

*Inefficiency and Ideology Within the Florida Pregnancy Support  
Services Program is Wasting Millions in Taxpayer Dollars*

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## Executive Summary

This report outlines the development of Florida Pregnancy Support Services Program alongside the history of funding for family planning services in Florida and explores Florida Pregnancy Care Network's (FPCN) history, staff, and board members. According to the *U.S. Centers for Disease Control and Prevention*, abortions have decreased in Florida since 2009.<sup>1</sup> Despite this, Florida funnels millions in taxpayer dollars to anti-abortion pregnancy centers that do not provide medical services. Instead, these centers promote inaccurate medical information and religious content on the taxpayer's dime. These same, highly reimbursed services are not subject to thorough oversight by the state.

When then-Governor Jeb Bush signed an executive order authorizing the creation of the Florida Pregnancy Support Services Program, he solidified funding for a program anti-abortion advocates had pursued for years: government monies for anti-abortion pregnancy centers. Florida is now one of fourteen states funding anti-abortion pregnancy centers with taxpayer dollars. Anti-abortion pregnancy centers can go by different names, including crisis pregnancy centers, pregnancy resource centers, life-conscious pregnancy centers, and fake clinics.

Since 2009, the Florida Legislature has allocated more than \$30 million to FPCN to manage the services with a goal of “solely promot[ing] childbirth.”<sup>2</sup> As state funding increased

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<sup>1</sup> See Figure 1. Karen Pazol, Andreea A. Creagna, Suzanne B. Zane, Kim D. Burley, and Denise J. Jamieson, *Abortion Surveillance – United States, 2009*, CENTERS FOR DISEASE CONTROL AND PREVENTION (Nov. 23, 2012), available at [https://www.cdc.gov/mmwr/preview/mmwrhtml/ss6108a1.htm?s\\_cid=ss6108a1\\_w](https://www.cdc.gov/mmwr/preview/mmwrhtml/ss6108a1.htm?s_cid=ss6108a1_w); Karen Pazol, Andreea A. Creagna, Kim D. Burley, Brenda Hayes, and Denise J. Jamieson, *Abortion Surveillance – United States, 2010*, CENTERS FOR DISEASE CONTROL AND PREVENTION (Nov. 29, 2013), available at [https://www.cdc.gov/mmwr/preview/mmwrhtml/ss6208a1.htm?s\\_cid=ss6208a1\\_w](https://www.cdc.gov/mmwr/preview/mmwrhtml/ss6208a1.htm?s_cid=ss6208a1_w); Karen Pazol, Andreea A. Creagna, Kim D. Burley, and Denise J. Jamieson, *Abortion Surveillance – United States, 2011*, CENTERS FOR DISEASE CONTROL AND PREVENTION (Nov. 28, 2014), available at [https://www.cdc.gov/mmwr/preview/mmwrhtml/ss6311a1.htm?s\\_cid=ss6311a1\\_w](https://www.cdc.gov/mmwr/preview/mmwrhtml/ss6311a1.htm?s_cid=ss6311a1_w); Karen Pazol, Andreea A. Creagna, and Denise J. Jamieson, *Abortion Surveillance – United States, 2012*, CENTERS FOR DISEASE CONTROL AND PREVENTION (Nov. 27, 2015), available at [https://www.cdc.gov/mmwr/preview/mmwrhtml/ss6410a1.htm?s\\_cid=ss6410a1\\_e](https://www.cdc.gov/mmwr/preview/mmwrhtml/ss6410a1.htm?s_cid=ss6410a1_e); Tara C. Jatlaoui, Alexander Ewing, Michele G. Mandel, Katharine B. Simmons, Danielle B. Suchdev, Denise J. Jamieson, and Karen Pazol, *Abortion Surveillance – United States, 2013*, CENTERS FOR DISEASE CONTROL AND PREVENTION (Nov. 25, 2016), available at <https://www.cdc.gov/mmwr/volumes/65/ss/ss6512a1.htm>; Tara C. Jatlaoui, Jill Shah, Michele G. Mandel, Jamie W. Krashin, Danielle B. Suchdev, Denise J. Jamieson, and Karen Pazol, *Abortion Surveillance – United States, 2014 Supplemental*, CENTERS FOR DISEASE CONTROL AND PREVENTION (Nov. 23, 2018) available at [https://www.cdc.gov/mmwr/volumes/66/ss/ss6624a1.htm?s\\_cid=ss6624a1\\_w](https://www.cdc.gov/mmwr/volumes/66/ss/ss6624a1.htm?s_cid=ss6624a1_w); Tara C. Jatlaoui, Maegan E. Boutot, Michele G. Mandel, Maura K. Whiteman, Angeline Ti, Emily Petersen, and Karen Pazol, *Abortion Surveillance – United States, 2015*, CENTERS FOR DISEASE CONTROL AND PREVENTION (Nov. 23, 2018), available at <https://www.cdc.gov/mmwr/volumes/67/ss/ss6713a1.htm>.

<sup>2</sup> Total is \$33,983,611 according to the Florida Accountability Contract Tracking System. See Total Budgetary Amount, *Grant Disbursement Information for Contract COH5P between Pregnancy Support Services Program and Department of Health*, FLORIDA ACCOUNTABILITY CONTRACT TRACKING SYSTEM (Jul. 1, 2009 to Jun. 30, 2013), available at <https://facts.fldfs.com/Search/ContractDetail.aspx?AgencyId=640000&ContractId=COH5P>; Total Budgetary Amount, *Grant Disbursement Information for Contract COHD2 between Pregnancy Support Services Program and Department of Health*, FLORIDA ACCOUNTABILITY CONTRACT TRACKING SYSTEM (Jul. 1, 2013 to Jun. 30, 2017), available at <https://facts.fldfs.com/Search/ContractDetail.aspx?AgencyId=640000&ContractId=COHD2>;

to the program, the Florida Department of Health has relaxed related reporting requirements.<sup>3</sup> While Florida generously funds Florida Pregnancy Support Services Program, it does not fund comprehensive family planning services through this program. State funding for the program includes legislative allocations from a trust allocated for rape crisis centers in Florida, but subcontractors do not advertise providing crisis rape services.

Most service providers attached to this program are anti-abortion pregnancy centers, which advertise providing options and reproductive health services. Of the 56 subcontractors, only 2 provide health and wellness services. Fifty-six subcontractors administer these services, which include “counseling” and pregnancy tests. Emphasis is placed on providing counseling that promotes childbirth or postpartum counseling with only two subcontractors contractually obligated to provide health and wellness services.

Contrary to the mandate prohibiting religious bias in the delivery of services, many of the subcontractors affiliated with this program are religious entities. They require volunteers – which can make up the majority of the center’s workforce – to submit statements of Christian faith, even requiring referrals from a pastor of their church, prior to volunteering with the center. Many subcontractors promote dangerous medical misinformation on their websites, including the scientifically unsound “abortion pill reversal” method. This, despite a 2019 study of “abortion pill reversal” being halted after participants experienced extreme vaginal bleeding.

FPCN, a Tallahassee-based anti-abortion organization, has managed the program since its inception. This network’s executive director and board members use hate speech and promote themes of prejudice and discrimination on their social media accounts. Many are affiliated with conservative and right-wing religious entities.

Until taxpayers can be assured that these centers conform to ethical standards of licensed medical facilities, offer sound medical advice, and do not lead to harm, the state of Florida should refrain from directly or indirectly funding anti-abortion pregnancy centers.

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Total Budgetary Amount, *Grant Disbursement Information for Contract COHN6 between Pregnancy Support Services Program and Department of Health*, FLORIDA ACCOUNTABILITY CONTRACT TRACKING SYSTEM (Jul. 1, 2017 to Jun. 30, 2021), available at <https://facts.fldfs.com/Search/ContractDetail.aspx?AgencyId=640000&ContractId=COHN6>.

<sup>3</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>; Florida Pregnancy Support Services Program, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 3, 2013), available at <https://beta.documentcloud.org/documents/20412915-cn-640000-cohd2>; Florida Pregnancy Support Services Program, *Contract #COH5P*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 16, 2009), available at <https://beta.documentcloud.org/documents/20412911-cn-640000-coh5p>.

## Florida Pregnancy Support Services Program

Former Florida Governor Jeb Bush initiated the Florida Pregnancy Support Services Program through executive order in 2004 as Florida's "Alternative to Abortion" program. The order authorized the use of public funds for anti-abortion pregnancy centers that push people away from obtaining abortion care.

### *History of Anti-Abortion Pregnancy Centers*

Beginning in the 1960s, the anti-abortion movement founded what they called "crisis pregnancy centers" in response to the widespread legalization of abortion access.<sup>4</sup> The movement established these centers across the country to entice pregnant people seeking abortions to enter their doors where employees or volunteers try to convince them to forgo the intended procedure.<sup>5</sup> Anti-abortion pregnancy centers sometimes offer some version of health care services including ultrasounds, pregnancy tests, and testing for sexually transmitted diseases, but administration of these services is not their primary mission.<sup>6</sup> Many advocates, lawmakers, and public officials who support reproductive rights have concluded that these centers purposefully mislead people in violation of state laws.<sup>7</sup>

Anti-abortion advocates claim that Robert Pearson, a homebuilder, set up the first such center in Hawaii in 1967.<sup>8</sup> After the Supreme Court affirmed the right to abortion in 1973, the anti-abortion movement expanded its efforts to set up these centers designed to divert pregnant people away from medical clinics that provide abortion care.<sup>9</sup>

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<sup>4</sup> Jane Gross, *Pregnancy Centers: Anti-Abortion Role Challenged*, THE NEW YORK TIMES (Jan. 23, 1987), available at <https://www.nytimes.com/1987/01/23/nyregion/pregnancy-centers-anti-abortion-role-challenged.html>.

<sup>5</sup> Mary Tuma, *Crisis Pregnancy Centers: Money for Nothing*, THE AUSTIN CHRONICLE (Jul. 20, 2018), available at <https://www.austinchronicle.com/news/2018-07-20/crisis-pregnancy-centers-money-for-nothing/>; *The Truth about Crisis Pregnancy Centers*, NARAL Pro-Choice America (Dec. 6, 2016), available at <https://www.prochoiceamerica.org/wp-content/uploads/2016/12/6.-The-Truth-About-Crisis-Pregnancy-Centers.pdf>.

<sup>6</sup> *Crisis Pregnancy Centers Offer Misleading Information on Abortion Risk*, GUTTMACHER INSTITUTE (Jul. 2006), available at <https://www.guttmacher.org/article/2006/07/crisis-pregnancy-centers-offer-misleading-information-abortion-risks>.

<sup>7</sup> Tom Bowman, *Crisis Pregnancy Centers Accused of Misleading Women Seeking Abortions*, THE BALTIMORE SUN (Jul. 25, 1991), available at <https://www.baltimoresun.com/news/bs-xpm-1991-07-25-1991206027-story.html>; Joanne D. Rosen, *The Public Health Risks of Crisis Pregnancy Centers*, PERSPECTIVES ON SEXUAL AND REPRODUCTIVE HEALTH, Volume 44, Issue 3 (Sep. 10, 2012), available at <https://www.guttmacher.org/journals/psrh/2012/09/public-health-risks-crisis-pregnancy-centers>; Jane Gross, *Pregnancy Centers: Anti-Abortion Role Challenged*, THE NEW YORK TIMES (Jan. 23, 1987), available at <https://www.nytimes.com/1987/01/23/nyregion/pregnancy-centers-anti-abortion-role-challenged.html>.

<sup>8</sup> Judith Davidoff, *Pregnant? Scared?*, ISTHMUS (Jan. 31, 2013), available at <https://isthmus.com/news/news/pregnant-scared-abortion-risks-are-exaggerated-at-wisconsin-crisis-pregnancy-centers/>; *Crisis Pregnancy Centers: An Affront to Choice*, NATIONAL ABORTION FEDERATION (2006), available at [http://prochoice.org/wp-content/uploads/cpc\\_report.pdf](http://prochoice.org/wp-content/uploads/cpc_report.pdf).

<sup>9</sup> *Crisis Pregnancy Centers: An Affront to Choice*, NATIONAL ABORTION FEDERATION (2006), available at [http://prochoice.org/wp-content/uploads/cpc\\_report.pdf](http://prochoice.org/wp-content/uploads/cpc_report.pdf).

For several decades, anti-abortion pregnancy centers survived by raising funds from religious donors and churches. After establishing the first center in Hawaii, Mr. Pearson started the Pearson Foundation in 1969 in St. Louis, Missouri to promote similar centers nationally.<sup>10</sup> An early manual published by the foundation instructed centers to lie about their true purpose.<sup>11</sup> The manual explained that anti-abortion pregnancy centers should employ dual names and separate marketing materials with one brand intended to “draw abortion-bound women” and another to attract donors.<sup>12</sup> Several state attorneys general investigated these centers and found that this dual structure was set up to mislead people and violated consumer protection laws.<sup>13</sup>

By 1985, Birthright – a Toronto-based network of anti-abortion pregnancy centers claiming to be the oldest in North America – claimed a network of more than 600 centers throughout the continent.<sup>14</sup> At the time, Alternatives to Abortion International listed 1,500 operating centers.<sup>15</sup> Growth exploded throughout the decade. In 1989, *Newsday* reported that 4,000 centers existed in the United States.<sup>16</sup> The industry is dominated by a few national players, including Heartbeat International and Care Net, each of which claim thousands of affiliates.<sup>17</sup> These centers are typically organized around religious principles and pay for their operations by raising money from private donors, foundations, and churches.<sup>18</sup> Despite investigations by state officials, anti-abortion pregnancy centers continue to employ the same misleading tactics they have used for decades.<sup>19</sup> They often locate their centers as close as possible to real medical clinics that provide legitimate health care

## Reach Them

Women in our city are searching the Internet every day for abortion services. Verity Pregnancy and Medical Resource Center uses an outreach website and online advertising to reach the women most vulnerable – or even determined – to get an abortion. When they schedule appointments with our Center, we can offer them not only an introduction to their unborn child on an ultrasound screen but also the truth about abortion at an emotional, spiritual, psychological and/or physical level. In other words, we show them truth!

