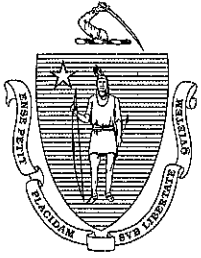


EXHIBIT 1



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

MAURA HEALEY
ATTORNEY GENERAL

TEL: (617) 727-2200
www.mass.gov/ago

July 19, 2022

BY OVERNIGHT MAIL

Attleboro Women's Health Center
Abundant Hope Pregnancy Resource Center
152 Emory Street Unit 4 Rear
Attleboro, MA 02703

Re: Potential Violations of the Massachusetts Civil Rights Act

Dear Sir/Madam:

Please be advised that the Civil Rights Division of the Office of the Attorney General has received complaints alleging that you and/or your employees or volunteers have engaged in a pattern or practice of civil rights violations, including by interfering, or attempting to interfere, with the exercise of the constitutionally protected right to access abortion care in Massachusetts. See Moe v. Sec'y of Admin. and Fin., 382 Mass. 629 (1981). In particular, we have received information alleging that you and/or your employees or volunteers have:

- Led pregnant people to believe that they could obtain abortion care at your organization and had made appointments for abortion services at your organization, even though you do not and cannot provide that service;
- Delayed scheduling appointments for pregnant people who requested abortion services so that they were past the point at which they could legally obtain an abortion by the time that they were seen by your organization and learned that you are a crisis pregnancy center and not an abortion provider;
- Made confusing, deceptive, and/or misleading statements about the availability of abortion services and medically accurate options counseling at your organization, and then harassed and intimidated people who attempted to access those services at your organization;
- Placed volunteers or employees wearing "official looking vests" in the driveway that abuts Four Women Health Services ("Four Women")—a healthcare facility that provides abortion services—to direct Four Women's patients to your organization, causing patients to experience stress, confusion, and undue delay in navigating to care;



- Attempted to prevent pregnant people from leaving your facility when they realized that they were in the wrong place or otherwise declined your services;
- Followed pregnant people who left your facility to go to Four Women, yelling at them “do not kill your baby” and attempting to intimidate, pressure, or shame them away from accessing abortion services;
- Deliberately misrepresented information about the safety and efficacy of abortion in order to confuse, scare, or deceive people into carrying unwanted pregnancies to term;¹
- Continued to harass pregnant people by phone or mail after they declined your services; and
- Harassed, intimidated, and/or threatened Four Women’s employees.

The Massachusetts Civil Rights Act prohibits interference or attempted inference by threats, intimidation, or coercion with the exercise or enjoyment of rights protected by the constitution or laws of the Commonwealth. G.L. c. 12, § 11H. To the extent you have interfered with the right of pregnant people in Massachusetts to access abortion care through conduct or tactics that are threatening, intimidating, or coercive, you and/or your employees or volunteers have violated the MCRA. Please be advised that violations of the Massachusetts Civil Rights Act can result in an award of compensatory damages for any aggrieved person or entity, litigation costs and reasonable attorneys’ fees, civil penalties up to \$5,000 per violation, and appropriate injunctive relief.

Accordingly, this letter constitutes a demand that you immediately cease and desist from engaging in this conduct. To the extent you continue to engage in this conduct, please be advised that the Office of the Attorney General may pursue appropriate legal action against you and any employees or volunteers who have engaged in this conduct.

Please contact me at amanda.hainsworth@mass.gov and (617) 963-2618 to further discuss this letter.

Sincerely,



Amanda Hainsworth
Assistant Attorney General
Managing Attorney
Civil Rights Division
Office of the Attorney General

¹ For example, your website falsely claims that medication abortions are reversible and includes an inaccurate recitation of the risks associated with abortion.

EXHIBIT 2

Mass.gov[\(1\) > Office of Attorney General Maura Healey \(/orgs/office-of-attorney-general-maura-healey\)](#)

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

MEDIA CONTACT

Jillian Fennimore**Phone**

(617) 727-2543 (tel:6177272543)

OnlineJillian.Fennimore@mass.gov (mailto:Jillian.Fennimore@mass.gov)

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 \(/service-details/crisis-pregnancy-centers-cpcs\)](/service-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 anti-abortion 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 licensed 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 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 \(/service-details/crisis-pregnancy-centers-cpcs\)](#) 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:Jillian.Fennimore@mass.gov)

Office of Attorney General Maura Healey (</orgs/office-of-attorney-general-maura-healey>)

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

More (</orgs/office-of-attorney-general-maura-healey>)



[All Topics \(/topics/massachusetts-topics\)](#)

[Site Policies \(/site-policies\)](#)

[Public Records Requests \(/topics/public-records-requests\)](#)

© 2022 Commonwealth of Massachusetts.

