

EXHIBIT LL

From: "Taylor St. Germain" <tstgermain@reproequitynow.org>

To: "EXEMF (DPH)" <[REDACTED]>

Cc: Claire Teylouni <cteylouni@reproequitynow.org>

Subject: REN Statement on New DPH Guidance?

Date: Thu, 04 Jan 2024 15:31:59 +0000

Importance: Normal

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi [REDACTED]! Left you a voicemail, but wanted to check in and see if DPH would be amenable to REN putting out a statement on the new guidance for licensed providers.

I'm on the road for the next few hours but reachable via cell at 310-970-4314

Please see a draft of our statement below! Thanks!

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In Response to Complaints Filed Against Anti-Abortion Centers, MA DPH Issues Guidance Reminding Licensed Providers of Obligation to Provide Accurate, Complete Information to Patients

Repro Equity Now recently filed two complaints against licensed anti-abortion centers

BOSTON (January 4, 2024)—Reproductive Equity Now President Rebecca Hart Holder released the following statement today after the Massachusetts Department of Public Health [issued guidance outlining and 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."

Rebecca Hart Holder, President of Reproductive Equity Now: "Anti-abortion centers pose a serious threat to pregnant people seeking unbiased reproductive health care in Massachusetts. We're proud that the Department of Public Health is taking our complaints against these anti-abortion centers seriously and issued guidance to ensure that licensed providers and facilities understand their obligation to offer patients complete and accurate information on all of their reproductive health care options. We thank Commissioner Dr. Robert Goldstein for his bold leadership and look forward to continuing our work together to combat deception and disinformation from anti-abortion centers."

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Reproductive Equity Now recently filed two complaints against two different licensed Massachusetts anti-abortion centers: [Clearway Clinic in Worcester](#) and [Your Options Medical's new anti-abortion mobile van](#) preparing to operate on Cape Cod. Reproductive Equity Now called for an investigation surrounding the facilities' alleged deceptive advertising practices and potential out-of-scope medical practice.

Both complaints followed Massachusetts Commissioner of Public Health Dr. Robert Goldstein's [letter to the editor](#) in the *Boston Globe* that encouraged 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.

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. Anti-abortion centers often position themselves directly next to legitimate clinics to confuse patients.
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Communications Director
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310.970.4314
tstgermain@reproequitynow.org



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From: "EXEMF [REDACTED] (DPH)" <[REDACTED]>
To: "Taylor St. Germain" <tstgermain@reproequitynow.org>
Cc: "Claire Teylouni" <cteylouni@reproequitynow.org>
Subject: RE: REN Statement on New DPH Guidance?
Date: Thu, 04 Jan 2024 19:57:35 +0000
Importance: Normal

Hi Taylor –

Thanks so much for reaching out, and thanks for pulling together such a strong and supportive statement.

I had shared the statement with several people here, who liked and were very appreciative of it. The only comment I got was related to the major headline. The effort to ensure that these centers were operating appropriately has been a priority for this administration (and DPH) even before the complaints were filed. The headline, however, suggests that the complaints were the only reason for this renewed emphasis. The complaints certainly shine a much-needed light on some questionable operations and strengthen the resolve to do the right thing, but it is the overarching commitment to high-quality reproductive care and the deep concerns about these centers that are driving this effort.

Would it be possible for you to consider changing the major headline to:

MA DPH Issues Guidance about Anti-Abortion Centers, Reminding Licensed Providers of Obligation to Give Accurate, Complete Information to Patients

The subhead that focuses on REN filing the two complaints is great.

Let me know what you think, and whether this makes sense.

Thanks!

[REDACTED]

From: Taylor St. Germain <tstgermain@reproequitynow.org>
Sent: Thursday, January 4, 2024 10:32 AM
To: "EXEMF [REDACTED] (DPH)" <[REDACTED]>
Cc: Claire Teylouni <cteylouni@reproequitynow.org>
Subject: REN Statement on New DPH Guidance?

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WHITING003529

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From: "Taylor St. Germain" <tstgermain@reproequitynow.org>

To: "Slasman, Peggy (DPH)" <Peggy.Slasman@mass.gov>

Cc: Claire Teylouni <cteylouni@reproequitynow.org>

Subject: Re: REN Statement on New DPH Guidance?

Date: Thu, 04 Jan 2024 20:07:51 +0000

Importance: Normal

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Let me know what you think!

