

EXHIBIT AA

AAC CONSUMER CAMPAIGN

Additional Campaign CTAs (Calls to Action)

Once a concept is selected for launch, ads will be created for multiple paid media channels. There will be **variations of ads** to spotlight priority key messages and **CTAs** to encourage specific action steps.

- 1. Primary CTA:** "Find an abortion provider" and/or "find abortion care" will be featured most frequently, in order to direct individuals to a list/map of trusted providers and give more information about AACs.
- 2. Learn how to spot an anti-abortion center:** This CTA will direct individuals to warning signs that a facility is an AAC and how to identify them.
- 3. File a complaint:** This campaign will help connect individuals to information and support to file complaints against AACs. Some ads will direct to this specific sub-page in mass.gov with information about complaints.

more

EXHIBIT BB

AVOID Anti-Abortion Centers

What are anti-abortion centers?

Anti-abortion centers, often called “crisis pregnancy centers,” may look like medical clinics but don’t offer comprehensive reproductive health care.

Some advertise abortion counseling, but they do not provide abortion care or referrals to abortion providers.

Anti-abortion centers may mislead pregnant people about their options, delay their care, and can put their health at risk.



Get care you can
TRUST

Find trusted reproductive health care providers, including abortion providers at mass.gov/GetTrustedCare



Massachusetts
Department
of Public Health

EXHIBIT BB

**Have you been
harmed by an
anti-abortion
center?**



**Learn how
to file a
complaint**

If you have been to an anti-abortion center and have concerns about your experience, you can **file a complaint online** or call the Attorney General's Civil Rights Division at **(617) 963-2917**.

mass.gov/GetTrustedCare
#GetTrustedCare

EXHIBIT BB

AVOID Anti-Abortion Centers

What You Need to Know

Anti-abortion centers, often called “crisis pregnancy centers,” may purposefully try to look like medical clinics, but **do NOT offer comprehensive care.**

Anti-abortion centers can put your health at risk

- ✓ They may use **deceptive advertising** to look like they provide abortion services or referrals.
- ✓ Some anti-abortion centers offer free resources like pregnancy tests or ultrasounds, but then they may try to **delay your care** or **mislead** you about how far along your pregnancy is.
- ✓ Many have **untrained staff and volunteers** who are not licensed medical professionals or trained to read results of ultrasounds.
- ✓ They often provide **misinformation** about abortion to prevent you from making an informed choice.

There are more than 30 anti-abortion centers in Massachusetts.

Even if you're not looking for an abortion, these centers are not a safe or trusted place to go for reproductive health care.



mass.gov/GetTrustedCare
#GetTrustedCare



Massachusetts Department
of Public Health

Looking for abortion care? Want to learn about your options if you're pregnant?



Get care you can
TRUST

Inline-Images: image001.png; image002.png; image003.png; image004.jpg

WHITING003011

EXHIBIT DD

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

To: "Crowther, Suzanne (DPH)" <suzanne.crowther@mass.gov>

Cc: "[REDACTED] (DPH)" <[REDACTED]>, Ashley Rappa <arappa@moreadvertising.com>, Anna Marie Finley <afinley@moreadvertising.com>, "Leonard, Michelle A (DPH)" <Michelle.A.Leonard2@mass.gov>, Michelle Leonard <[REDACTED]>, "[REDACTED] (DPH)" <[REDACTED]>, "[REDACTED] (DPH)" <[REDACTED]>, "[REDACTED] (DPH)" <[REDACTED]>, "[REDACTED] (DPH)" <[REDACTED]>, "[REDACTED] (DPH)" <[REDACTED]>, "rhartholder@reproequitynow.org" <rhartholder@reproequitynow.org>, "cteylouni@reproequitynow.org" <cteylouni@reproequitynow.org>, Will McMahon <wmcmahon@moreadvertising.com>, Jill Caruso <jcaruso@moreadvertising.com>, Annika Cook <acook@moreadvertising.com>

Subject: Re: AAC Creative Concepts for Commissioner/testing approval

Date: Thu, 16 Nov 2023 14:38:02 +0000

Importance: Normal

Inline-Images: image003.jpg; image004.png; image005.jpg

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.