Mass.gov® is a registered service mark of the Commonwealth of Massachusetts. [Mass.gov Privacy Policy \(/privacypolicy\)](#)

Mass.gov[\(1\) > Office of Attorney General Maura Healey \(/orgs/office-of-attorney-general-maura-healey\)](#)

Crisis Pregnancy Centers (CPCs)

If you are pregnant and looking to understand your abortion options, you should consult with a licensed reproductive healthcare provider.

WARNING: CPCs do NOT provide comprehensive reproductive healthcare. CPCs are organizations that seek to prevent people from accessing abortion care.

- CPCs may appear to be reproductive health care clinics, but do **NOT** provide abortion care or abortion referrals, contraception, or other reproductive health care, despite what they may advertise.
- Most CPCs are **NOT** licensed medical facilities.
- CPCs are **NOT** typically staffed by licensed doctors or nurses, even though some people who work at CPCs may try to look the part, for example, by wearing a white coat.
- Some CPCs offer ultrasounds performed by unlicensed personnel who are not qualified to provide that service, which may lead to inaccurate or misleading results about a pregnancy.
- CPCs staffed by unlicensed personnel are **NOT** required to keep your medical records private.
- Unlicensed CPCs are **NOT** required to follow codes of ethics or standards of care that govern healthcare professions because they are not healthcare providers.
- CPCs often provide inaccurate and misleading information about abortion and the medical and mental health effects of abortion.
- CPCs often mislead people about how far they are into their pregnancy.
- CPCs often try to delay scheduling appointments to push people beyond the point at which they can obtain an abortion.

Do research and ask questions when scheduling an appointment to learn about your abortion options. Be aware of the warning signs.

- Look at the website and online reviews before making an appointment.
- Ask whether the center is licensed and will provide you with an abortion or a referral for abortion before you go to an appointment.
- Watch for these warning signs, including that the center:
 - Is listed as a pregnancy resource center, pregnancy help center, pregnancy care center, or women's resource center on CPC websites such as helpinyourarea.com/massachusetts.

- Advertises free pregnancy tests, abortion counseling, pre-abortion screenings, abortion education, but do not provide abortion or help you access abortion care elsewhere.
- Attempts to delay your appointment.
- Uses tactics to try to pressure you into continuing a pregnancy, for example, by providing small plastic fetus or baby clothes.
- For help finding a licensed reproductive healthcare provider, talk to your doctor or [check this list](#) (<https://abortioncarenewengland.org/providers>).
- When you arrive for your appointment, make sure you are in the right place. Many CPCs are located near clinics that provide abortion and use similar sounding names.

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](#) ([/how-to/file-a-civil-rights-complaint](#)) with our Civil Rights Division online or at 617-963-2917.

Share this information

We want all pregnant people seeking help to know that CPCs do not provide abortion care, and the information presented to you at these facilities about your options is often misleading and inaccurate. To help friends, family, neighbors, and others in your community recognize the warning signs of CPCs, the guidance above can be downloaded in multiple languages.

- [English](#) ([/doc/consumer-advisory-crisis-pregnancy-centers-english/download](#))
- [Español \(Spanish\)](#) ([/doc/aviso-al-consumidor-centros-de-crisis-de-embarazo-spanish/download](#))
- [Português \(Portuguese\)](#) ([/doc/aviso-ao-consumidor-centros-de-gravidez-em-crise-portuguese/download](#))
- [Kreyòl ayisyen \(Haitian Creole\)](#) ([/doc/avetisman-pou-kliyan-yo-sant-pou-fanm-ki-ansent-ki-an-difikilte-haitian-creole/download](#))
- [普通话 \(Mandarin\)](#) ([/doc/xiaofeizhegonggao-renshenweijichulizhongxin-mandarin/download](#))
- [Tiếng Việt \(Vietnamese\)](#) ([/doc/tu-van-nguoi-tieu-dung-trung-tam-ve-khung-hoang-mang-thai-vietnamese/download](#))



[All Topics](#) ([/topics/massachusetts-topics](#))

[Site Policies](#) ([/site-policies](#))

[Public Records Requests](#) ([/topics/public-records-requests](#))

© 2022 Commonwealth of Massachusetts.

Mass.gov® is a registered service mark of the Commonwealth of Massachusetts. [Mass.gov Privacy Policy](#) ([/privacypolicy](#))