Screenshot from donor website of Verity in Fort Myers (veritypmc.com/about-us-4)

<sup>10</sup> Jane Gross, *Pregnancy Centers: Anti-Abortion Role Challenged*, THE NEW YORK TIMES (Jan. 23, 1987), available at <https://www.nytimes.com/1987/01/23/nyregion/pregnancy-centers-anti-abortion-role-challenged.html>.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> Clara Germani, *Pro-life Groups Open Own Clinics to Offer Alternatives to Abortion*, THE CHRISTIAN SCIENCE MONITOR (Jul. 18, 1985), available at <https://www.csmonitor.com/1985/0718/ababy.html>.

<sup>15</sup> *Id.*

<sup>16</sup> Mark Lowery, *Abortion in America. Focus on the City; An Alternative That's Not Always Made Clear*, NEWSDAY, April 25, 1989.

<sup>17</sup> *Our Story*, HEARTBEAT INTERNATIONAL (last accessed Nov. 17, 2020), available at <https://www.heartbeatinternational.org/about/our-story>; *Affiliation*, CARE NET (last accessed Nov. 17, 2020), available at <https://www.care-net.org/affiliation>.

<sup>18</sup> *Financial Accountability*, HEARTBEAT INTERNATIONAL (last accessed Nov. 17, 2020), available at <https://www.heartbeatinternational.org/about/financial-accountability>; *Financial Information*, CARE NET (last accessed Nov. 17, 2020), available at <https://www.care-net.org/financial-information>.

<sup>19</sup> Jane Gross, *Pregnancy Centers: Anti-Abortion Role Challenged*, THE NEW YORK TIMES (Jan. 23, 1987), available at <https://www.nytimes.com/1987/01/23/nyregion/pregnancy-centers-anti-abortion-role-challenged.html>.

services. They advertise in the same places as abortion providers and use innocuous language to lead pregnant people to believe they also provide abortions.

Anti-abortion pregnancy centers have updated their tactics for the digital age. For instance, they maintain dual websites: a secular site to appeal to pregnant people and a religious one to appeal to their donors and supporters.<sup>20</sup> Centers have also hired digital advertising firms to push geotargeted ads at people who enter abortion clinics.<sup>21</sup> The Massachusetts Attorney General concluded that this tactic violated consumer protection laws and forced one advertising firm to forgo this approach in Massachusetts.<sup>22</sup>

Anti-abortion pregnancy centers around the country began pursuing government funding in the late 1990s after Pennsylvania funded a network of centers through the first Alternative to Abortion Program, Project Women in Need. States attempt to offer parenting assistance and material goods through an Alternative to Abortion Program by granting money to organizations that promote childbirth, but often these states settle for granting money to anti-abortion pregnancy centers that manipulate pregnant people from accessing the care they seek. As of 2019, 14 states fund anti-abortion pregnancy centers through some variation of an Alternative to Abortion Program.<sup>23</sup> Through increased political involvement and advocacy, using affiliations with national organizations, they have secured more government funding across the United States at the state and federal level.<sup>24</sup> Fourteen states fund anti-abortion pregnancy centers through various versions of the alternative-to-abortion programs,<sup>25</sup> while more than 3,700 centers operate across the U.S.<sup>26</sup> Currently there are 192 centers operating in Florida.<sup>27</sup>

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<sup>20</sup> Letter to Honorable Mike DeWine, *Requires for Investigation Into Marketing Practices of Crisis Pregnancy Centers*, CAMPAIGN FOR ACCOUNTABILITY (Jun. 5, 2018), available at <https://campaignforaccountability.org/work/letter-calling-on-ohio-attorney-general-to-investigate-state-funded-fake-abortion-clinics-for-misleading-women/>.

<sup>21</sup> Nate Raymond, *Firm Settles Massachusetts Probe Over Anti-Abortion Ads Sent to Phone*, REUTERS (Apr. 5, 2017), available at <https://www.reuters.com/article/us-massachusetts-abortion/firm-settles-massachusetts-probe-over-anti-abortion-ads-sent-to-phones-idUSKBN1761PX>.

<sup>22</sup> Press Release, *AG Reaches Settlement with Advertising Company Prohibiting 'Geofencing' Around Massachusetts Healthcare Facilities*, OFFICE OF ATTORNEY GENERAL MAURA HEALEY (Apr. 4, 2017), available at <https://www.mass.gov/news/ag-reaches-settlement-with-advertising-company-prohibiting-geofencing-around-massachusetts>.

<sup>23</sup> Sarah Moore, *14 States Funnel Millions of Public Dollars to Fake Abortion Clinics*, PORTSIDE (Jul. 20, 2019), available at <https://portside.org/2019-07-20/14-states-funnel-millions-public-dollars-fake-abortion-clinics>.

<sup>24</sup> Victoria Lin and Cynthia Dailard, *Crisis Pregnancy Centers Seek to Increase Political Clout, Secure Government Subsidy*, GUTTMACHER INSTITUTE (May 1, 2002), available at <https://www.guttmacher.org/gpr/2002/05/crisis-pregnancy-centers-seek-increase-political-clout-secure-government-subsidy>.

<sup>25</sup> Crisis Pregnancy Centers, *Legislative Tracker*, REWIRE NEWS GROUP (Sep. 12, 2018), available at <https://rewire.news/legislative-tracker/law-topic/crisis-pregnancy-centers/>.

<sup>26</sup> Swartzendruber A, Lambert DN. A Web-Based Geolocated Directory of Crisis Pregnancy Centers (CPCs) in the United States: Description of CPC Map Methods and Design Features and Analysis of Baseline Data. *JMIR Public Health Surveill.* 2020;6(1):e16726. Published 2020 Mar 27. doi:10.2196/16726.

<sup>27</sup> *Fake Clinic Work Group*, FLORIDIANS FOR REPRODUCTIVE FREEDOM (last accessed Jan. 12, 2020), available at <https://floridareprofreedom.org/fakeclinics/>.

## History of Family Planning in Florida

### *Florida Anti-Abortion Funding History*

As the Florida Department of Health notes, comprehensive family planning services decrease the rate of unintended pregnancies and the incidence of abortion. Still, on November 4, 2004, then-Governor Jeb Bush signed an executive order bringing Florida Pregnancy Support Services Program to fruition.<sup>28</sup> Florida first allocated state funding to the program through the 2006 state budget via the funding allocated to the Department of Health (DOH).<sup>29</sup> The same year, Florida Pregnancy Care Network was contracted to manage the program.<sup>30</sup>

The Florida Legislature allocated funding for the program in the state budget for the first time in 2006 at \$2 million.<sup>31</sup> Allocations continued at a rate of \$2 million per year, until funding was increased to \$4 million in 2015.<sup>32</sup> Funding remains at \$4 million per year.<sup>33</sup>

From 2011 to 2019, \$1.5 million to \$2 million of the Florida Pregnancy Support Services Program's allocation came from the state's rape crisis program trust fund. This fund was created within DOH "for the purpose of providing funds for rape crisis centers in the state." **Despite rape crisis funds being funneled to the Florida Pregnancy Support Services Program, none of its local programs or the network that oversees it promote, nor seem capable of, providing rape crisis services.** Former Governor Rick Scott vetoed additional funding for Florida's Rape Crisis Centers in 2014.<sup>34</sup> The Florida Council Against Sexual Violence, Inc. is currently contracted with the State to oversee the network of rape crisis centers. These centers are required to have an independent on-site review every other year to ensure compliance. Services at a rape crisis center can include forensic exams, support groups, and therapy, services that are far more advanced than those provided at anti-abortion pregnancy centers.

<sup>28</sup> 'Faith-based' Pregnancy Centers Get Fla. State Funding, AMERICANS UNITED FOR SEPARATION OF CHURCH AND STATE (Oct. 2010), available at <https://www.au.org/church-state/october-2010-church-state/au-bulletin/faith-based-pregnancy-centers-get-fla-state>.

<sup>29</sup> <http://laws.flrules.org/2006/25> pg. 105

<sup>30</sup> 'Faith-based' Pregnancy Centers Get Fla. State Funding, AMERICANS UNITED FOR SEPARATION OF CHURCH AND STATE (Oct. 2010), available at <https://www.au.org/church-state/october-2010-church-state/au-bulletin/faith-based-pregnancy-centers-get-fla-state>.

<sup>31</sup> House Bill No. 5001, 105 (2006), <http://laws.flrules.org/2006/25>; Senate Bill 2800, 109 (2007), <https://www.flsenate.gov/Session/Bill/2007/2800/BillText/er/PDF>; House Bill No. 5001, 93 (2008), <http://laws.flrules.org/2008/152>; Senate Bill 2600, 93 (2009), <https://www.flsenate.gov/Session/Bill/2009/2600/BillText/er/PDF>; House Bill 5001, 98 (2010), <https://www.flsenate.gov/Session/Bill/2010/5001/BillText/er/PDF>; Senate Bill 2000, 83 (2011), <https://www.flsenate.gov/Session/Bill/2011/2000/BillText/er/PDF>; Senate Bill 5001 (2012), <https://www.flsenate.gov/Session/Bill/2012/5001/BillText/er/HTML>; Senate Bill 1500 (2013), <https://www.flsenate.gov/Session/Bill/2013/1500/BillText/er/HTML>; Senate Bill 5001 (2014), <https://www.flsenate.gov/Session/Bill/2014/5001/BillText/er/HTML>.

<sup>32</sup> Senate Bill No. 2500, 101, (2015), [http://laws.flrules.org/files/Ch\\_2015-232.pdf](http://laws.flrules.org/files/Ch_2015-232.pdf).

<sup>33</sup> Senate Bill N. 5001 (2016), <https://www.flsenate.gov/Session/Bill/2016/5001/BillText/er/HTML>; Senate Bill 2500 (2017), <https://www.flsenate.gov/Session/Bill/2017/2500/BillText/er/HTML>; Senate bill 5001 (2018), <https://www.flsenate.gov/Session/Bill/2018/5001/BillText/er/HTML>; Senate Bill 2500 (2019), <https://www.flsenate.gov/Session/Bill/2019/2500/BillText/er/HTML>; Senate Bill 5001 (2020), <https://www.flsenate.gov/Session/Bill/2020/5001/BillText/er/HTML>.

<sup>34</sup> Phoenix Network, Gov. Scott vetoes Rape Crises Center Funding, PHOENIX NETWORK (Apr. 27 2012).

Despite lax State requirements, the Florida Pregnancy Support Services Program continuously receives more funding through the state legislature's budget. This stands in stark contrast to how the Florida government handles comprehensive family planning funding, which has stringent requirements and is primarily funded through federal Title X funds. Family planning services consist of "access to FDA-approved contraceptive methods," pregnancy testing and options counseling, and preventative services, such as "screening for hypertension, breast and cervical cancer, and sexually transmitted diseases, including HIV."<sup>35</sup> As noted by the Florida Department of Health, comprehensive family planning services, like contraception and preventative care, prevents the rate of unintended pregnancy, which "reduces the incidence of abortion."<sup>36</sup>

Family planning funding in Florida has relied primarily on the federal government, specifically the Title X Family Planning Program: a federal grant program to provide comprehensive family planning services and preventative health care.<sup>37</sup> President Richard Nixon signed the Title X program into law in 1970,<sup>38</sup> and for 50 years it has been the only federally funded program solely dedicated to funding family planning services for uninsured or underinsured people and people with no or low incomes.<sup>39</sup>

Title X grantees are subject to federal scrutiny and are required to report patient socioeconomic information as well as data on services performed. Patient socioeconomic information includes:

- Age Group
- Sex of Family Planning Users
- Race
- Ethnicity
- Income level
- Health insurance coverage status
- Language<sup>40</sup>

Title X recipients are required to report the services they provide to family planning users. Services include a range of hormonal contraception, sterilization, abstinence education, and

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<sup>35</sup> *Family Planning*, FLORIDA HEALTH (last accessed Nov. 17, 2020), available at <http://www.floridahealth.gov/programs-and-services/womens-health/family-planning/index.html>.

<sup>36</sup> *Id.*

<sup>37</sup> *What is Title X? An Explainer*, PHYSICIANS FOR REPRODUCTIVE HEALTH (last accessed Nov. 17, 2020), available at <https://prh.org/what-is-title-x-an-explainer/>.

<sup>38</sup> Family, Planning Services and Population Research Act of 1970. US Public Law 91-572, 84 Stat. 1504 (1970) available at <https://uscode.house.gov/statutes/pl/91/572.pdf>; Bailey MJ. Fifty Years of Family Planning: New Evidence on the Long-Run Effects of Increasing Access to Contraception. *Brookings Pap Econ Act.* 2013; 2013:341-409. doi:10.1353/eca.2013.0001.

<sup>39</sup> *Fact Sheet: Title X*, NATIONAL FAMILY PLANNING & REPRODUCTIVE HEALTH ASSOCIATION (Oct. 2020), available at <https://www.nationalfamilyplanning.org/file/documents---policy--communication-tools/Title-X-101-Fall-2020.pdf>.