Thanks, all! These look great. A couple quick pieces of feedback that may be addressed within testing!

On concept 1, it's a little confusing if you don't know that anti-abortion centers are called multiple names to have crisis pregnancy centers in quotes without "or" or "otherwise known as", etc. I really like what you did in concepts 2 & 3 to make it clear in the subtext. I'm wondering if there is a way to do this with concept 1, either in subtext or ad copy.

On concept 1, I know we were looking for a person with their mouth closed. This image feels like the subject is a little too happy for the context. Is there an image of a person that is not subtly smiling?

On concept 1, having the URL backend be "AbortionTruth" makes it kind of sound like an anti-abortion campaign. They love to say "learn the truth about how dangerous abortion is" etc.

On concept 3, I tend to agree with [REDACTED]. I get nervous about mimicking the AAC's scare tactics. Abortion, for a lot of people, is a really empowering decision.

Thanks, y'all! So awesome to see these all come together.

Taylor

On Thu, Nov 16, 2023 at 7:33 AM Crowther, Suzanne (DPH) <suzanne.crowther@mass.gov> wrote:

Thanks for your feedback Ashley. I am always up for conversations about this stuff and appreciate the additional context you provided.

Concept 1: I get the balance of the Truth CTA with the Lie concept, but I feel strongly that the Truth line in concept one actually detracts from the main message. It's much cleaner, easy to follow and to the point without it.

—



O 617.558.6850 // C 603.475.2257 // MOREadvertising.com

WHITING003271

Suzanne

From: Anna Marie Finley <AFinley@moreadvertising.com>
Sent: Wednesday, November 15, 2023 3:12:22 PM
To: Crowther, Suzanne (DPH) <suzanne.crowther@mass.gov>; Leonard, Michelle A (DPH) <Michelle.A.Leonard2@mass.gov>; Michelle Leonard [REDACTED]; [REDACTED] (DPH)
[REDACTED]; [REDACTED] (DPH) <[REDACTED]>; [REDACTED] (DPH)
[REDACTED]; [REDACTED] (DPH) <[REDACTED]>; [REDACTED]
(DPH) <[REDACTED]>; rhartholder@reproequitynow.org <rhartholder@reproequitynow.org>;
tstgermain@reproequitynow.org <tstgermain@reproequitynow.org>; cteylouni@reproequitynow.org
<cteylouni@reproequitynow.org>; [REDACTED] (DPH) <[REDACTED]>
Cc: Will McMahon <wcmahon@moreadvertising.com>; Ashley Rappa <arappa@moreadvertising.com>;
Jill Caruso <jcaruso@moreadvertising.com>; Annika Cook <acook@moreadvertising.com>
Subject: AAC Creative Concepts for Commissioner/testing approval

WHITING003272

EXHIBIT DD

Thanks so much,

Anna Marie

more

Anna Marie Finley (She/Her)

Director, Account Services

MORE Advertising // 50 Hunt Street, Watertown, MA, 02472

O 617.558.6850 // C 443-695-2987 // MOREadvertising.com

Change Powers Us

--
Taylor St. Germain (she/her)
Communications Director
Reproductive Equity Now
310.970.4314
tstgermain@reproequitynow.org



EXHIBIT EE

To: "Goldstein, Robert (DPH)" <Robert.Goldstein@mass.gov>, "McLaughlin, Beth D. (DPH)" <beth.d.mclaughlin@mass.gov>, "Barrelle, Jennifer (DPH)" <jennifer.barrelle@mass.gov>, "Cosmas, Karen (DPH)" <Karen.Cosmas@mass.gov>, "Slasman, Peggy (DPH)" <Peggy.Slasman@mass.gov>, "Scales, Ann (DPH)" <ann.scales@mass.gov>, "McNamara, Torey (DPH)" <Torey.McNamara@mass.gov>, "McLaughlin, Beth D. (DPH)" <beth.d.mclaughlin@mass.gov>