On Thu, Jan 4, 2024 at 2:57 PM Slasman, Peggy (DPH) <Peggy.Slasman@mass.gov> wrote:

Hi Taylor –

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I had shared the statement with several people here, who liked and were very appreciative of it. The only comment I got was related to the major headline. The effort to ensure that these centers were operating appropriately has been a priority for this administration (and DPH) even before the complaints were filed. The headline, however, suggests that the complaints were the only reason for this renewed emphasis. The complaints certainly shine a much-needed light on some questionable operations and strengthen the resolve to do the right thing, but it is the overarching commitment to high-quality reproductive care and the deep concerns about these centers that are driving this effort.

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Thanks!

Peggy

From: Taylor St. Germain <tstgermain@reproequitynow.org>
Sent: Thursday, January 4, 2024 10:32 AM
To: Slasman, Peggy (DPH) <Peggy.Slasman@mass.gov>
Cc: Claire Teylouni <cteylouni@reproequitynow.org>
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EXHIBIT LL

From: "EXEMF [REDACTED] (DPH)" <[REDACTED]>
To: "Taylor St. Germain" <tstgermain@reproequitynow.org>
Cc: "Claire Teylouni" <cteylouni@reproequitynow.org>
Subject: RE: REN Statement on New DPH Guidance?
Date: Thu, 04 Jan 2024 20:19:37 +0000
Importance: Normal

Thanks, Taylor. That's certainly better, but I think the general point was that we would be – and should be -- doing this in the absence of any complaints because it's the right thing to do. If there's an impression that we're taking this action because we have to investigate complaints, then that's probably not the most accurate or best representation. You're point, however, about the language on the web site is well-taken. We were using the complaints as a reason to put out this guidance now rather than March, when the health marketing campaign launches. We're hoping to do a media push in March, but didn't want to wait until then to announce this guidance.

Ultimately, it's your statement and you need to do what you think is best. We are grateful for the opportunity to see it and comment on it. It's great, and as I said, people here are so appreciative of the work and support of REN!

Best,

From: Taylor St. Germain <tstgermain@reproequitynow.org>
Sent: Thursday, January 4, 2024 3:08 PM
To: "EXEMF [REDACTED] (DPH)" <[REDACTED]>
Cc: Claire Teylouni <cteylouni@reproequitynow.org>
Subject: Re: REN Statement on New DPH Guidance?

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Let me know what you think!

On Thu, Jan 4, 2024 at 2:57 PM "EXEMF [REDACTED] (DPH)" <[REDACTED]> wrote:

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WHITING003536

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Sent: Thursday, January 4, 2024 10:32 AM
To: EXEMP (DPH) <>
Cc: Claire Teylouni <cteylouni@reproequitynow.org>
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Subject: Re: REN Statement on New DPH Guidance?

Date: Thu, 04 Jan 2024 21:07:54 +0000

Importance: Normal

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No problem, [REDACTED] We'll do:

Repro Equity Now Statement on New MA DPH Guidance About Anti-Abortion Centers

With a subhead that refers to the work REN has done on the complaints.

Will send first thing in the morning.

Thanks!

Taylor

Taylor St. Germain (she/her)
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WHITING003541

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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.

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."
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EXHIBIT LL

From: "EXEMF [REDACTED] (DPH)" <[REDACTED]>
To: "Taylor St. Germain" <tstgermain@reproequitynow.org>
Cc: "Claire Teylouni" <cteylouni@reproequitynow.org>
Subject: RE: REN Statement on New DPH Guidance?
Date: Thu, 04 Jan 2024 21:10:33 +0000
Importance: Normal

Thank YOU!

From: Taylor St. Germain <tstgermain@reproequitynow.org>
Sent: Thursday, January 4, 2024 4:08 PM
To: "EXEMF [REDACTED] (DPH)" <[REDACTED]>
Cc: Claire Teylouni <cteylouni@reproequitynow.org>
Subject: Re: REN Statement on New DPH Guidance?

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

No problem, [REDACTED]. We'll do:

Repro Equity Now Statement on New MA DPH Guidance About Anti-Abortion Centers

With a subhead that refers to the work REN has done on the complaints.

Will send first thing in the morning.

Thanks!

Taylor

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tstgermain@reproequitynow.org



On Thu, Jan 4, 2024 at 3:19 PM "EXEMF [REDACTED] (DPH)" <[REDACTED]> wrote:

Thanks, Taylor. That's certainly better, but I think the general point was that we would be – and should be -- doing this in the absence of any complaints because it's the right thing to do. If there's an impression that we're taking this action because we have to investigate complaints, then that's probably not the most accurate or best representation. Your point, however, about the language on the web site is well-taken. We were using the complaints as a reason to put out this guidance now rather than March, when the health marketing campaign launches. We're hoping to do a media push in March, but didn't want to wait until then to announce this guidance.