<sup>40</sup> Office of the Assistant Secretary for Health & Office of Population Affairs, *Title X Family Planning Annual Report: Forms and Instructions*, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES (Jan. 2021), available at <https://opa.hhs.gov/sites/default/files/2021-01/fpar-forms-instructions-reissued-jan-2021.pdf>.

pregnancy testing. Title X recipients can perform cervical and breast cancer screenings, in addition to sexually transmitted disease and sexually transmitted infection testing.<sup>41</sup>

Title X funds are awarded directly to organizations that provide comprehensive family planning services and to local and state governments.<sup>42</sup> Florida DOH was the only Title X grant recipient in Florida until March 2017, when Community Health Centers, Inc. and Planned Parenthood of South Florida and the Treasure Coast, Inc. became additional recipients.<sup>43</sup> Current Title X grantees are DOH, funding 142 health centers, Primary Care Medical Services of Poinciana, Inc. and Community Health Centers of Pinellas, Inc., together funding 15 federally qualified health centers that offer family planning and sexual health services.<sup>44</sup> Planned Parenthood of Southwest and Central Florida and Planned Parenthood of South, East and North Florida were forced to leave the Title X program due to the Trump administration's domestic gag rule - a rule prohibiting Title X grant recipients from referring patients for abortion care, even if the patient requests it.<sup>45</sup> The Florida Department of Health currently receives \$11.2 million in Title X grants, making up the majority of Florida's Title X funding. Primary Care Medical Services of Poinciana, Inc. and Community Health Centers of Pinellas, Inc. both receive \$300,000 respectively.<sup>46</sup>

In addition to Title X funds, Florida's Agency for Health Care Administration (AHCA) and DOH implemented the Family Planning Waiver (FPW) program in October 1998 to provide comprehensive family planning services. The program aimed to provide family planning services to women ages 14-55 losing Medicaid coverage who have family income below 185 percent of the Federal poverty level.<sup>47</sup> Women are eligible for FPW coverage up to two years, subject to an annual redetermination.<sup>48</sup> In 2018, 48 percent of births of Florida were funded by Medicaid. Currently in Florida there are 703,008 "women of reproductive age" that are uninsured, and

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<sup>41</sup> *Id.*

<sup>42</sup> Key Facts About Title X, *Title X*, NATIONAL FAMILY PLANNING & REPRODUCTIVE HEALTH ASSOCIATE (last accessed Nov. 18, 2020), available at [https://www.nationalfamilyplanning.org/title-x\\_title-x-key-facts](https://www.nationalfamilyplanning.org/title-x_title-x-key-facts).

<sup>43</sup> Office of Population Affairs, *Title X Family Planning Director of Grantees*, UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES (Mar. 2017), available at <https://opa.hhs.gov/sites/default/files/2020-07/Title-X-Directory-March-2017.pdf>

<sup>44</sup> Florida, *Title X's Role*, NATIONAL FAMILY PLANNING & REPRODUCTIVE HEALTH ASSOCIATION (Jul. 2020), available at [https://www.nationalfamilyplanning.org/file/2020-state-one-pagers-new/state-facts-try-3/State-Facts-2020-3\\_FL.pdf](https://www.nationalfamilyplanning.org/file/2020-state-one-pagers-new/state-facts-try-3/State-Facts-2020-3_FL.pdf).

<sup>45</sup> *Bad News for Women in Florida and Nationwide Planned Parenthood Leaves Federal Family Planning Program*, NEWS TALK FLORIDA (Aug. 20, 2020), available at <https://www.newstalkflorida.com/featured/bad-news-for-women-in-florida-and-nationwide-planned-parenthood-leaves-federal-family-planning-program/>; Damien Filer, *Florida Planned Parenthood Denounces Trump Administration's Title X Gag Rule*, PLANNED PARENTHOOD ACTION (Feb. 22, 2019), available at <https://www.plannedparenthoodaction.org/florida-alliance-planned-parenthood-affiliates/press-releases/florida-planned-parenthood-denounces-trump-administrations-title-x-gag-rule>.

<sup>46</sup> Florida, *Title X's Role*, NATIONAL FAMILY PLANNING & REPRODUCTIVE HEALTH ASSOCIATION (Jul. 2020), available at [https://www.nationalfamilyplanning.org/file/2020-state-one-pagers-new/state-facts-try-3/State-Facts-2020-3\\_FL.pdf](https://www.nationalfamilyplanning.org/file/2020-state-one-pagers-new/state-facts-try-3/State-Facts-2020-3_FL.pdf).

<sup>47</sup> *Florida Medicaid Family Planning Waiver*, MEDICAID.GOV (Aug. 30, 2011), available at <https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/fl/fl-family-planning-fs.pdf>.

<sup>48</sup> *Medicaid Family Planning Waiver Program*, FLORIDA AGENCY FOR HEALTH CARE ADMINISTRATION (last accessed Nov. 18, 2020), available at [https://ahca.myflorida.com/Medicaid/Family\\_Planning/index.shtml](https://ahca.myflorida.com/Medicaid/Family_Planning/index.shtml).

1,750,000 “women of reproductive age” have household incomes at or below 250 percent of the federal poverty level.<sup>49</sup>

The FPW program was set to expire on December 31, 2013.<sup>50</sup> In June 2013, the federal Centers for Medicare and Medicaid Services issued Florida an automatic one-year temporary extension for the FPWs.<sup>51</sup> FPW has since been extended and renewed – most recently through June 30, 2023.<sup>52</sup> The program covers services and supplies directly related to family planning, including:

- Family planning examinations;
- Family planning counseling;
- Approved methods of contraception;
- Sexually transmitted infection (STI) testing;
- Sexually transmitted disease (STD) testing;
- Pap smears and pelvic exams;
- Approved sterilizations;
- Colposcopies;
- Various methods of contraception and other family planning pharmaceuticals;
- Service provider supplies.<sup>53</sup>

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<sup>49</sup> Florida, *Title X's Role*, NATIONAL FAMILY PLANNING & REPRODUCTIVE HEALTH ASSOCIATION (Jul. 2020), available at [https://www.nationalfamilyplanning.org/file/2020-state-one-pagers-new/state-facts-try-3/State-Facts-2020-3\\_FL.pdf](https://www.nationalfamilyplanning.org/file/2020-state-one-pagers-new/state-facts-try-3/State-Facts-2020-3_FL.pdf).

<sup>50</sup> *Florida Medicaid Family Planning Waiver*, MEDICAID.GOV (Aug. 30, 2011), available at <https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/fl/fl-family-planning-fs.pdf>.

<sup>51</sup> *Florida Medicaid Family Planning Waiver, 3<sup>rd</sup> Quarter Report January 1, 2016 – March 31, 2016*, MEDICAID.GOV (2016), available at <https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/fl/Medicaid-Family-Planning-Waiver/fl-family-planning-qtrly-rpt-jan-mar-2016.pdf>.

<sup>52</sup> *Florida Medicaid Family Planning Waiver, Waiver Dates*, Medicaid.gov (last accessed Nov. 19, 2020), available at <https://www.medicaid.gov/medicaid/section-1115-demo/demonstration-and-waiver-list/81301>.

<sup>53</sup> *Medicaid Family Planning Waiver Program*, FLORIDA AGENCY FOR HEALTH CARE ADMINISTRATION (last accessed Nov. 18, 2020), available at [https://ahca.myflorida.com/Medicaid/Family\\_Planning/index.shtml](https://ahca.myflorida.com/Medicaid/Family_Planning/index.shtml).

## Florida Pregnancy Care Network Subcontractors

From 2017 to 2018, Florida Pregnancy Care Network reported distributing funds to 56 organizations: three Catholic charities, six churches of a variety of Christian faiths offering pregnancy resources and adoption counseling, seven organizations provide housing to pregnant people without housing - five of which are religiously affiliated - and 40 anti-abortion pregnancy centers.<sup>54</sup>

Contracts between DOH and FPCN present a number of issues, including exorbitant reimbursement rates for the quality of services provided by subcontractors, lack of public data on the number of people served, self-monitoring by subcontractors, and a total lack of wellness services.<sup>55</sup> Additionally, an analysis of materials directly distributed by subcontractors found innumerable instances of the subcontractors spreading disinformation and incorrect medical information, as well as proselytizing to individuals seeking services.

### *Current Program Requirements*

DOH contracts with FPCN for funding distribution, requiring the network to provide services for the Florida Pregnancy Support Services Program. The program objective is to provide “pregnancy support and women wellness services through subcontracted providers... by promoting and encouraging childbirth,” according to a contract signed on June 30, 2017 for services rendered July 1, 2017 to June 30, 2018 (2017-18 contract) . That contract has now been extended to June 2021.<sup>56</sup> The network attempts to achieve this objective by subcontracting with a minimum of 45 Florida anti-abortion pregnancy centers. The services subcontractors are allowed to provide are limited. Subcontractors providing services are required to “solely promote and support childbirth.” Services cannot “include religious content.”<sup>57</sup>

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<sup>54</sup> Florida Pregnancy Care Network, Inc., *FY 17/18 Return of Organization Exempt from Income Tax Form 990*, Schedule I, Part II (Jan. 15, 2020) available at <https://projects.propublica.org/nonprofits/organizations/203707766/202040359349300924/full>.

<sup>55</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>; Florida Pregnancy Support Services Program, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 3, 2013), available at <https://beta.documentcloud.org/documents/20412915-cn-640000-cohd2>; Florida Pregnancy Support Services Program, *Contract #COH5P*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 16, 2009), available at <https://beta.documentcloud.org/documents/20412911-cn-640000-coh5p>.

<sup>56</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC., 8 (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>; Florida Pregnancy Care Network and State of Florida Department of Health, *Contract COHN6: Renewal #1*, STATE OF FLORIDA DEPARTMENT OF HEALTH (Jun. 4, 2018), available at <https://beta.documentcloud.org/documents/20412975-cn-640000-cohn6-r1>; Florida Pregnancy Care Network and State of Florida Department of Health, *Contract COHN6: Renewal #2*, STATE OF FLORIDA DEPARTMENT OF HEALTH (Jun. 28, 2019), available at <https://beta.documentcloud.org/documents/20412976-cn-640000-cohn6-renewal2-2019>; Division of Community Health Promotion, *Contract # COHN6: Contract Summary*, DIVISION OF COMMUNITY HEALTH PROMOTION (Jun. 30, 2020), available at <https://beta.documentcloud.org/documents/20412974-cn-640000-cohn6-r3a1>.

<sup>57</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at

When a client enters a center funded through this program, the primary service received is “pregnancy counseling.” If a person entering a center thinks they are pregnant a pregnancy test is done. If the pregnancy test is negative, the subcontractor is to perform “lifestyle counseling.” The contract does not explain or detail the standards or requirements of lifestyle counseling. Clients with a positive pregnancy tests are to receive:

- Counseling with the goal of childbirth
- Postpartum counseling, including a plan for the client on goals for having and not having children. “This includes baby spacing and management of pregnancy risk factors such as diabetes, high blood pressure, and obesity.”

If a client enters a subcontractor facility with a family member or partner, the family or partner must also receive counseling with a goal of childbirth. Additionally, subcontractors are not required to provide education classes but are to ensure any education classes that are provided include childbirth education, parenting education, and personal finance management services.

The contract requires creation and promotion of OptionLine, a hotline and texting campaign promoting the program. The network is required to ensure the call center is staffed at all times to speak to those “facing unplanned pregnancies and other related concerns.” OptionLine operators consult with and direct callers to a network subcontractor. Numerous details must be reported to DOH for quality assurance. Despite the reporting required, the state does not have a target number of callers or visits for the network to hit.

### *Reimbursement Rates*

DOH reimburses Florida Pregnancy Care Network for direct client services provided by its subcontractors. According to a contract signed June 30, 2017, “direct client services” includes counseling, referrals, and classes and authorized services until June 30, 2018.<sup>58</sup> DOH renewed the contract three times, extending the expiration date of the contract to 2021.<sup>59</sup>

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<https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>; Florida Pregnancy Support Services Program, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 3, 2013), available at <https://beta.documentcloud.org/documents/20412915-cn-640000-cohd2>; Florida Pregnancy Support Services Program, *Contract #COH5P*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 16, 2009), available at <https://beta.documentcloud.org/documents/20412911-cn-640000-coh5p>.

<sup>58</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>.

<sup>59</sup> Contract Renewal #1, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 4, 2018), available at <https://beta.documentcloud.org/documents/20412975-cn-640000-cohn6-r1>; Contract Renewal #2, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 29, 2019), available at <https://beta.documentcloud.org/documents/20412976-cn-640000-cohn6-renewal2-2019>; Amendment: Contract Summary, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Aug. 7, 2020), available at <https://beta.documentcloud.org/documents/20412974-cn-640000-cohn6-r3a1>.

Similarly, a contract signed in 2013 (2013-14 contract), had two amendments extending the expiration date.<sup>60</sup> A 2015 amendment to the 2013-14 contract set subcontractor reimbursement rates to the current rate of \$50 an hour for face-to-face direct client services, in addition to \$1/minute of counseling. By signing the mentioned amendments in replace of entering new contracts, DOH is able to manipulate reimbursement rates granted to Florida Pregnancy Care Network without requiring added oversight or reporting.

Reimbursement rates for counseling services provided by the program's anti-abortion pregnancy centers are disproportionately higher than state Medicaid reimbursements for many actual health care services. Medicaid reimbursed providers are subject to more oversight, requirements, and licensures than detailed required by subcontractors in the FPCN syndicate. For example in 2017, the state authorized a reimbursement rate of \$31.04 per visit for a home health visiting Registered Nurse.<sup>61</sup> A Registered Nurse is required to apply for a license prior to practicing. In order to apply, an applicant must meet specific qualifications, including graduation from a Florida approved or accredited nursing education program.<sup>62</sup> Applying for licensure requires an application fee of \$110.<sup>63</sup> Despite the high costs, training, and qualifications needed to be a Registered Nurse in the state of Florida, the state approved Medicaid reimbursement rates are half of what the state reimburses staff at anti-abortion pregnancy centers in the Florida Pregnancy Support Services Program. In contrast, the contract between Florida Pregnancy Care Network and DOH state only vagaries in terms of required staff requirements:

"Professional qualifications: Ensure staff members affiliated with this program have the education, experience and training necessary to successfully carry out their duties. This includes any professional licensure or certification which may be required by law."

The state reimburses staff at anti-abortion pregnancy centers in the Florida Pregnancy Services Program double the state approved Medicaid reimbursement rates for Registered Nurses in Florida, despite the high costs, training and qualifications needed to be an RN in Florida.