Cc: "McGeown-Conron, Ryan C (DPH)" <Ryan.C.McGeown-Conron@mass.gov>, "Dudley-Youngs, Hannah (DPH)" <Hannah.Dudley-Youngs@mass.gov>, "White, Rebecca (DPH)" <rebecca.white@mass.gov>

Subject: RE: For EHS review by Dec 4: Anti-abortion center package (licensure guidance, comms strategy)

Importance: Normal

Embedded: unnamed

Hi DPH team

Sharing an update for awareness on seeking approval for the Anti-abortion center package. The Outreach Plan (shared link with EHS & Gov's office) is here: [Outreach Plan - anti-abortion center guidance - 12.6.2023.docx \(sharepoint.com\)](#)

- 12/6 – Asked to develop Outreach Plan for Anti-Abortion Centers
 - Updated Outreach Plan based on Gov's office feedback
- 12/13 – remain on "hold" by Gov's office (email attached for reference)

Emily I. Dally, MPH (pronouns: she/her)
 Chief of Staff
 Massachusetts Department of Public Health
 E: emily.i.dally@mass.gov
 P: +1 (617) 821-2980

From: Dally, Emily I (DPH)

Sent: Monday, November 27, 2023 11:27 AM

To: Beckman, Mary A (EHS) <Mary.A.Beckman@mass.gov>; Boyle, Sharon (EHS) <sharon.c.boyle@mass.gov>; Mahaniah, Kiame J (EHS) <Kiame.J.Mahaniah@mass.gov>; Bianco, Amy (EHS) <Amy.Bianco@mass.gov>; Harding, Christopher (EHS) <Christopher.Harding2@mass.gov>; Hay, Jeremiah (EHS) <Jeremiah.Hay1@mass.gov>; Segal, Tami (EHS) <Tami.Segal@mass.gov>; Whitehouse, Caroline (EHS) <Caroline.Whitehouse@mass.gov>

Cc: Goldstein, Robert (DPH) <Robert.Goldstein@mass.gov>; McLaughlin, Beth D. (DPH) <beth.d.mclaughlin@mass.gov>; Barrelle, Jennifer (DPH) <jennifer.barrelle@mass.gov>; Cosmas, Karen (DPH) <Karen.Cosmas@mass.gov>; Slasman, Peggy (DPH) <Peggy.Slasman@mass.gov>; Scales, Ann (DPH) <ann.scales@mass.gov>; McNamara, Torey (DPH) <Torey.McNamara@mass.gov>

Subject: For EHS review by Dec 4: Anti-abortion center package (licensure guidance, comms strategy)

Good morning Kiame, Mary, Sharon, Amy, Caroline, Chris, Jeremiah, Tami,

As part of our efforts to protect and improve access to comprehensive reproductive health care, DPH is deeply concerned with anti-abortion centers (previously referred to as crisis pregnancy centers or "CPCs") operating in the Commonwealth. These centers do not provide complete information, such as abortion options, to individuals seeking their services – and in many instances individuals receive misinformation. There was press earlier this year about two centers operating in Massachusetts, one [noting an instance of patient harm](#) due to poor care received at the center and another regarding a [mobile anti-abortion service](#) coming online on the Cape. In these instances, both are licensed clinics; however, the vast majority of these centers are not licensed (only 4 out of 29 are licensed clinics).

EXHIBIT FF



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: Clearway Clinic, anti-abortion center deceptive practices and patient endangerment

December 4, 2023

To Whom it May Concern:

I write on behalf of Reproductive Equity Now¹ to register our concern with the practices detailed in a recent lawsuit against Clearway Clinic, a Worcester anti-abortion center, which allegedly resulted in life-threatening complications and emergency surgery for a pregnant woman who sought care at Clearway.² Clearway Clinic is licensed by the Massachusetts Department of Public Health.³ The woman, referred to as Jane Doe to protect her identity, sued Clearway Clinic in a class action lawsuit that details the harms she suffered as a result of alarming practices at Clearway. Among Clearway's alleged practices are deceptive advertising, out-of-scope practice, and improper delegation of medical services, all of which endangered the life of Jane Doe. The alleged practices of Clearway Clinic harm both people seeking abortion care and patients in need of basic pregnancy care. We urge an investigation into the practices of Clearway Clinic and the staff who treated Jane Doe.