Ultimately, it's your statement and you need to do what you think is best. We are grateful for the opportunity to see it and comment on it. It's great, and as I said, people here are so appreciative of the work and support of REN!

WHITING003545

EXHIBIT LL

Best,

From: Taylor St. Germain <tstgermain@reproequitynow.org>

Sent: Thursday, January 4, 2024 3:08 PM

To: EXEMF (DPH) <[REDACTED]>

Cc: Claire Teylouni <cteylouni@reproequitynow.org>

Subject: Re: REN Statement on New DPH Guidance?

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I hear you! We had pulled that since the website said "In the wake of recent complaints regarding several anti-abortion centers, DPH has initiated a review of its statutory and regulatory obligations."

Perhaps we could change our headline to: Following (instead of In Response to) Complaints Filed Against Anti-Abortion Centers, MA DPH Issues Guidance Reminding Licensed Providers of Obligation to Provide Accurate, Complete Information to Patients

Let me know what you think!

On Thu, Jan 4, 2024 at 2:57 PM EXEMF (DPH) <[REDACTED]> wrote:

Hi Taylor –

Thanks so much for reaching out, and thanks for pulling together such a strong and supportive statement.

I had shared the statement with several people here, who liked and were very appreciative of it. The only comment I got was related to the major headline. The effort to ensure that these centers were operating appropriately has been a priority for this administration (and DPH) even before the complaints were filed. The headline, however, suggests that the complaints were the only reason for this renewed emphasis. The complaints certainly shine a much-needed light on some questionable operations and strengthen the resolve to do the right thing, but it is the overarching commitment to high-quality reproductive care and the deep concerns about these centers that are driving this effort.

Would it be possible for you to consider changing the major headline to:

MA DPH Issues Guidance about Anti-Abortion Centers, Reminding Licensed Providers of Obligation to Give Accurate, Complete Information to Patients

The subhead that focuses on REN filing the two complaints is great.

Let me know what you think, and whether this makes sense.

Thanks!

EXEMF

WHITING003546

EXHIBIT LL

From: Taylor St. Germain <tstgermain@reproequitynow.org>
Sent: Thursday, January 4, 2024 10:32 AM
To: EXEMP (DPH) <[REDACTED]>
Cc: Claire Teylouni <cteylouni@reproequitynow.org>
Subject: REN Statement on New DPH Guidance?

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi [REDACTED]! Left you a voicemail, but wanted to check in and see if DPH would be amenable to REN putting out a statement on the new guidance for licensed providers.

I'm on the road for the next few hours but reachable via cell at 310-970-4314

Please see a draft of our statement below! Thanks!

In Response to Complaints Filed Against Anti-Abortion Centers, MA DPH Issues Guidance Reminding Licensed Providers of Obligation to Provide Accurate, Complete Information to Patients

Repro Equity Now recently filed two complaints against licensed anti-abortion centers

BOSTON (January 4, 2024)—Reproductive Equity Now President Rebecca Hart Holder released the following statement today after the Massachusetts Department of Public Health [issued guidance outlining and 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.”

Rebecca Hart Holder, President of Reproductive Equity Now: “Anti-abortion centers pose a serious threat to pregnant people seeking unbiased reproductive health care in Massachusetts. We’re proud that the Department of Public Health is taking our complaints against these anti-abortion centers seriously and issued guidance to ensure that licensed providers and facilities understand their obligation to offer patients complete and accurate information on all of their reproductive health care options. We thank Commissioner Dr. Robert Goldstein for his bold leadership and look forward to continuing our work together to combat deception and disinformation from anti-abortion centers.”

Reproductive Equity Now recently filed two complaints against two different licensed Massachusetts anti-abortion centers: [Clearway Clinic in Worcester](#) and [Your Options Medical's new anti-abortion mobile van](#) preparing to operate on Cape Cod. Reproductive Equity Now called for an investigation surrounding the facilities’ alleged deceptive advertising practices and potential out-of-scope medical practice.

EXHIBIT LL

Both complaints followed Massachusetts Commissioner of Public Health Dr. Robert Goldstein's [letter to the editor](#) in the *Boston Globe* that encouraged 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.

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