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<sup>60</sup> Florida Pregnancy Support Services Program, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 3, 2013), available at <https://beta.documentcloud.org/documents/20412915-cn-640000-cohd2>; Contract Renewal #1, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 24, 2014), available at <https://beta.documentcloud.org/documents/20413041-cn-640000-cohd2-r1>; Contract Renewal #2, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Apr. 30, 2015), available at <https://beta.documentcloud.org/documents/20413040-cn-640000-cohd2-r2>; Contract Renewal #3, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (May 4, 2016), available at <https://beta.documentcloud.org/documents/20413039-cn-640000-cohd2-r3>.

<sup>61</sup> *Home Health Visit Services Fee Schedule*, THE AGENCY FOR HEALTH CARE ADMINISTRATION (Jan. 1, 2018), available at [https://ahca.myflorida.com/medicaid/review/Reimbursement/Home\\_Health\\_Visit\\_Services\\_Fee\\_Schedule.pdf](https://ahca.myflorida.com/medicaid/review/Reimbursement/Home_Health_Visit_Services_Fee_Schedule.pdf).

<sup>62</sup> Requirements, *Licensed Practical Nurse & Registered Nurse by Examination*, FLORIDA BOARD OF NURSING (last accessed Nov. 17, 2020), available at <https://floridasnursing.gov/licensing/licensed-practical-nurse-registered-nurse-by-examination/-tab-requirements>.

<sup>63</sup> Fees, *Licensed Practical Nurse & Registered Nurse by Examination*, FLORIDA BOARD OF NURSING (last accessed Nov. 17, 2020), available at <https://floridasnursing.gov/licensing/licensed-practical-nurse-registered-nurse-by-examination/#tab-fees>.

### *Subcontractor Self-Monitoring*

A continued problem with Florida Pregnancy Support Services Program is the lack of adequate monitoring of subcontractors. The program largely allows self-monitoring, including a subcontractor's own medical provider approving the medical information presented to patients. All concerns, from lack of critical wellness services provided to religious coercion, are therefore left to be assessed by the subcontractors themselves. Moreover, Florida does not require the subcontractors in this program to serve a minimum number of patients or to provide a minimum level of services.<sup>64</sup>

### *Lack of Critical Wellness Services*

The network's 2017-18 contract requires it to create a wellness program offering "high blood pressure screenings, flu/tetanus vaccines, smoking cessations services, pap smear, and sexually transmitted infection testing."<sup>65</sup> These services, which are provided by wellness program subcontractors, are mandatory, but the FPCN is only required to subcontract with two wellness centers; one wellness center directly providing services, and an additional wellness center able to provide vouchers for services at another facility.<sup>66</sup>

As of May 2018, 13 of 100 anti-abortion crisis pregnancy sites provided STI testing. Most wellness services appear to be offered to clients through referrals. A website promoting the program allows visitors to search for providers in their area. By using the "wellness" facility search on the website, zero subcontractors appear to offer wellness services, but instead offer "wellness referrals." These numbers raise the concerning question of what the 68+ other sites were doing instead of providing essential health services.<sup>67</sup>

### *False and Deceptive Medical Information*

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<sup>64</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>; Florida Pregnancy Support Services Program, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 3, 2013), available at <https://beta.documentcloud.org/documents/20412915-cn-640000-cohd2>; Florida Pregnancy Support Services Program, *Contract #COH5P*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 16, 2009), available at <https://beta.documentcloud.org/documents/20412911-cn-640000-coh5p>.

<sup>65</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>.

<sup>66</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>.

<sup>67</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>.

An analysis of public information and volunteer materials provided by network subcontractors showed that they are attempting to sway clients with deceptive information. Information on the unsafe and unproven abortion pill reversal technique is often mentioned, in addition to false claims that abortion and birth control can cause depression, future infertility, breast cancer, and suicidal thoughts. For example, Verity Pregnancy and Medical Resource Center (Lee County) and A Woman's Answer Medical Center (Alachua County), both include deceptive medical information on their websites. Verity claims the risk of breast cancer after an abortion increases by fifty percent, whereas the American Cancer Society states, that abortion does not raise the risk "of breast cancer or any other type of cancer."<sup>68</sup> A Woman's Answers Medical Center in Gainesville, Florida, claims on their website that birth control leads to a risk of "[c]ervical and breast cancer."<sup>69</sup> However, studies show women are not at higher risk for either cancer after taking birth control.<sup>70</sup>

Bay Area Pregnancy Center

I am interested in helping in the following areas:

**Administrative:**

- ☐ Receptionist
- ☐ Office work
- ☐ Prayer
- ☐ Counseling
- ☐ Presenting Gospel to clients

**Marketing:**

- ☐ Con...
- ☐ Fu...
- ☐ W...
- ☐ Pu...
- ☐ Mailin...

Please indicate times for you to volunteer: \_\_\_\_\_

Which center do you prefer? ☐ Clearwater ☐ St. Pete ☐ High

If you checked "Prayer" or "Presenting Gospel" please answer:

Please finish this sentence: Generally speaking, I... (Please check one)

<input type="checkbox"/> anger quickly	<input type="checkbox"/> take ever
<input type="checkbox"/> can handle conflict	<input type="checkbox"/> get frustr
<input type="checkbox"/> hate to confront	<input type="checkbox"/> in sin
<input type="checkbox"/> am a nice person	<input type="checkbox"/> listen but don't

Figure 1 Screenshot of Volunteer Application required of the Bay Area Pregnancy Center.

Grace House is an anti-abortion pregnancy center that contracts with FPCN and has three locations in Volusia County. The Grace House website dedicates an entire webpage to those "[c]onsidering [a]bortion." The webpage lists "snippets" of abortion-related information and requests the webpage viewer to "visit the [Grace House] center for more information." These snippets appear to be deliberately misleading and intended to encourage a pregnant person viewing the page to schedule an appointment with Grace House. For instance, a section details a "partial birth abortion" as "a procedure in which the life of the fetus is terminated after having been extracted..." trailing off without finishing the sentence<sup>71</sup> "Partial-birth" is not a medical procedure at all, but a political term coined by the anti-abortion movement in 1995 to describe a standard dilation and evacuation abortion.<sup>72</sup>

The Next STEPP Center in St. Petersburg incorrectly claims "you can only become pregnant on certain days of the month," as a way to convince site visitors they should not obtain

<sup>68</sup> American Cancer Society, *Conclusion: Abortion and Breast Cancer Risk*, CANCER.ORG (last accessed Nov. 19, 2020), available at <https://www.cancer.org/cancer/cancer-causes/medical-treatments/abortion-and-breast-cancer-risk.html>.

<sup>69</sup> A Woman's Answer Medical Center, *Birth Control*, AWOMANSANSWER.NET (last accessed Nov. 19, 2020), available at <https://www.awomansanswer.net/womens-health/birth-control/>.

<sup>70</sup> Harvard Women's Health Watch, *Study Finds Weak Link Between Birth Control and Breast Cancer*, HARVARD HEALTH PUBLISHING: HARVARD MEDICAL SCHOOL (Oct. 13, 2020), available at <https://www.health.harvard.edu/womens-health/study-finds-weak-link-between-birth-control-and-breast-cancer>.

<sup>71</sup> Grace House Pregnancy Center, *Considering Abortion?* GRACEHOUSEPRC.ORG (last accessed Nov. 18, 2020), available at <https://gracehouseprc.org/abortion-alternatives/>.

<sup>72</sup> Julie Rovner, 'Partial-Birth Abortion': Separating Fact From Spin, NPR (Feb. 21, 2006, available at <https://www.npr.org/2006/02/21/5168163/partial-birth-abortion-separating-fact-from-spin>.

the emergency contraceptive (EC).<sup>73</sup> Additionally contrary to the opinion of The American College of Obstetricians and Gynecologists,<sup>74</sup> Next STEPP promotes the common claim anti-abortion leaders promote that EC is an abortifacient, a drug inducing an abortion. Next STEPP states taking EC “after fertilization has taken place may prevent the newly formed life from settling into the uterus and continuing to grow, which some consider a form of early abortion.”<sup>75</sup> This is false. Studies show EC prevents ovulation. Multiple brands of EC are on the market, including Plan B®. By preventing ovulation, the medication prevents “an egg’s release until sperm can no longer fertilize it.”<sup>76</sup>

### *Widespread Use of Abortion Reversal Rhetoric*

Medication abortion was approved up to ten weeks of pregnancy by the United States Food and Drug Administration (FDA) in 2000. The FDA-approved treatment includes two drugs taken orally – the standard protocol consists of mifepristone and misoprostol. Mifepristone is taken orally followed by misoprostol taken 24 to 48 hours later; when these two drugs are taken together, a medication abortion terminates the pregnancy in 96% of cases.

Research does not support claims that a medical abortion can be reversed. Dr. George Delgado advanced an experimental treatment claiming to “reverse” abortion by foregoing the second medication abortion drug, misoprostol, and instead administering a regimen of the hormone progesterone.<sup>77</sup> There is no specific protocol for the progesterone treatment, beyond a large amount of progesterone administered by injection, orally or vaginally, for an unspecified length of time, and sometimes throughout the remainder of the pregnancy.<sup>78</sup> Mifepristone is used to block progesterone formation causing the pregnancy to detach from the uterine wall, so the unproven hypothesis of this experimental treatment is that progesterone can counteract the effects of mifepristone.<sup>79</sup> The FDA has not approved this untested and unproven so-called abortion pill reversal treatment.<sup>80</sup>

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<sup>73</sup> The Next STEPP Center, *What is the Morning After Pill?*, NEXTSTEPP.ORG (last accessed Nov. 18, 2020), available at <https://nextstepp.org/what-is-the-morning-after-pill/>.

<sup>74</sup> *Emergency Contraception*, THE AMERICAN COLLEGE OF OBSTETRICIANS AND GYNECOLOGISTS (last accessed Jan. 13, 2021), available at <https://www.acog.org/clinical/clinical-guidance/practice-bulletin/articles/2015/09/emergency-contraception>.

<sup>75</sup> *Id.*

<sup>76</sup> Julie Rovner, *Morning-After Pills Don’t Cause Abortion, Studies Say*, NPR (Feb. 21, 2013), available at <https://www.npr.org/sections/health-shots/2013/02/22/172595689/morning-after-pills-dont-cause-abortion-studies-say>; Pam Belluck, *Abortion Qualms on Morning-After Pill May Be Unfounded*, The New York Times (Jun. 5, 2012), available at <https://www.nytimes.com/2012/06/06/health/research/morning-after-pills-dont-block-implantation-science-suggests.html?pagewanted=all>.

<sup>77</sup> See George Delgado et al., *A Case Series Detailing the Successful Reversal of the Effects of Mifepristone Using Progesterone*, 33 *Issues in Law & Medicine* (2018).

<sup>78</sup> *Id.*

<sup>79</sup> *Id.*

<sup>80</sup> Mitchell D. Creinin et al., *Mifepristone Antagonization With Progesterone to Prevent Medical Abortion*, 135 *Obstetrics & Gynecology* 158-165 (2020), available at [https://journals.lww.com/greenjournal/Citation/2020/01000/Mifepristone\\_Antagonization\\_With\\_Progesterone\\_to.21.aspx](https://journals.lww.com/greenjournal/Citation/2020/01000/Mifepristone_Antagonization_With_Progesterone_to.21.aspx).

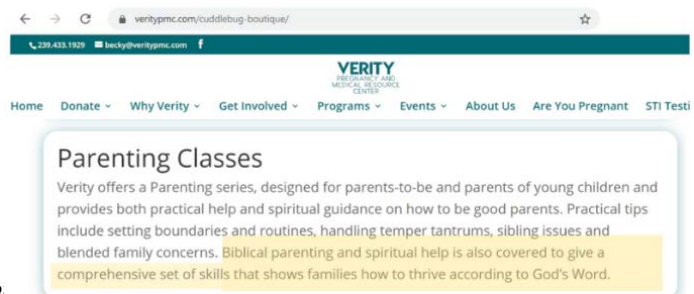
Dr. Delgado's hypothesis is based on flawed experiments, including his 2012 and 2018 case studies.<sup>81</sup> In 2019, researchers from the University of California, Davis had to halt a study into the efficacy of progesterone in preventing an abortion once mifepristone has been taken due to safety concerns after three patients experienced vaginal bleeding. The researchers concluded:

We could not estimate the efficacy of progesterone for mifepristone antagonization due to safety concerns when mifepristone is administered without subsequent prostaglandin analogue treatment. Patients in early pregnancy who use only mifepristone may be at high risk of significant hemorrhage.<sup>82</sup>

Numerous anti-abortion pregnancy centers promote abortion pill reversal, despite the risk of harm to patients. A Woman's Choice in Lakeland, Florida, claims that a medical abortion can be reversed but it is a "time-sensitive medical protocol."<sup>83</sup> Pregnancy Help & Information Center (PHI Center) of Tallahassee highlights abortion pill reversal on the Frequently Asked Questions section of its webpage. PHI Center claims abortion pill reversal has a "64-68% success rate" and directs website visitors to [abortionpillreversal.com](http://abortionpillreversal.com) – a website managed by Abortion Pill Rescue<sup>84</sup> – for more information.<sup>85</sup> Guiding Star Tampa in Lutz pressures a website visitor to call the hotline run by the organization and claims their "medical professionals" will guide callers towards reversing the effects of the abortion pill."<sup>86</sup> In addition to the numerous anti-abortion pregnancy centers promoting the abortion pill reversal hypothesis, Florida Pregnancy Care Network, through its own website, promotes Abortion Pill Rescue via a hyperlink attached to the words "Emergency Pregnancy Services."<sup>87</sup>

## Religious Coercion

Florida Pregnancy Care Network's contract with DOH prohibits religious coercion: "Ensure that all services provided with funds



Verity's website is clear that religious teaching is part of their curriculum in Fort Myers.

<sup>81</sup> See Daniel Grossman & Kari White, *Abortion*, *Journal of Medicine* 1401-03 (2018).

<sup>82</sup> Mitchell D. Creinin et al., *Mifepristone An* *Obstetrics & Gynecology* 158-165 (2020). <https://journals.lww.com/greenjournal/Citation.aspx>.