I. Background

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 Anti-abortion centers (AACs), commonly referred to as "crisis pregnancy centers" or "CPCs", work 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. Frequently, AACs are religiously affiliated and do not provide abortion or contraception or make referrals for abortion or contraceptive care, though some such as Clearway Clinic, do provide pregnancy tests, STI testing and treatment, and ultrasounds. See Melissa N Montoya et al., *The Problems with Crisis Pregnancy Centers: Reviewing the Literature and Identifying New Directions for Future Research*, 14 INT'L JOURNAL OF WOMEN'S HEALTH 757 (June 8, 2022), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9189146/>.

³ MASS. DEP'T OF PUBLIC HEALTH DIV. OF HEALTH CARE FACILITY LICENSURE & CERTIFICATION, FIND INFORMATION ABOUT LICENSED OR CERTIFIED HEALTH CARE FACILITIES, <https://www.mass.gov/info-details/find-information-about-licensed-or-certified-health-care-facilities>, (last visited Dec. 5, 2023).

EXHIBIT FF

According to the complaint, in October 2022, Jane Doe booked a same-day appointment with Clearway Clinic's Worcester location when she thought she may be pregnant.⁴ The woman was seen by a nurse who conducted a limited number of ultrasounds and diagnosed the pregnancy as both viable and in utero and "sent the woman home believing she was carrying a completely healthy baby."⁵ Despite only being seen by the nurse, the woman was given paperwork at the end of her visit indicating she had been treated by Dr. Erin Kate Dooley.⁶

One month after her Clearway appointment, Jane Doe experienced sharp and shooting pain in her side and was rushed to the hospital. The emergency room doctors diagnosed the woman with an ectopic pregnancy, a potentially life-threatening condition in which the fetus grows outside the uterus.⁷ The ectopic pregnancy had ruptured and caused "massive internal bleeding."⁸ The woman underwent emergency surgery to stop the hemorrhaging and doctors removed one of her fallopian tubes.⁹ Had Doe been properly diagnosed at her October appointment, she could have received less invasive treatment to terminate the pregnancy and may not have lost her fallopian tube.¹⁰

An ectopic pregnancy is never a viable pregnancy and is potentially life-threatening to the pregnant person. Withholding or delaying treatment can cause death.¹¹ Treatment for an ectopic pregnancy is termination either via medication or surgery.¹² However, Clearway states on their website "we do not offer or refer for abortions."¹³ As pregnancy termination is the appropriate treatment for ectopic pregnancy, Clearway's anti-abortion policy raises the question as to whether they would have provided the appropriate treatment for the ectopic pregnancy if they had properly diagnosed it.

II. Deceptive Advertising

Clearway deceptively advertises pregnancy diagnosis services, yet the allegations outlined in the recent lawsuit raise questions about who provides pregnancy diagnostic services and their ability to appropriately diagnose pregnancy viability. Clearway advertises their services are provided by a "team of board certified doctors and nurses,"¹⁴ yet, according to Jane Doe's

⁴ 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), available at <https://www.bostonglobe.com/2023/06/22/metro/clearway-clinic-lawsuit/>.

⁵ *Id.*

⁶ Kiernan Dunlop, *Worcester woman suing Clearway Clinic claims missed diagnosis put her life at risk*, MASSLIVE (June 23, 2023), available at <https://www.masslive.com/worcester/2023/06/worcester-woman-suing-clearway-clinic-claims-missed-diagnosis-put-her-life-at-risk.html>.

⁷ THE AM. COLLEGE OF OBSTETRICIANS & GYNECOLOGISTS, FAQs: ECTOPIC PREGNANCY (last updated July 2022), <https://www.acog.org/womens-health/faqs/ectopic-pregnancy#:~:text=An%20ectopic%20pregnancy%20occurs%20when,can%20cause%20major%20internal%20bleeding>.

⁸ Scott *supra* note 4.

