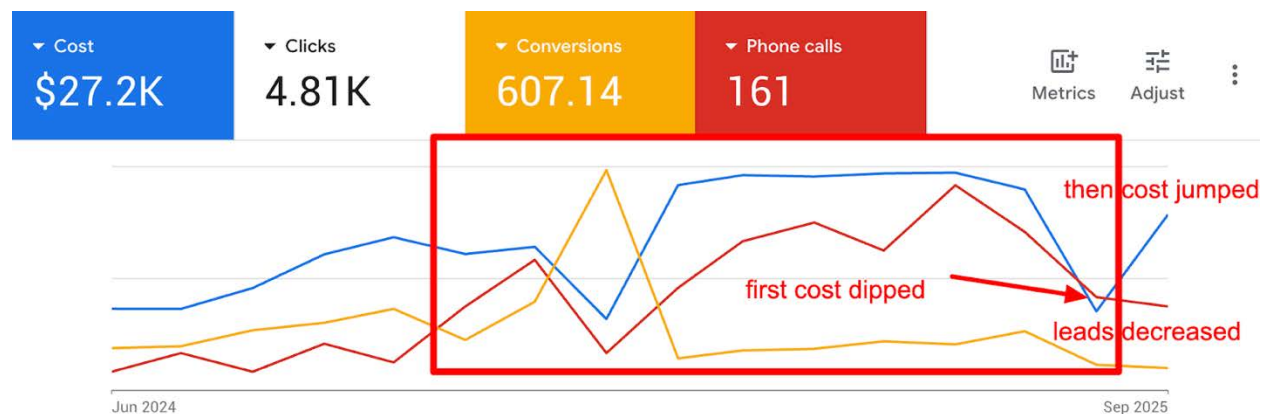
M is Good tried everything it knew should work for Google Ads, but the account still struggled. Eventually, Google offered a “solution”: sign their Certificate for PRCs. This certificate requires Gate PRC to display “Does not provide abortions” under every single ad when targeting abortion-related keywords.

Gate PRC signed it because it was the only way to get any visibility at all. Abortion clinics do not have to display any comparable disclaimer, such as “Does not provide prenatal or antenatal care.”

After signing, things slowly improved over about two years. By early 2025, Gate PRC was finally seeing decent results.

August 2025 - Everything Changed Overnight

In August 2025, something dramatic happened:



What Google Did:

- Drastically reduced PRC ad visibility
- Gate made no changes to its account
- Gate made no changes to its keyword strategy
- Gate received no warning or explanation
- Gate violated no policies

Immediate Impact:

- Costs dropped 60-70% (the ads just stopped showing)
- Leads dropped 60-70% (because no one could see its ads)
- Ads simply stopped appearing for its normal target keywords

September 2025 - Where Gate Is Now

Gate has been fighting to recover from August's sudden change. Here's what happened:

What It Has Recovered:

- Spending is back up (Google is taking its money again)
- Traffic has partially recovered (people are clicking on ads again)

What It Hasn't Recovered:

- Lead generation is still severely damaged
- Gate is getting 50% fewer leads than last year at this time
- Each lead now costs 3 times what it used to cost

What This Means:

Gate PRC is spending the same amount of money and getting clicks, but those clicks are not converting into leads the way they used to. Either Google is now showing Gate PRC's ads to the wrong people, or there are invisible restrictions still affecting who sees Gate PRC's ads and when.

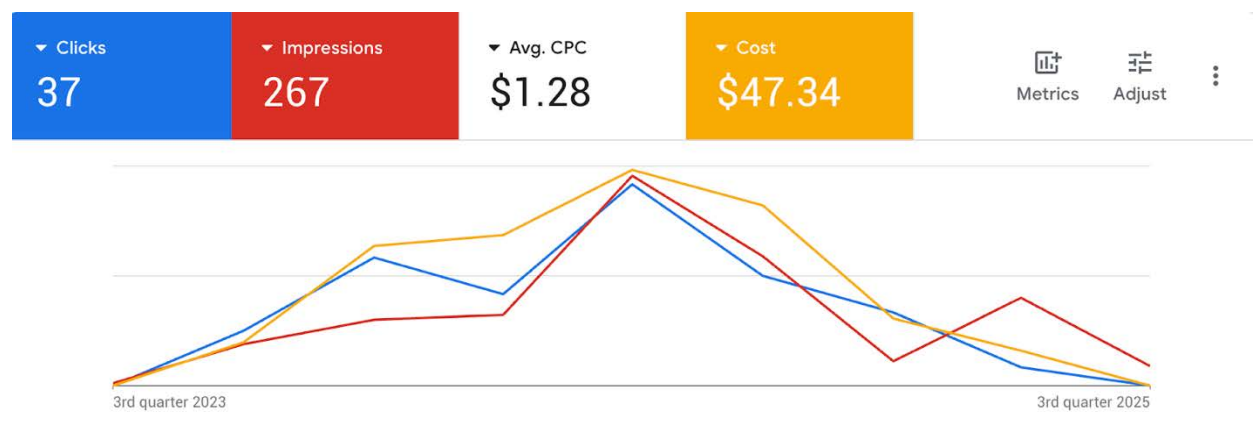
The Google Grant Problem

Google has a program for nonprofits that promises up to \$10,000 per month in free advertising credits. Gate PRC was approved for this grant on August 4, 2023.

What Google Promises:

Up to \$10,000 per month in advertising credits for qualified nonprofits

What Gate PRC Actually Got:



In over 27 months (August 2023 - September 2025):

- Total credits used: \$47.34
- Total ad views: 267
- Total clicks: 37
- Average monthly benefit: Less than \$2

This Isn't Just and Issue for Gate PRC

M is Good manages Google Grant accounts for dozens of nonprofits around the world - all types, all sizes, all causes. This is what M is Good is seeing:

Other nonprofits: Regular usage ranging from a few hundred dollars to nearly the full \$10,000 each month

Pregnancy Resource Centers: Consistently get almost nothing, regardless of how well M is Good manages their campaigns

M is Good has tried using the grant money for non-abortion keywords too – words like “pregnancy information,” “unplanned pregnancy help,” or “pregnancy clinics.” Same result: the ads barely show and the credits go unused.

The Double Standard

1. **Keyword Access:** Abortion clinics can advertise freely on abortion-related searches. PRCs cannot, or face severe restrictions.
2. **Disclosure Requirements:** PRCs must display “Does not provide abortions” on their ads. Abortion clinics are required to display nothing comparable.
3. **Map Visibility:** PRCs were removed from default Google Maps results. Abortion clinics remain visible.
4. **Grant Program:** Other nonprofits can use their Google Grant benefits. PRCs largely cannot.
5. **Arbitrary Changes:** Google can suddenly reduce PRC ad visibility without explanation or policy violation, as happened in August 2025.

Summary

Over 3-4 years of managing this account, M is Good has documented:

1. Systematic restrictions on PRCs that do not apply to abortion clinics
2. A forced disclosure requirement that only applies to one side
3. Removal from Google Maps that eliminated free visibility PRCs previously enjoyed
4. A grant program that promises \$10,000/month but delivers less than \$2/month
5. Sudden, unexplained throttling that caused a 50% drop in leads and tripled our cost per lead
6. Ongoing suppression where spending returns but conversion quality remains damaged

This is not about advertising skill or campaign quality. M is Good has managed successful campaigns for many types of organizations. The restrictions M is Good faces with PRCs are unique, consistent, and specifically target organizations that offer alternatives to abortion.