<sup>83</sup> A Woman's Choice, *Abortion Pill*, YOURCHOICELAKELAND.COM (last accessed Nov. 18, 2020), available at <https://yourchoicelakeland.com/lakeland-abortion-information/abortion-pill/>.

<sup>84</sup> Abortion Pill Rescue, *Home*, ABORTIONPILLREVERSAL.COM (last accessed Nov. 18, 2020), available at <https://www.abortionpillreversal.com/about/our-team>. CfA called on the FDA to seize the website domain belonging to Abortion Pill Rescue, among others, due to the websites peddling a potentially dangerous abortion pill reversal. Letter to Dr. Janet Woodcock and Donald Ashley, *Referral of Unlawful Prescription of Dangerous Abortion Pill Reversal*, CAMPAIGN FOR ACCOUNTABILITY (May 20, 2020), available at [https://campaignforaccountability.org/wp-content/uploads/2020/05/FDA-Letter-Abortion-Reversal\\_5\\_20\\_2020.pdf](https://campaignforaccountability.org/wp-content/uploads/2020/05/FDA-Letter-Abortion-Reversal_5_20_2020.pdf).

<sup>85</sup> What is the Abortion Pill Reversal, *Frequently Asked Questions*, PREGNANCY HELP & INFORMATION CENTER (last accessed Nov. 18, 2020), available at <https://www.phicenter.org/faqs>.

<sup>86</sup> Guiding Star, *Abortion Pill Reversal*, GUIDINGSTARTAMPA.COM (last accessed Nov 18, 2020), available at <https://guidingstartampa.com/abortion-pill-reversal/>.

<sup>87</sup> Florida Pregnancy Care Network, Inc., *Resources*, MYFPCN.COM (last accessed Nov.18, 2020), available at <https://myfpcn.com/>.

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Figure 2 Screenshot of Verity Pregnancy and Medical Resource Center including religious teachings within its parenting classes.

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from this contract are provided in a manner that is non-coercive and does not include religious content.”<sup>88</sup> However, the network spent “several years” of state funding on educational materials which “create openings for counselors to share Christ” — which can be billed as “counseling” to the state.<sup>89</sup> The counseling budget included materials from Earn While You Learn — a company that sells religious pregnancy and parental learning materials. Earn While You Learn is a religious curriculum allowing anti-abortion pregnancy center counselors “to share Christ.” Earn While You Learn provides classes and material support to women to “become a successful mother.”<sup>90</sup>

Figure 3 Screenshot of A Women’s Pregnancy Center volunteer application.

Anti-abortion pregnancy centers subcontracted by FPCN require volunteers to complete applications. These applications ask in-depth questions of a potential volunteer, such as the applicant’s view of abortion, if they know someone who has had an abortion, and what church they belong to. Many applications even require applicants to provide referrals from the church’s pastor.

Grace House, with three centers in Volusia

County, describes its organizational structure as a “501(c)3 Christian mission,” referring to Grace House’s nonprofit tax filing status.<sup>91</sup> A volunteer

brochure from Grace House shows applicants are able to choose how they assist the organization.<sup>92</sup> Volunteer applicants have a choice of client advocates, volunteers for the ultrasound program, or counselors.<sup>93</sup> According to a brochure from Grace House, client advocates share the gospel and pray with clients, while volunteers for the ultrasound program are required to have various medical degrees.<sup>94</sup> This seems to indicate volunteers provide ultrasounds and testing. Finally, volunteers can be counselors, leading “abortion recovery” counseling, and facilitating an 11-week Bible study once or more a year.<sup>95</sup>

Grace House does not recommend, provide or refer single women for contraceptives. Married women seeking this information are urged to seek counsel, along with their husbands,

<sup>88</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC., 10 (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>.

<sup>89</sup> Florida Pregnancy Care Network, *1<sup>st</sup> Quarter 2018 FPCN Invoices*, 1165 (2018), available at <https://beta.documentcloud.org/documents/20412869-1st-quarter-2018-fpcn-invoices>.

<sup>90</sup> Earn While You Learn, *Overview of EWYL*, EQYLO.NLINE.COM (last accessed Nov. 19, 2020), available at [http://www.ewylonline.com/what\\_overview\\_of\\_ewyl.aspx](http://www.ewylonline.com/what_overview_of_ewyl.aspx).

<sup>91</sup> Volunteering at Grace House Pregnancy Center, *Volunteer Brochure*, GRACE HOUSE PREGNANCY RESOURCES CENTER, INC. (Jan. 2018), available at <https://beta.documentcloud.org/documents/20412871-2018-volunteer-brochure-gh-e>.

<sup>92</sup> *Id.*

<sup>93</sup> *Id.*

<sup>94</sup> *Id.*

<sup>95</sup> *Id.*

from their pastor and physicians. Additionally, Grace House requires “a commitment to the sanctity of human life, even in the hard case of rape, incest and suspected fetal deformity.”<sup>96</sup>

Grace House is not the only FPCN subcontractor to include this information in application materials for a volunteer; A Women’s Pregnancy Center (Leon County)<sup>97</sup> and Bay Area Pregnancy Center (four centers in Pinellas County),<sup>98</sup> for example, also require volunteers to be of the Christian faith.

### *Wasteful Program Budget*

Each anti-abortion pregnancy center’s contract with Florida Pregnancy Care Network is administered by DOH. Over the years, DOH has approved seemingly wasteful budget line items. An example is the DOH and Florida Pregnancy Care Network 2013-14 contract.<sup>99</sup> Through numerous amendments, the contract term extended to June 30, 2017. In a September 2015 amendment, DOH approved \$508,000 for educational materials.<sup>100</sup> This was increased by \$50,000 to \$558,000 in April 2016.<sup>101</sup> However, three months later in July 2016, the requirement that the network provide sample curricula for subcontractors was deleted from the contract, leaving local centers to provide education services without DOH knowing the content of those services.<sup>102</sup>

Christian Faith and Practice:


What church do you attend? \_\_\_\_\_ How often? \_\_\_\_\_

Pastor’s Name \_\_\_\_\_ Church Phone # \_\_\_\_\_

Briefly describe how you came to know Christ as your personal Savior.

\_\_\_\_\_

Tampa/Land O Lakes/  
Wesley Chapel



Are you now living a lifestyle of sexual integrity as defined in the Bible? (abstinent if single/faithful to your spouse if married)? Yes No

Figure 4 Screenshot of Oasis Pregnancy Care Center Volunteer Application

### **Education Materials**

DOH replaced the curricula requirement in July 2016 with a requirement that ten subcontractors provide employability training to clients through the “Win at Work” software

<sup>96</sup> Five Essential Commitments, *Volunteer Application Packet*, GRACE HOUSE PREGNANCY RESOURCES CENTER, INC. (distributed 2019), available at <https://beta.documentcloud.org/documents/20455508-volunteer-application-packetdocx>.

<sup>97</sup> See Figure 3.

<sup>98</sup> See Figure 1 & 4.

<sup>99</sup> Florida Pregnancy Support Services Program, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 3, 2013), available at <https://beta.documentcloud.org/documents/20412915-cn-640000-cohd2>.

<sup>100</sup> Florida Pregnancy Support Services Program, *Amendment #R2A2 Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC., 30 (Sep. 30, 2015), available at <https://beta.documentcloud.org/documents/20412896-cn-640000-cohd2-r2a2>.

<sup>101</sup> Florida Pregnancy Support Services Program, *Amendment #R2A3 Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC., 2 (Apr. 8, 2016), available at <https://beta.documentcloud.org/documents/20412897-cn-640000-cohd2-r2a3-2>.

<sup>102</sup> *Id.*

program.<sup>103</sup> Local centers funded by the program had thirty days to purchase the program from the contract's execution date. The program was given \$27,500 for the employability training.<sup>104</sup> After these required expenditures, the requirement was cut a year later and is not included in the 2017 contract.<sup>105</sup>

### **OptionLine**

As mentioned above, OptionLine, a toll-free hotline – 1-866-673-HOPE – and texting bank is defined in the contract as a call center “for women to obtain the location and contact information for a pregnancy center in their area.” The network and DOH currently budget OptionLine at \$40,000, but the budgeted amount went to its highest level of \$50,000 in 2016.<sup>106</sup> The \$40,000 budget amount does not include a salary line item or details into the OptionLine, making it unclear who operates the hotline.<sup>107</sup> Instead, the budget allocates \$4.25 per call made to the hotline, and the texting bank costs the network \$25 per month.<sup>108</sup>

OptionLine appears to be another tool to coerce pregnant people away from accessing abortion services. A call was placed to OptionLine on November 15, 2020. The caller told the hotline operator that they thought they were pregnant and wanted to learn their options. The operator took the caller's zip code and directed the caller to North Miami Pregnancy Help Center (Dade County). Overall, the call lasted two minutes. Based on the contractual budget, this two-minute call cost the state of Florida \$4.25 or about \$2.13 per minute. An additional web search shows the North Miami Pregnancy Help Center is actually Pregnancy Help Medical Clinics, with four locations in South Florida, offering free pregnancy testing, ultrasounds, community resources, STD/STI information, and “information on your options.”<sup>109</sup> Pregnancy Help Medical Clinics does not provide medical services. Instead, their website provides deceptive and misinformation about abortion services designed to scare pregnant people away from obtaining care.<sup>110</sup> The OptionLine is used as another way to coerce pregnant people by directing them to anti-abortion pregnancy centers.

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<sup>103</sup> Florida Pregnancy Support Services Program, *Amendment #R3A1 Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC., 30 (Jun. 28, 2016), available at <https://beta.documentcloud.org/documents/20412898-cn-640000-cohd2-r3a1-4>.

<sup>104</sup> *Id.* at 14.

<sup>105</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>.

<sup>106</sup> Amendment: Contract Summary, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Aug. 7, 2020), available at <https://beta.documentcloud.org/documents/20412974-cn-640000-cohn6-r3a1>; Florida Pregnancy Support Services Program, *Amendment #R3A1 Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC., 30 (Jun. 28, 2016), available at <https://beta.documentcloud.org/documents/20412898-cn-640000-cohd2-r3a1-4>.

<sup>107</sup> Amendment: Contract Summary, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Aug. 7, 2020), available at <https://beta.documentcloud.org/documents/20412974-cn-640000-cohn6-r3a1>.

<sup>108</sup> *Id.*

<sup>109</sup> Home, PREGNANCY HELP MEDICAL CLINICS (last accessed Nov. 19, 2020), available at <https://www.pregnancyhelpclinics.org/en>.

<sup>110</sup> Abortion Education, PREGNANCY HELP MEDICAL CLINICS (last accessed Nov. 19, 2020), available at <https://www.pregnancyhelpclinics.org/en/the-issues/abortion-education>.

## **Contract Management**

Florida Pregnancy Care Network is in charge of contract management to ensure the anti-abortion pregnancy centers are compliant with program requirements. Since the 2013-14 contract, management fees budgeted for the network have steadily increased while its oversight requirements have decreased.<sup>111</sup> DOH reimburses the network \$500 per subcontractor per month for project management. The contract requires a minimum of 45 subcontractors, meaning the contract management minimum is \$270,000 per year.<sup>112</sup> There is no explanation within the signed contracts between DOH and the Florida Pregnancy Care Network for how the \$500 is used and no clear reporting requirement connected with receipt of the \$500 per subcontractor per month. In a contract signed in 2009 (2009-10 contract), DOH reimbursed at \$416.50 per subcontractor per month, decreasing to \$380 per subcontractor per month in the 2013-14 contract, before increasing to the current \$500 per subcontractor per month.<sup>113</sup>

## **Lax Monitoring and Oversight**

Monitoring and oversight requirements of Florida Pregnancy Support Services Program by DOH have lessened or dropped altogether as Florida Pregnancy Care Network's contractual amount increased thus providing less accountability for how taxpayer dollars are being used. In a 2011 amendment to the 2009-10 contract, DOH added a requirement that the network submit a monthly narrative of its executive director's activity.<sup>114</sup> This was dropped in a 2015 amendment to the 2013-14 contract and never reinstated.<sup>115</sup> In the 2009-2010 contract, DOH required immediate notification of subcontractor termination.<sup>116</sup> This requirement was later extended to notify the agency within 30 days. In a 2011 amendment, onsite monitoring of all subcontractors was required annually, but in 2013 this was changed to "a monitoring" with no time frame

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<sup>111</sup> Florida Pregnancy Support Services Program, *Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 3, 2013), available at <https://beta.documentcloud.org/documents/20412915-cn-640000-cohd2>; Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>.

<sup>112</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>.

<sup>113</sup> Florida Pregnancy Support Services Program, *Contract #COH5P*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 16, 2009), available at <https://beta.documentcloud.org/documents/20412911-cn-640000-coh5p>.

<sup>114</sup> Florida Pregnancy Support Services Program, *Amendment #0001 to Renewal 2 Contract #COH5P*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2011), available at <https://beta.documentcloud.org/documents/20412916-cn-640000-coh5p-r2a1>.

<sup>115</sup> Florida Pregnancy Support Services Program, *Amendment #R2A2 Contract COHD2*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC., 30 (Sep. 30, 2015), available at <https://beta.documentcloud.org/documents/20412896-cn-640000-cohd2-r2a2>.