⁹ *Id.*

¹⁰ *Id.*

¹¹ THE AM. COLL. OF OBSTETRICIANS & GYNCOLOGISTS, FACTS ARE IMPORTANT: UNDERSTANDING ECTOPIC PREGNANCY <https://www.acog.org/advocacy/facts-are-important/understanding-ectopic-pregnancy#:~:text=A%20tubal%20ectopic%20pregnancy%20will,ectopic%20pregnancy%3A%20medication%20and%20surgery> (last visited Dec. 1, 2023).

¹² *Id.*

¹³ *Thinking About Abortion?*, CLEARWAY CLINIC, (<https://clearwayclinic.com/thinking-about-abortion/>) (last visited Dec. 1, 2023).

¹⁴ *About Us*, CLEARWAY CLINIC, (<https://clearwayclinic.com/about-us/>) (last visited Dec. 1, 2023).

EXHIBIT FF

attorneys, she was seen only by a nurse despite being given treatment paperwork signed by Dr. Dooley.¹⁵ This advertising and documentation practice may give patients the false impression of who is providing their treatment. Additionally, Clearway advertises ultrasound services to “[d]etermine the viability of a pregnancy [and] [d]etermine the location of an embryo or fetus.”¹⁶ Advertising diagnostic ultrasounds to determine the location of an embryo is not accurate if, as Jane Doe alleges, Clearway staff did not properly diagnose her ectopic pregnancy. It is against nursing standards of conduct for nurses to “engage in false, deceptive, or misleading advertising related to the practice of nursing.”¹⁷ Additionally, it is “against the public interest” for advertising of the practice of medicine to be “false, deceptive, or misleading.”¹⁸ Any potential deceptive advertising in violation of Board of Registration in Nursing and Board of Registration in Medicine regulations should be investigated further.

III. Out-of-Scope Practice and Improper Delegation of Medical Services

In addition to the potentially deceptive and misleading advertising practices in violation of Board of Registration in Nursing and Board of Registration in Medicine regulations, Jane Doe’s allegations raise the troubling policy that Clearway Clinic may routinely permit out-of-scope diagnostic ultrasound services. As the woman was seen only by a nurse, we are concerned that registered nurses may be routinely operating outside of their scope of practice by diagnosing ultrasounds. Registered nurses are not permitted to diagnose; only licensed doctors or Advanced Practice Registered Nurses are permitted to do so.¹⁹ Out-of-scope practice is not only unlawful, but also can result in a misdiagnosis as we have seen documented in the woman’s complaint. This merits serious inquiry by the appropriate licensing bodies.

Additionally, we raise concerns about the potential for improper delegation of medical services by Dr. Dooley who signed Jane Doe’s medical paperwork. Jane Doe reports she was seen only by a nurse at her appointment but was provided paperwork indicating that she had been treated by Dr. Dooley. As Dr. Dooley did not interact with the woman, it raises the serious question as to whether Dr. Dooley improperly delegated medical services to the nurse who is not licensed to perform diagnostic services resulting in grave risk to Jane Doe’s life. Any such delegation of medical services is impermissible under Board of Registration in Medicine regulations.²⁰

IV. Request for Investigation

We are alarmed by press reports about the practices of Clearway Clinic that resulted in an emergency life-saving surgery for a woman who sought basic and routine pregnancy care at their Worcester location. The allegations detailed in the class action lawsuit create a basis for an investigation as to whether Clearway endorses out-of-scope practice at its clinics and has engaged in deceptive and false advertising. We urge an investigation 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 by Clearway Clinic and Dr. Erin Kate Dooley.

¹⁵ Dunlop *supra* note 6.

¹⁶ *Ultrasound Exam*, CLEARWAY CLINIC (<https://clearwayclinic.com/ultrasound-exam/>) (last visited Dec. 1, 2023).

¹⁷ 244 CMR 9.03.

¹⁸ 243 CMR 2.0.

¹⁹ 243 CMR 2.01; 244 CMR 3.02; 244 CMR 10.0.

²⁰ 243 CMR 207.

EXHIBIT FF

Sincerely,



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

EXHIBIT GG

To: Maura Healey, Governor
Kim Driscoll, Lt. Governor
From: Robert Goldstein, Commissioner, Department of Public Health
cc: Kate Walsh, Secretary, Executive Office of Health and Human Services
Mary Beckman, Senior Advisor, Executive Office of Health and Human Services
Date: December 5, 2023
Re: Guidance Clarifying Licensure Requirements for Anti-Abortion Center Operation and Care Delivery

This memorandum requests authorization for DPH to release licensure guidance clarifying licensure requirements for anti-abortion center operation and care delivery, public/cover messaging to accompany the licensure guidance, and a communications strategy.

As part of DPH's efforts to protect and improve access to comprehensive reproductive health care, DPH is deeply concerned with anti-abortion centers (previously referred to as crisis pregnancy centers or "CPCs") operating in the Commonwealth. These centers do not provide complete information, such as abortion options, to individuals seeking their services – and in many instances individuals receive misinformation. DPH seeks to release the guidance and cover messaging the week of December 4, or as soon as possible thereafter. Each are briefly described below.

1. **Licensure guidance:** DPH plans to issue guidance to its licensed facilities and professionals outlining and reminding them of their obligations to provide the standard of care to patients, including providing complete information on reproductive health options and not providing misleading information. This document is meant to serve as a strong reminder of requirements under licensure.
2. **Public/cover messaging for licensure guidance:** DPH drafted public-facing language to couple with the guidance – this could be used for media, and also shared as a cover letter to the guidance and posted alongside when posting the guidance online.
3. **Communications strategy:** DPH's planned communications strategy includes a comprehensive health marketing campaign to be launched Spring 2024. DPH has been in touch with AGO staff and is sharing materials with them in parallel given that they refer to potential action.

Additional information on press strategy, stakeholder and legislative outreach, and talking points is included in the attached outreach plan.

EXHIBIT GG

Pre-deliberative Draft Document for Internal Use Only

12/6/2023

12/6/2023

Secretariat Lead: EOHHS**Agency:** DPH**Initiative Title:** Guidance Clarifying Licensure Requirements for Anti-Abortion Center Operation and Care Delivery**Anticipated Implementation Start Date:** ASAP**Anticipated Implementation End Date:** N/A – ongoing guidance to licensees**General Overview**

As part of our efforts to protect and improve access to comprehensive reproductive health care, DPH is deeply concerned with anti-abortion centers (previously referred to as crisis pregnancy centers or “CPCs”) operating in the Commonwealth. These centers do not provide complete information, such as abortion options, to individuals seeking their services – and in many instances individuals receive misinformation. There was press earlier this year about two centers operating in Massachusetts, one [REDACTED] due to poor care received at the center and another regarding a [REDACTED] coming online on the Cape. In these instances, both are licensed clinics; however, the vast majority of these centers are not licensed (only 4 out of 29 are licensed clinics).

DPH has developed a set of materials (summarized below) to respond to these concerns and would like to release these materials as soon as possible.

Stakeholder/Legislative Strategy***Non-Legislative Stakeholders:***

Non-Legislative Stakeholder	Outreach Lead	Timing
Reproductive Equity Now	Karen Cosmas	ASAP, in advance of formal release
Planned Parenthood of Massachusetts	Karen Cosmas	ASAP, in advance of formal release
Attorney General Office	Commissioner Goldstein/Beth McLaughlin	ASAP, in advance of formal release
Indivisible Group	Karen Cosmas	ASAP, in advance of formal release
Abortion Truth Coalition	Karen Cosmas	ASAP, in advance of formal release

Legislative Stakeholders:

Legislator Name	Outreach Lead	Timing
Senate President	Ryan McGeown-Conron	ASAP, in advance of formal release