<sup>116</sup> Florida Pregnancy Support Services Program, *Contract #COH5P*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jul. 16, 2009), available at <https://beta.documentcloud.org/documents/20412911-cn-640000-coh5p>.

required.<sup>117</sup> In the 2017-18 contract, DOH required either an onsite visit, or a “desk review.”<sup>118</sup> An explanation for what is required of a desk review was not given.<sup>119</sup> In a June 2018 amendment, the requirement to monitor subcontractors every other year was removed, leaving only the mandate to monitor subcontractors through an undefined desk review, without a timeframe in which to do so.<sup>120</sup>

## Florida Pregnancy Care Network

### *History*

Florida Pregnancy Care Network is a 501(c)(3) organization, first incorporated in Florida on August 26, 2005, by Rufus S. Armstrong and Kiera Camron.<sup>121</sup> Armstrong is a Tampa-based obstetrician and gynecologist who was sued twice in 1995 for medical malpractice. An attorney representing the victims at the time proposed his own legislation, explaining to state legislators the need for potential patients to more easily obtain information on a doctor’s history. That same year, a bill was defeated that would have established a reporting system to inform patients.<sup>122</sup> Armstrong went on to create an organization responsible for administering millions of dollars in counseling to pregnant people. Armstrong left the network in 2007. Kiera Camron is a veteran in the anti-abortion movement and was executive director of Open Door Women’s Clinic, an anti-abortion pregnancy center in Tallahassee, Florida.<sup>123</sup> Kiera left the network in 2008 and is currently the president of the Good Shepherd Catholic Church, also in Tallahassee.<sup>124</sup> Florida Pregnancy Care Network currently has five board members and an executive director.<sup>125</sup> All parties currently involved with the network are entrenched in Florida’s anti-abortion and conservative political circles.

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<sup>117</sup> Florida Pregnancy Support Services Program, *Amendment #0001 to Renewal 2 Contract #COH5P*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2011), available at <https://beta.documentcloud.org/documents/20412916-cn-640000-coh5p-r2a1>.

<sup>118</sup> Florida Pregnancy Support Services Program, *Contract COHN6*, STATE OF FLORIDA DEPARTMENT OF HEALTH AND FLORIDA PREGNANCY CARE NETWORK, INC. (Jun. 30, 2017), available at <https://beta.documentcloud.org/documents/7208161-CN-640000-COHN6>.

<sup>119</sup> *Id.*

<sup>120</sup> Florida Pregnancy Care Network and State of Florida Department of Health, *Contract COHN6: Renewal #1*, STATE OF FLORIDA DEPARTMENT OF HEALTH (Jun. 4, 2018), available at <https://beta.documentcloud.org/documents/20412975-cn-640000-cohn6-r1>.

<sup>121</sup> Florida Pregnancy Care Network, Inc., *Articles of Incorporation*, FLORIDA SECRETARY OF STATE (Aug. 24, 2005), available at <https://beta.documentcloud.org/documents/20412920-articles-of-incorporation-2005>.

<sup>122</sup> Cindy Rupert, *Patients Blame Doctor for Woes; Complaints Prompt Lawyer to Push for Reform*, THE TAMPA TRIBUNE (Jul. 13, 1995).

<sup>123</sup> Kiera Camron, *Women Should Beware of Morning-After Pill’s Risk*, THE TALLAHASSEE DEMOCRAT (Sep. 9, 2005); Open Door Women’s Clinic, *About Us*, DONATEODWC.COM (last accessed Nov. 19, 2020), available at <https://www.donateodwc.com/>.

<sup>124</sup> Sacred Heart Home Educators, *Ministry Contact*, GOOD SHEPHERD CATHOLIC CHURCH (last accessed Nov. 19, 2020), available at <https://goodshepherdparish.org/sacred-heart-home-educators>.

<sup>125</sup> Florida Pregnancy Care Network, Inc., *FY 17/18 Return of Organization Exempt from Income Tax Form 990*, 7 (Jan. 15, 2020), available at <https://projects.propublica.org/nonprofits/organizations/203707766/202040359349300924/full>.

Florida Pregnancy Care Network's mission "is to enhance the efforts of Florida pregnancy resource organizations that deliver wellness services to qualifying women, and that provide emotional and material support to pregnant women in need, enabling them to carry their pregnancies to term and choose parenting or adoption." Since 2009, Florida granted the network over \$30 million in tax dollars for distribution to subcontractors. Despite this wealth of state funding moving through the network, it is required to do little monitoring of subcontractors' performance.

Contracts require all subcontractors in the program must provide accurate medical materials and information to all clients and references for any medical statements made, but the network's website has a link for "Emergency Pregnancy Services"<sup>126</sup> that directs visitors to the website [abortionpillreversal.com](http://abortionpillreversal.com), for the organization Abortion Pill Rescue.<sup>127</sup> As described previously, abortion reversal is not effective and has been rejected by the greater medical community.

### *Board of Directors*

Rather than having any expertise in reproductive health, Florida Pregnancy Care Network's board members are conservative political operatives, some of whom have been tied to scandals across the Southern United States.

### **Jim Kallinger (Chairman)**

James "Jim" Rudolph Kallinger was a Republican state representative for Florida House District 35 from 2001 to 2004. Kallinger is a longtime Florida political insider and in 2020 was a candidate for the Florida House District 9.

Kallinger's 2020 campaign was audited twice for campaign finance violations, once for receiving a campaign contribution from a supporter over the \$1,000 contribution limit,<sup>128</sup> and the second for gifting his own campaign over the \$1,000 limit.<sup>129</sup> Kallinger's board seat at Florida Pregnancy Care Network is not listed on his campaign website, despite the site promoting him serving on two additional boards at the Interfaith Hospitality Network and the Florida Housing

 **Jim Kallinger for Florida House**  
September 12 at 5:57 PM · 🌐

It was a beautiful weekend and our team had a great time walking neighborhoods. We met some wonderful people. We need to ensure that our communities, and our right to the pursuit of happiness, are properly protected. I am the candidate who will stand for law and order. Make sure to vote for Jim! #kallinger4house



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1 Comment

<sup>126</sup> Florida Pregnancy Care Network, Inc., *Resources*, MYFPCN.COM (last accessed Nov. 10, 2020), available at <https://myfpcn.com/>.

<sup>127</sup> Abortion Pill Rescue, *Home*, ABORTIONPILLREVERSAL.COM (last accessed Nov. 18, 2020), available at <https://www.abortionpillreversal.com/about/our-team>.

<sup>128</sup> Letter for Steve Liedy, Treasurer for Candidate Jim Kallinger from Kristi Reid Willis, *Re: CAN 77302* (Jul. 20, 2020), available at <https://beta.documentcloud.org/documents/20412979-campaigndocument-2>.

<sup>129</sup> Letter for Steve Liedy, Treasurer for Candidate Jim Kallinger from Kristi Reid Willis, *Re: CAN 77302* (Sep. 14, 2020), available at <https://beta.documentcloud.org/documents/20412980-campaigndocument>.

Development Corporation.<sup>130</sup> Pictures on the “Jim Kallinger for Florida House” Facebook page show Kallinger campaigning during the COVID-19 epidemic without a mask, along with supporters without social distancing precautions.<sup>131</sup>

Kallinger is a Senior Strategist at Front Line Strategies, a public relations firm, specializing in grassroots and political campaigns.<sup>132</sup> Front Line Strategies is run by President Brett Doster and Vice President Matt Doster, who are brothers.<sup>133</sup> Brett Doster is a longtime insider of the Florida Republican party; their father, Russell Doster, a wealthy real estate broker of Doster Broker Group, is also heavily involved in conservative Florida PACs and nonprofits. Front Line Strategies and Brett Doster produced the first television ad for Roy Moore’s 2018 U.S. Senate campaign.<sup>134</sup> The day Front Line Strategies and Brett Doster released the produced ad for Moore, *The Washington Post* broke allegations that Moore sexually assaulted a 14-year-old and pursued romantic relationships with at least three other teenage girls when Moore was in his 30s.<sup>135</sup> The deeply troubling allegations did not sway Brett Doster from staunchly defending his client.<sup>136</sup> Brett Doster tweeted, “Interesting how the GOP establishment is lining up with Libs to attack @MooreSenate before weighing evidence. Almost like they were colluding – as usual. They’ll be proven wrong, and @MooreSenate will win in 4 weeks. #ALSEN.”<sup>137</sup> Kallinger is listed on the Front Line Strategies website as specializing in “political and issues campaigns.”<sup>138</sup>



<sup>130</sup> *Meet Jim Kallinger!*, JIM KALLINGER, REPUBLICAN FOR FLORIDA HOUSE, DISTRICT 9 (last accessed Nov. 19, 2020), available at <http://kallingerforhouse.com/>.

<sup>131</sup> *Id.*

<sup>132</sup> *Our Team*, FRONT LINE STRATEGIES (last accessed Nov. 19, 2020), available at <http://www.flspr.com/index.html>.

<sup>133</sup> *Jim Kallinger: Senior Strategist*, FRONT LINE STRATEGIES (last accessed Nov. 19, 2020), available at <http://www.flspr.com/index.html#team>.

<sup>134</sup> Jeff Burlew, *Tallahassee Consultant Advising Roy Moore as Bombshell Allegations Drop*, TALLAHASSEE DEMOCRAT (Nov. 10, 2017), available at <https://www.tallahassee.com/story/news/2017/11/10/doster-advising-moore-bombshell-allegations-drop/852731001/>.

<sup>135</sup> Brian Lyman, *Woman tells Newspaper Roy Moore Groped Her When She was 14; Other Women Make Similar Claims*, TALLAHASSEE DEMOCRAT (Nov. 9, 2017), available at <https://www.tallahassee.com/story/news/politics/2017/11/09/woman-tells-newspaper-roy-moore-groped-her-when-she-14-other-women-make-similar-claims/848832001/>.

<sup>136</sup> Jeff Burlew, *Tallahassee Consultant Advising Roy Moore as Bombshell Allegations Drop*, TALLAHASSEE DEMOCRAT (Nov. 10, 2017), available at <https://www.tallahassee.com/story/news/2017/11/10/doster-advising-moore-bombshell-allegations-drop/852731001/>.

<sup>137</sup> Brett Doster, @BrettDoster, TWITTER (Nov. 10, 2017), available at <https://twitter.com/BrettDoster/status/929057533360263170>.

<sup>138</sup> *Jim Kallinger: Senior Strategist*, FRONT LINE STRATEGIES (last accessed Nov. 19, 2020), available at <http://www.flspr.com/index.html#team>.

### **Amber Kelly Butler (Board Member)**

Amber Kelly Butler is a conservative lobbyist and political communications operative. Prior to joining the board of Florida Pregnancy Care Network in 2005, she graduated from the University of South Florida in 2003 with a Bachelor of Arts in Political Science and a minor in Economics.<sup>139</sup> She later received her bachelor's degree in ministry from the River Bible Institute in 2015. The River Bible Institute was established in 1997 by Rodney Howard-Browne and his wife Adonica Howard-Browne. In addition to the River Bible Institute, Howard-Browne and his wife established the church The River at Tampa Bay Church in Tampa, Florida, Revival Ministries International, River School of Worship and River School of Government.<sup>140</sup>



Amber Kelly Butler

Howard-Browne built a cult-like following with his methods, which have been criticized by other members of the faith community,<sup>141</sup> and he was criticized in 1999 for his handling of legal entanglements involving The River church, including a bible studies teacher charged with molesting an 8 year old.<sup>142</sup> Howard-Browne has a history of promoting conspiracy theories<sup>143</sup> and attacks on other religions based on racism.<sup>144</sup> While hosting a rally for candidate Newt Gingrich, Howard-Browne called for a Christian American uprising “that will not sit idly by... allow[ing] Islam to take over this country.”<sup>145</sup> In 2017, during a meeting with President Trump and conservative pastors, Howard-Browne led the group in praying over the President.<sup>146</sup> In a video posted after the meeting, Howard-Browne went on to say:

“[t]here is a planned attack on our president... and that’s all I can tell you about right now; I know what I’m talking about, I’ve spoken to high-ranking people in the government and this is being

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<sup>139</sup> Amber Kelly, *Education*, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/amber-kelly-8571722/>.

<sup>140</sup> About the River Bible Institute, *Other River Institutes*, RIBERBIBLEINSTITUTE.COM (last accessed Nov. 19, 2020), available at <https://www.riverbibleinstitute.com/about-rbi>.

<sup>141</sup> Michelle Bearden, *The Holy Ghost Bartender*, THE TAMPA TRIBUNE (last accessed Nov. 19, 2020), available at <https://web.archive.org/web/20120707031815/http://tampabayonline.net/reports/minister/homealt.htm>.

<sup>142</sup> Christian News Today, *Dr. Rodney Howard-Browne’s Bible Studies Teacher Charged with Lewd Acts*, DECEPTIONINTHECHURCH.COM (1999), available at <http://www.deceptioninthechurch.com/lewd.html>.

<sup>143</sup> Rodney Howard Browne: Hollywood Execs are ‘Full of the Devil,’ ‘Drink the Blood of Young Kids’, CHARISMA NEWS (Oct. 20, 2017), available at <https://www.charismanews.com/video/67850-rodney-howard-browne-hollywood-execs-are-full-of-the-devil-drink-the-blood-of-young-kids>.

<sup>144</sup> Brad Reed, *Megachurch Pastor Who Was Invited to Trump’s White House Declares New Zealand Terror Attack a ‘False Flag’*, RAWSTORY (Mar. 15, 2019), available at <https://www.rawstory.com/2019/03/megachurch-pastor-invited-trumps-white-house-declares-new-zealand-terror-attack-false-flag/>.

<sup>145</sup> Mail & Guardian, *God’s Bartender in Good Spirits*, MAIL & GUARDIAN (Mar. 16, 2012), available at <https://mg.co.za/article/2012-03-16-gods-bartender-in-good-spirits/>.