WHITING003423

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12/6/2023

Speaker	Ryan McGeown-Conron	ASAP, in advance of formal release
Minority Leader Tarr	Ryan McGeown-Conron	ASAP, in advance of formal release
Minority Leader Jones	Ryan McGeown-Conron	ASAP, in advance of formal release
Senator Julian Cyr	Ryan McGeown-Conron	ASAP, in advance of formal release
Senator Becca Rausch	Commissioner Goldstein	ASAP, in advance of formal release
Rep. John Lawn	Ryan McGeown-Conron	ASAP, in advance of formal release
Senator Cindy Friedman	Ryan McGeown-Conron	ASAP, in advance of formal release
Rep. Aaron Michlewitz	Ryan McGeown-Conron	ASAP, in advance of formal release
Senator Michael Rodrigues	Ryan McGeown-Conron	ASAP, in advance of formal release
Rep. Marjorie Decker	Commissioner Goldstein	ASAP, in advance of formal release
Rep. Lindsay Sabadosa	Ryan McGeown-Conron	ASAP, in advance of formal release
Rep. Hannah Kane	Ryan McGeown-Conron	ASAP, in advance of formal release
Senator Joan Lovely	Ryan McGeown-Conron	ASAP, in advance of formal release
Rep. Bud Williams	Ryan McGeown-Conron	ASAP, in advance of formal release
Senator Liz Miranda	Ryan McGeown-Conron	ASAP, in advance of formal release
Senator Jo Comerford	Ryan McGeown-Conron	ASAP, in advance of formal release
Senator Cronin	Ryan McGeown-Conron	ASAP, in advance of formal release
Rep. Chan	Ryan McGeown-Conron	ASAP, in advance of formal release
Congressional Delegation	Ryan McGeown-Conron	Spoke with Will Rasky embargoed email prior to public release

Press Strategy**Press release** – (DPH identifying potential news hook/proactive pitch opportunities)

WHITING003424

EXHIBIT GG

Pre-deliberative Draft Document for Internal Use Only

12/6/2023

- Announce that DPH has undertaken a comprehensive review of its statutory and regulatory obligations for anti-abortion centers to protect well-being of people in Commonwealth.
- Focus on what factors drove this deeper look into anti-abortion centers and the redoubled efforts to make sure that the facilities are complying with required laws and regulations.
- Promote the multi-faceted approach to making sure that the anti-abortion centers are not harming patients, not misrepresenting what they do and not deceiving the public.
- Provide guidance as to what patients of these centers should do if they have concerns or questions about the care provided at the centers or the staff members delivering the services.
- Include how this effort is focused on educating the public about these centers and their limitations, and alerting the public that those who have concerns or clinical questions should contact DPH.
 - Note: DPH is working with Attorney General's Office, which has established the Reproductive Justice Unit to protect consumers and taking action against facilities that are deceiving people.

Health Marketing Campaign about Anti-Abortion Centers and Getting the Care that is Right for You

- \$1M paid media campaign focused on anti-abortion centers is slated to launch in March 2024
- Currently in process of narrowing down concepts and testing the concepts in focus groups.
- Goal is to educate public about these centers, what these facilities do, and what to beware of and help prevents centers from engaging in deceptive practices.

Social Media

- Amplify messaging from press release and marketing campaign through DPH social channels.

Validators – Outside Organizations to Support/Comment on DPH Plan

- Reproductive Equity Now
- ACOG
- Planned Parenthood

Talking Points

- The Department of Public Health (DPH) is charged with promoting and protecting the health and well-being of people throughout the Commonwealth, a responsibility that includes overseeing the practices and providers delivering health care and services across the state.
- In the wake of recent complaints regarding several anti-abortion centers and given DPH's commitment to comprehensive reproductive health care access, DPH has initiated a review of its statutory and regulatory obligations to make sure DPH professional licensees and facility licensees – including these centers – are adhering to their designated scope of practice and operating transparently and free from deceptive practices.

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Pre-deliberative Draft Document for Internal Use Only

12/6/2023

- Today, DPH will issue guidance to licensed hospitals, clinics, physicians, nurses, and physician assistants reminding them of certain requirements under licensure related to providing complete care and information to patients, as well as reminding providers and the public of the process to submit complaints regarding concerns with care received, potential deceptive practices, or misleading information that affects consumers.
- We look forward to ongoing partnership with on this important topic.