<sup>146</sup> Kyle Mantyla, *Rodney Howard-Browne Prayed Over Trump in Order to Avert ‘A Planned Attack on Our President’*, RIGHT WING WATCH (Jul. 17, 2017), available at <https://www.rightwingwatch.org/post/rodney-howard-browne-prayed-over-trump-in-order-to-avert-a-planned-attack-on-our-president/>.

planned by people that hate God, hate America, hate our president and we have to stop this, in Jesus name.”<sup>147</sup>

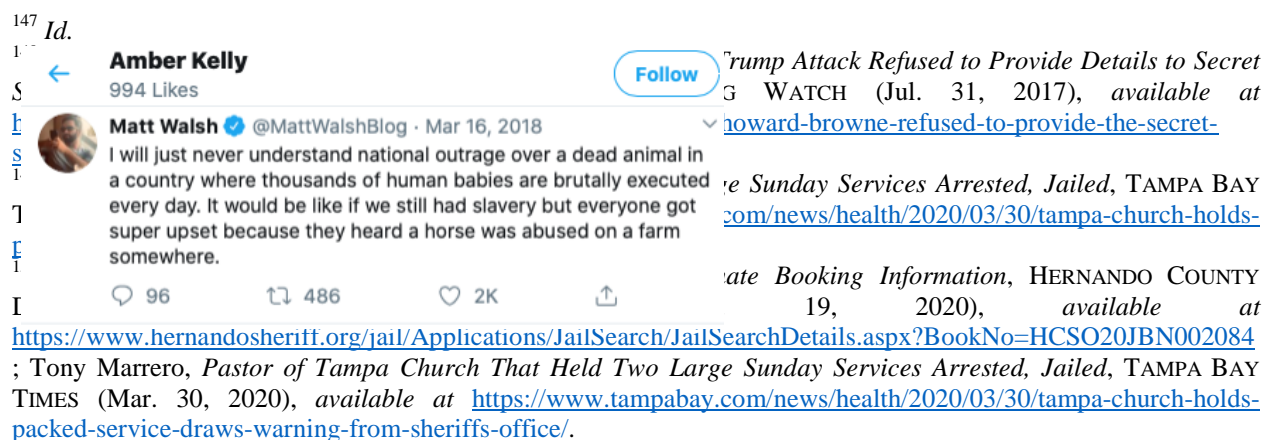
During an interview Howard-Browne claimed the Secret Service had visited him and asked him to explain the accusations made in the video he posted. During the interview, Howard-Browne explained, “[i]f the Secret Service in Washington, D.C., don’t know what’s coming down, then why should somebody from Tampa... It’s not my problem.”<sup>148</sup>

Most recently, Howard-Browne made national headlines for promoting COVID-19 conspiracy theories. In March 2020, Howard-Browne conducted two religious services for packed audiences at The River church despite a stay-at-home order in Hillsborough County, where the church is located.<sup>149</sup> Howard-Browne was arrested on charges of unlawful assembly and violating the County’s order but posted bond thirty minutes later.<sup>150</sup>

Butler previously worked for the Florida Family Policy Council (FFPC) as the Director of Policy and Communications; the FFPC works toward “A Nation Where God is Honored, Life is Cherished, Families Thrive and Religious Liberty Flourishes.”<sup>151</sup> She wrote weekly legislative reports for Florida Family Action, the PAC partner organization of the FFPC.<sup>152</sup>



According to her LinkedIn, Butler currently serves as the Chief of External Affairs at the Florida Department of Education’s Division of Blind Services.<sup>153</sup> Across social media platforms



<sup>147</sup> *Id.*  
<sup>148</sup> *Id.*  
<sup>149</sup> *Id.*  
<sup>150</sup> *Id.*  
<sup>151</sup> Who We Are, About FFPC, FLORIDA FAMILY POLICY COUNCIL (last accessed Nov. 19, 2020), available at <https://www.flfamily.org/about-ffpc>.

<sup>152</sup> Amber Kelly, FFA News, FLORIDA FAMILY ACTION (last accessed Nov. 19, 2020), available at <https://floridafamilyaction.org/tag/amber-kelly/>.

<sup>153</sup> Amber Kelly, Experience, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/amber-kelly-8571722/>.

like Facebook and Twitter, Butler has posted and circulated transphobic, homophobic, anti-immigrant, and anti-abortion content, including one tweet in which she assures transgender individuals that “there is hope” because “God did not make a mistake” while promoting a video indicating individuals identifying as trans can change their identity.<sup>154</sup> She liked a tweet comparing abortion to slavery.<sup>155</sup>

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<sup>154</sup> Amber Kelly @AmberForTruth, TWITTER (Jul. 28, 2017), *available at* <https://twitter.com/AmberForTruth/status/891090338470907909>.

<sup>155</sup> Matt Walsh, @MattWalshBlog, TWITTER (Mar. 16, 2018), *available at* <https://twitter.com/MattWalshBlog/status/974744812673957888>.

### **Teresa Cooper Ward (Board Member)**



Teresa Cooper Ward is a Florida-based lawyer. Ward has practiced law at Dennis, Jackson, Martin & Fontela since 2014.<sup>156</sup> Before that, she was Deputy General Counsel for the Florida House of Representatives Office of the General Counsel.<sup>157</sup> Ward represented former Florida State Representative Doug Holder when he became embroiled in a financial disclosure legal entanglement.<sup>158</sup>

Originally from Columbus, Ohio, Ward graduated from the University of South Florida with a Bachelor of Arts in 1977 and later graduated with a J.D. from Stetson University College of Law in

1981.<sup>159</sup> Ward is

Teresa Cooper Ward

involved with numerous Christian groups,

including the National Legal Christian Society and the St. Petersburg chapter of the Christian Legal Society of which she was once president.<sup>160</sup>

In 2003, Ward cosigned a letter<sup>161</sup> from Children of God for Life, a religious anti-abortion nonprofit, to President George W. Bush urging him to ban the use of abortion-derived fetal cells in vaccine development. Despite lifesaving contributions of research using fetal tissue in medical science, the letter compares the practice to the use of “cell lines taken from Nazi experiments on the Jews.”<sup>162</sup> Ward signed the letter as a “P.F.E.H.C. Advisory Board” member.<sup>163</sup> Further investigation showed Children of God for Life’s Vice President, Jay Carpenter, established an organization titled Professionals for Excellence in Health Care, “a group of physicians, attorneys, nurses, pharmacists, and related health care professionals dedicated to the ethical treatment of persons, born and unborn.”<sup>164</sup> An internet search reveals no references to P.F.E.H.C.

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<sup>156</sup> Teresa Cooper Ward, *Experience*, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/teresa-cooper-ward-80b52411/>.

<sup>157</sup> George T. Levesque and Teresa Cooper Ward, *Dual Office Holding; Conflicts of Interest*, THE FLORIDA HOUSE OF REPRESENTATIVES: OFFICE OF THE GENERAL COUNSEL (Nov. 4, 2011), available at [https://sb.flleg.gov/nxt/gateway.dll/Opinions/Legislative%20Conduct%20Opinions/new%20opinions%20received%20after%20september%202006/house%20general%20counsel/opinion11-11.pdf?fn=document-frame.htm\\$f=templates\\$3.0](https://sb.flleg.gov/nxt/gateway.dll/Opinions/Legislative%20Conduct%20Opinions/new%20opinions%20received%20after%20september%202006/house%20general%20counsel/opinion11-11.pdf?fn=document-frame.htm$f=templates$3.0).

<sup>158</sup> Zac Anderson, *Former Lawmaker to Amend Financial Disclosure Documents*, Herald-Tribune (Apr. 20, 2016), available at <https://www.heraldtribune.com/article/LK/20160420/News/605206271/SH>.

<sup>159</sup> Teresa Cooper Ward, *Education*, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/teresa-cooper-ward-80b52411/>.

<sup>160</sup> Counsel Attorney Teresa Cooper Ward, *Tallahassee, Florida Lawyers*, LAWYERBD.COM (last accessed Nov. 19, 2020), available at <http://www.lawyerdb.org/Lawyer/Teresa-Cooper-Ward/>.

<sup>161</sup> Children of God for Life, *Letter sent to President Bush*, CHILDREN OF GOD FOR LIFE (Mar. 25, 2003), available at <https://cogforlife.org/2003/03/25/letter-sent-to-president-bush/>.

<sup>162</sup> *Id.*

<sup>163</sup> *Id.*

<sup>164</sup> Children of God for Life, *Board Members*, CHILDREN OF GOD FOR LIFE (Mar. 25, 2003), available at <https://cogforlife.org/board-members/>.

In 2005, Ward ran to become chair of the Pinellas County Republican Party. After the Tampa Bay Times wrote an article regarding the party's abortion platform, Ward wrote a scathing letter to the editor in response<sup>165</sup> to correct the article and state that she had, "worked hard to establish [her]self as an ardent pro-life worker" and the "Republican Party does not have an 'abortion rights' platform." Instead, the party "believe[s] the unborn child has a fundamental individual right to live which cannot be infringed."<sup>166</sup>

The anti-abortion movement has a long history of racism and ties to white supremacy.<sup>167</sup> Ward promotes similar ideas. In 2009, Ward expressed public support for the "birther" attacks against President Barack Obama.<sup>168</sup> She expressed public support for Dr. Orly Taitz, and *Barnett v. Obama*, a lawsuit filed by Dr. Taitz on behalf of federal presidential candidates alleging President Obama as ineligible to be president. U.S. District Court Judge David O. Carter dismissed the lawsuit on October 29, 2009<sup>169</sup> and Dr. Taitz faced criticism of her legal abilities and ethics, including claims that she forced witnesses to lie under oath.<sup>170</sup>

On Twitter, Ward has tweeted her support of legislation "protecting unborn children"<sup>171</sup> and support of arming school teachers to respond to mass school shootings.<sup>172</sup> Ward has also posted and retweeted articles from far-right news outlets like *The American Spectator* and



<sup>165</sup> Teresa Cooper Ward, *Column Misrepresented a Plank of GOP Platform*, TAMPA BAY TIMES (Oct. 8, 2005), available at <https://www.tampabay.com/archive/1994/12/21/column-misrepresented-a-plank-of-gop-platform/?outputType=amp>.

<sup>166</sup> *Id.*

<sup>167</sup> Alex DiBranco, *The Long History of the Anti-Abortion Movement's Link to White Supremacy*, THE NATION (Feb. 3, 2020), available at <https://www.thenation.com/article/politics/anti-abortion-white-supremacy/>.

<sup>168</sup> Attorney Teresa Ward, *Congrats Due Only to Orly Alone. Good Work., DR. ORLY TAITZ, ESQUIRE: DEFEND OUR FREEDOMS FOUNDATION DOFF* (Oct. 7, 2009), available at <http://www.orlytaitzesq.com/from-attorney-teresa-ward/#comments>.

<sup>169</sup> Order Regarding Defendants' Motion to Dismiss, SACV 09-0082 (Oct. 29, 2009), available at [https://web.archive.org/web/20100528001143/http://www.cacd.uscourts.gov/CACD/RecentPubOp.nsf/bb61c530eab0911c882567cf005ac6f9/8fc0c9eea056e9e78825765e005ccf99/\\$FILE/SA09CV00082%20DOC\(ANx\).pdf](https://web.archive.org/web/20100528001143/http://www.cacd.uscourts.gov/CACD/RecentPubOp.nsf/bb61c530eab0911c882567cf005ac6f9/8fc0c9eea056e9e78825765e005ccf99/$FILE/SA09CV00082%20DOC(ANx).pdf).

<sup>170</sup> Rachel Weiner, *Birther Lawsuit Witnesses: Orly Taitz Told Us to Lie*, HUFFPOST (Mar. 18, 2010), available at [https://www.huffpost.com/entry/birther-lawsuit-witnesses\\_n\\_355550](https://www.huffpost.com/entry/birther-lawsuit-witnesses_n_355550).

<sup>171</sup> Teresa Ward, @TerriCooperWard, TWITTER (Jan. 11, 2017), available at <https://twitter.com/TerriCooperWard/status/819300917644300289>.

<sup>172</sup> Richard Corcoran, @richardcorcoran, TWITTER (Feb. 26, 2018), available at <https://twitter.com/richardcorcoran/status/968199044538552320?s=20>.

*Breitbart*, including a retweet of Joel Pollak, Senior Editor at *Breitbart News*, labeling President Donald Trump's pardon of the Sheriff Joe Arpaio for criminal contempt of court<sup>173</sup> as "awesome."<sup>174</sup> Sheriff Joe Arpaio is best known for his racial profiling when detaining individuals based "solely on the suspicion that they were in the country illegally, and turning them over to the immigration authorities."<sup>175</sup>

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<sup>173</sup> Jesse Byrnes and Jonathan Easley, *Trump Pardons Former Sheriff Joe Arpaio*, THE HILL (Aug. 25, 2017), available at <https://thehill.com/homenews/administration/348061-trump-pardons-arpaio>.

<sup>174</sup> Joel Pollak, @joelpollak, TWITTER (Aug. 28, 2017), available at <https://twitter.com/joelpollak/status/902365806956183553?s=20>; John Nolte, *Nolte: 3 Reasons Trump's Pardon of Sheriff Joe Arpaio is Awesome*, BREITBART (Aug. 28, 2017), available at <https://www.breitbart.com/politics/2017/08/28/nolte-3-reasons-trumps-pardon-of-sheriff-joe-arpaio-is-awesome/>.

<sup>175</sup> Richard Pérez-Peña, *Former Arizona Sheriff Joe Arpaio is Convicted of Criminal Contempt*, The New York Times (Jul. 31, 2017), available at <https://www.nytimes.com/2017/07/31/us/sheriff-joe-arpaio-convicted-arizona.html>.

### **Rita Gagliano (Executive Director)**



Network in 2018.<sup>177</sup>

Rita Gagliano

Rita M. Gagliano currently serves as the Executive Director of Florida Pregnancy Care Network.<sup>176</sup> Gagliano graduated from Franciscan University of Steubenville with a Bachelor of Arts in Theology in 1991. After working as a theology teacher from 1991-1998, Gagliano served as a Family Life Coordinator for the Catholic Diocese of Savannah in 1999. Then, after working in college admissions for Savannah College of Art and Design and Thomas University from 2000-2018, Gagliano joined Florida Pregnancy Care

On her active Twitter account, Gagliano has liked and retweeted scores of posts featuring vitriolic anti-abortion and anti-immigrant sentiments, COVID-19 denialism, mail-in voting fraud conspiracies, and anti-vaxxer rhetoric.<sup>178</sup>



### **Susan Grimsley (Former Executive Director)**



<sup>176</sup> Rita Gagliano, *Experience*, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/rita-gagliano-00b44b165/>.

<sup>177</sup> *Id.*

<sup>178</sup> Rita Gagliano, *Likes: @RitaGagliano2*, TWITTER (last accessed Nov. 19, 2020), available at <https://twitter.com/RitaGagliano2/likes>.



Susan Grimsley

Susan Elkins Grimsley joined the FPCN board as Executive Director in 2007.<sup>179</sup> Grimsley represented Florida Pregnancy Care Network at a 2018 “Pro-Family Banquet” held by the Florida Family Policy Council<sup>180</sup>, intending to honor “life-affirming pregnancy centers throughout Florida.”<sup>181</sup> FFPC held its event as an opportunity for celebration; everyone in attendance anticipated the eventual signing of legislation guaranteeing “up to \$4 million per year to pregnancy centers through the state’s Department of Health.” As Grimsley was quoted at the time, “[FPCN had] simply been a budget line item and had to be approved every year. Being in statute gives the program much more permanence.”<sup>182</sup>

Grimsley and other “representatives of numerous outstanding Pro-life ministries” met with anti-abortion figure Jim Pinto<sup>183</sup> in 2009.<sup>184</sup> In a 2016 blog post about a fire at FPCN’s office building, Grimsley said of the accident, “God is good—He brings beauty from ashes and that’s what we’re counting on.”<sup>185</sup>

### **Ingrid Delgado (Board Member)**

Ingrid Delgado, a prominent Florida Catholic anti-death penalty advocate and a fervent, lifelong anti-abortion supporter, has been a board member of Florida Pregnancy Care Network since 2018.<sup>186</sup>

Delgado is an Associate Director for Social Concerns/Respect Life<sup>187</sup> with the Florida Conference of Catholic Bishops, which has an



Ingrid Delgado

<sup>179</sup> Florida Pregnancy Care Network, Inc., *FY 2007 Return of Organization Exempt from* V-A (Jun. 9, 2008)

[https://projects.propublica.org/nonprofits/display\\_990/203707766/2008\\_07\\_EO%2F20-5](https://projects.propublica.org/nonprofits/display_990/203707766/2008_07_EO%2F20-5)

<sup>180</sup> Who We Are, *About FFPC*, Florida Family Policy Council (last accessed Nov. 19, 2020), available at <https://www.flfamily.org/about-ffpc>.

<sup>181</sup> Karen Ingle, *Florida Pregnancy Center Leaders Honored at Pro-Family Banquet*, PRI 27, (2018), available at <https://pregnancyhelpnews.com/florida-pregnancy-center-leaders-honored-at-pro-family-banquet>.

<sup>182</sup> *Id.*

<sup>183</sup> Booklets & Media, *A Study Guide to Humanae Vitae – Of Human Life*, AT HOME WITH JIM & JOY (last accessed Nov. 19, 2020), available at <https://www.jimandjoypinto.com/index.html>.

<sup>184</sup> On the Frontlines!, *Jim Pinto, MEV at 40 Days for Life Leaders Meeting*, FRONTLINES (Mar. 2009), available at <http://web.archive.org/web/20100703040623/https://www.priestsforlife.org/frontlines/trip-home.aspx?tripid=179>.

<sup>185</sup> Jay Hobbs, *Florida Pregnancy Care Network Moving on Following Blaze*, PREGNANCY HELP NEWS (Jun. 16, 2016), available at <https://pregnancyhelpnews.com/florida-pregnancy-care-network-moving-on-following-blaze>.

<sup>186</sup> Florida Pregnancy Care Network, Inc., *FY 17/18 Return of Organization Exempt from Income Tax Form 990*, Part VII (Jan. 15, 2020) available at <https://projects.propublica.org/nonprofits/organizations/203707766/202040359349300924/full>.

<sup>187</sup> Florida Conference of Catholic Bishops, *Ingrid M. Delgado: Assoc. Director for Social Concerns/Respect Life*, FLORIDA CONFERENCE OF CATHOLIC BISHOPS (last accessed Nov. 19, 2020), available at <https://flaccb.org/people/ingrid-m-delgado>.

extensive anti-abortion social media presence.<sup>188</sup> At an event where she was presenting the Defensor Vitae (Defender of Life) Award to a Florida legislator, Delgado said, “Protecting the unborn is one of the more challenging issues members of the legislature sponsor and support.”<sup>189</sup>

Delgado has written opinion pieces against Florida legislation that allows children to be indicted as adults in criminal court and advocated for the minimum age to be 14 in order to indict children as adults in Florida.<sup>190</sup> During the COVID-19 pandemic, when accessing an abortion is even more challenging due to unconstitutional state laws and stringent state mandates, Florida passed a law requiring anyone under the age of 18 to have a parent’s consent before accessing abortion care in July 2020.<sup>191</sup> Delgado supported this law as being “common sense,”<sup>192</sup> despite a nearly identical law being struck down by the Florida Supreme Court in 1989.<sup>193</sup>

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<sup>188</sup> Florida Conference of Catholic Bishops, *Culture of Life*, FACEBOOK (Oct. 19, 2020), available at <https://www.facebook.com/flaccb/posts/10160240410473222>.

<sup>189</sup> *Catholic Bishops of Florida Honor Local Legislator with Defender of Life Award*, DIOCESE OF ORLANDO (last accessed Nov. 19, 2020), available at <https://www.orlandodiocese.org/catholic-bishops-of-florida-honor-local-legislator-with-defender-of-life-award/>.

<sup>190</sup> Ingrid Delgado *Young Kids Can Be Prosecuted as Adults in Florida. Raise the Indictment Age*, TALLAHASSEE DEMOCRAT (Apr. 14, 2019), available at <https://www.tallahassee.com/story/opinion/2019/04/14/young-kids-can-prosecuted-adults-florida-opinion/3449384002/>.

<sup>191</sup> *Parental Consent Now Required for Minors Seeking Abortions*, CAPITOL NEWS SERVICES (Jul. 2, 2020), available at <https://www.wjhg.com/2020/07/02/parental-consent-now-required-for-minors-seeking-abortions/>.

<sup>192</sup> *Id.*

<sup>193</sup> Jim Saunders, *Florida Gov. DeSantis Signs Parental Consent for Abortion into Law*, TALLAHASSEE DEMOCRAT (Jun. 30, 2020), available at <https://www.tallahassee.com/story/news/2020/06/30/florida-gov-desantis-signs-parental-consent-abortion-into-law/3285978001/>.

## **Eric Haug (Board Member)**

Eric Sigurd Haug is a Florida-based attorney who has been a board member of Florida Pregnancy Care Network since 2006. According to his LinkedIn page, after graduating from Western Illinois University in 1980 with a Bachelor of Arts in Political Science, Haug attended law school and graduated from Southern Illinois University School of Law with a Juris Doctorate in 1983.<sup>194</sup>



Secretary of State  
the court to prohibit

Haug held various positions before serving as the executive director at Wildwood Church from 2003-2005.<sup>195</sup> Haug then went on to serve as Staff Director and Chief Legislative Analyst for the Florida House of Representatives from 2007 to 2010.<sup>196</sup> In 2011, Haug started his own law and legal consultation practice, Eric S. Haug Law and Consulting, P.A., which he still runs today.<sup>197</sup>

Eric S. Haug

Haug and Eric S. Haug Law & Consulting, P.A. filed a complaint on behalf of the Southeastern Legal Foundation, Inc.<sup>198</sup> – a right-wing nonprofit law firm entrenched with climate change skeptic groups<sup>199</sup> and funded by the Koch brothers<sup>200</sup> – in November 2012, against the Florida and three Florida Supreme Court Justices asking the Secretary of State from placing the Justices

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<sup>194</sup> Eric Haug, *Education*, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/eric-haug-055011a/>.

<sup>195</sup> Eric Haug, *Experience*, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/eric-haug-055011a/>; Wildwood Church (last accessed Nov. 19, 2020), available at <https://wildwoodtlh.com/>.

<sup>196</sup> Eric Haug, *Experience*, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/eric-haug-055011a/>; Legislative Analyst, *Directory of The Florida House of Representatives*, (2008-2010), available at <http://endchildhoodhunger.org/images/FloridaHouseDirectory.pdf>.

<sup>197</sup> *About Eric*, ERIC S. HAUG (last accessed Nov. 19, 2020), available at <http://www.erichaug.com/>.

<sup>198</sup> Petition for Writ of Quo Warranto (Nov. 5, 2012), available at [https://miamiherald.typepad.com/files/filed\\_11-05-2012\\_petition.pdf](https://miamiherald.typepad.com/files/filed_11-05-2012_petition.pdf).

<sup>199</sup> Southeastern Legal Foundation filed a lawsuit against the Environmental Protection Agency (“EPA”) in 2013 which eventually was heard by the U.S. Supreme Court alleging the EPA has overreaching power to regulate greenhouse gas emissions through the Clean Air Act. Mark Walsh, *Did the EPA Go Too Far in Regulating Greenhouse Gases? SCOTUS to Decide*, ABAJournal (Feb. 1, 2014), available at [https://www.abajournal.com/magazine/article/did\\_the\\_epa\\_go\\_too\\_far\\_in\\_regulating\\_greenhouse\\_gases\\_scotus\\_to\\_decide](https://www.abajournal.com/magazine/article/did_the_epa_go_too_far_in_regulating_greenhouse_gases_scotus_to_decide); Southeastern Legal Foundation, *EPA*, EPALawsuit.com (last accessed Nov. 19, 2020), available at <https://epalawsuit.com/>; Southeastern Legal Foundation maintains a webpage dedicated to its EPA lawsuits and the “10 Myths of Global Warming” <https://epalawsuit.com/why-a-lawsuit/>.

<sup>200</sup> Donors Trust, *Background*, DESMOG (last accessed Nov. 19, 2020), available at <https://www.desmogblog.com/who-donors-trust>; Todd Phillips and Andrew Blotky, *The Conservative Takeover of State Judiciaries*, Center for American Progress (Aug. 12, 2012), available at <https://www.americanprogress.org/issues/courts/news/2012/08/13/2011/the-conservative-takeover-of-state-judiciaries/>. Being funded by the Koch network, Southeastern Legal Foundation is also an anti-union organization and has signed on to anti-union amicus briefs in front of the Supreme Court Don McIntosh, *The Janus v. AFSCME Case: What it is, Who’s Behind It*, the STAND (Feb. 15, 2018), available at <https://www.thestand.org/2018/02/the-janus-case-what-it-is-whos-behind-it/>.

on the statewide ballot for the election cycle. The complaint alleged the three Justices failed to comply with Florida election law and were ineligible to be on the ballot.<sup>201</sup> The complaint received criticism for its partisan motivations, given that the case had been investigated months earlier and no wrongdoing was found.<sup>202</sup>

### **Constance “Connie” Moore (Former Board Chair)**

Constance “Connie” Moore served as the Florida Pregnancy Care Network Board President from 2015-2017.<sup>203</sup> During her time on the board, Moore served as the CEO of the Tallahassee-based Pregnancy Help and Information Center, which received \$43,500 in funding from FPCN in the fiscal year ending June 2015. Pregnancy Help and Information Center has as its mission statement “Bring[ing] God's love to protect life, nurture families and promote sexual purity.”<sup>204</sup>



Constance “Connie” Moore      FDA

Since 2014, Moore has worked as a Wellness Advocate for doTerra Essential Oils, a multi-level marketing company that has been formally warned multiple times by the and the FTC for falsely implying their products could assist in preventing or curing autism, Ebola, and, most recently, COVID-19.<sup>205</sup>

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<sup>201</sup> <https://saintpetersblog.com/lawsuit-filed-against-florida-supreme-court-justices-seeks-to-bar-them-from-november-ballot/>

<sup>202</sup> Letter to Dan R. Stengle, Esq. from Barry Richard (May 3, 2012, < available at [https://miamiherald.typepad.com/files/120503\\_-\\_opinion\\_letter\\_to\\_dstengle-1.pdf](https://miamiherald.typepad.com/files/120503_-_opinion_letter_to_dstengle-1.pdf).

<sup>203</sup> Florida Pregnancy Care Network, Inc. FY 16/17 Return of Organization Exempt from Income Tax Form 990 (Feb. 21, 2018), available at <https://projects.propublica.org/nonprofits/organizations/203707766/201820539349300502/full>.

<sup>204</sup> Connie Moore, Experience, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/connie-moore-53548331/>; Florida Pregnancy Care Network, Inc. FY 14/15 Return of Organization Exempt from Income Tax Form 990 (Nov. 17, 2015), available at [https://projects.propublica.org/nonprofits/display\\_990/203707766/2016\\_01\\_EO%2F13-142616\\_32308\\_203707766](https://projects.propublica.org/nonprofits/display_990/203707766/2016_01_EO%2F13-142616_32308_203707766).

<sup>205</sup> Connie Moore, Experience, LINKEDIN (last accessed Nov. 19, 2020), available at <https://www.linkedin.com/in/connie-moore-53548331/>; Rachel Monroe, How Essential Oils Became the Cure for Our Age of Anxiety, The New Yorker (Oct. 2, 2017), available at <https://www.newyorker.com/magazine/2017/10/09/how-essential-oils-became-the-cure-for-our-age-of-anxiety>; Megan Graham, FTC Warns Multilevel Marketing Company Sellers About Coronavirus Health and Earnings Claims, CNBC (Apr. 27, 2020), available at <https://www.cnbc.com/2020/04/27/ftc-warns-doterra-rodan-fields-other-mlm-sellers-on-covid-claims.html>.

## **Conclusion**

The Florida Legislature allocates \$4 million a year of taxpayer funds to the Florida Pregnancy Support Services Program to coerce pregnant people from seeking abortion services. Anti-abortion pregnancy centers receive the majority of taxpayer money through this program and in direct contravention of the law, it appears these centers proselytize while advancing medically inaccurate and dangerous information, all to pressure a pregnant person to carry their pregnancy to term.

Until taxpayers can be assured that these centers conform to ethical standards of licensed medical facilities, offer sound medical advice, and do not lead to harm, the state of Florida should refrain from directly or indirectly funding anti-abortion pregnancy centers.