

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

A Woman's Concern, Inc. d/b/a Your Options  
Medical Centers,

Plaintiff,

vs.

Maura Healey, Governor of Massachusetts,  
sued in her individual and official capacities;  
Robert Goldstein, Commissioner of the  
Massachusetts Department of Public Health,  
sued in his individual and official capacities;  
Reproductive Equity Now Foundation, Inc.;  
Rebecca Hart Holder, Executive Director of  
Reproductive Equity Now Foundation,

Defendants.

C.A. No. 1:24-cv-12131-LTS

**DECLARATION OF CARLA A. REEVES, ESQ. IN SUPPORT OF THE  
REPLY BRIEF OF DEFENDANTS REPRODUCTIVE EQUITY  
NOW FOUNDATION, INC. AND REBECCA HART HOLDER**

I, Carla A. Reeves, Esq., declare as follows:

1. I am an attorney with the law firm of Goulston & Storrs PC, and am counsel of record for Defendants Reproductive Equity Now Foundation, Inc. ("REN") and Rebecca Hart Holder ("Holder") in the above-captioned matter. I am licensed to practice law in the Commonwealth of Massachusetts and am admitted to practice in the United States District Court for the District of Massachusetts. I am familiar with the facts and circumstances of this action.
2. I submit this declaration, along with the exhibit attached hereto, in support of REN and Holder's Reply Brief in support of their Motion to Dismiss the Complaint.
3. Attached hereto as **Exhibit A** is a true and accurate PDF copy of a webpage titled "About anti-abortion centers," which is available at <https://www.mass.gov/info-details/about-anti-abortion-centers>. I last visited this webpage on November 18, 2024. I have highlighted in

yellow the following sentence on page 6 of the PDF: “This map is maintained by Reproductive Equity Now Foundation, a trusted partner of the Massachusetts Department of Public Health.”

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 19, 2024

/s/ Carla A. Reeves  
Carla A. Reeves (BBO #681849)  
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**CERTIFICATE OF SERVICE**

I, Mariana Korsunsky, hereby certify that on November 19, 2024, I caused the foregoing document to be filed electronically using the Court's CM/ECF system, which will send notification of this filing (NEF) to all registered participants. Paper copies will be sent to those indicated as non-registered participants.

/s/ Mariana Korsunsky  
Mariana Korsunsky

# EXHIBIT A

## About anti-abortion centers

Learn about anti-abortion centers, why they are harmful, how to spot one, and where to find trusted comprehensive care.

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### What are anti-abortion centers?



Anti-abortion centers, often called “crisis pregnancy centers,” are facilities or mobile vans that:

- Look like medical facilities but don't offer comprehensive care
- Do not provide information and counseling about all your options if you are pregnant
- Do not provide abortion care or referrals
- May attempt to delay your care and potentially put your health at risk

There are [more than 30 anti-abortion centers in Massachusetts](#)

[https://reproequitynow.org/about-antiabortion-centers#:~:text=List%20of%20Anti%20Abortion%20Centers%20in%20New%20England%3A\).](https://reproequitynow.org/about-antiabortion-centers#:~:text=List%20of%20Anti%20Abortion%20Centers%20in%20New%20England%3A).) Even if you're not looking for an abortion, these centers are not a safe or trusted place to go for reproductive health care.

### How do anti-abortion centers cause harm?

Deceptive advertising:

Anti-abortion centers may advertise themselves as reproductive health care facilities, but do not offer comprehensive care.

They may advertise abortion-related care, but don't provide abortions, counseling on the full range of pregnancy options, or referrals to providers who do. Many put ads on Google so that they appear in search results for abortion or pregnancy-related searches. Some anti-abortion centers operate near comprehensive

reproductive health care clinics. Some even mimic their names and logos to try to look like they are connected.

**Misleading practices:**

Beware of "free" products or services.

Some anti-abortion centers provide free resources like pregnancy tests or ultrasounds to get you in the door. However, they will often mislead you about how far along your pregnancy is. They may offer other free products but may make you participate in classes or programs to access the items.



**Delayed health care:**

Anti-abortion centers may try to delay your care and prevent you from accessing abortion care.

They may delay scheduling your appointments so that you miss the timeframe when you can obtain an abortion. When you call to ask about abortion care, they may require you to come in for an appointment before giving any information, which delays your care.

**Medical disinformation:**

They often provide misinformation about abortion to prevent you from making an informed choice about your care.

This may include false information about access to abortion, promotion of "abortion pill reversal", and exaggerated information about the risks of abortion. In fact, abortion is very safe. Abortion is one of the safest medical procedures; it has a lower complication rate than many other common medical procedures.



**Untrained staff and volunteers:**

Many anti-abortion centers have staff or volunteers who are not trained or licensed medical professionals.

Some may even wear white coats or other attire to look like medical professionals. Staff and volunteers who are not licensed medical professionals may not be required to follow codes of ethics and standards or to keep your records private.

Some staff or volunteers at anti-abortion centers may interpret (read results) of ultrasounds without the required training or medical background to do this. This can lead to inaccurate results about your pregnancy, including how far along your pregnancy is.

**Intentional targeting:**

Many anti-abortion centers purposefully operate and advertise themselves in lower income communities and communities of color, where there may be fewer options for comprehensive reproductive health care.



## How can I spot an anti-abortion center?

Anti-abortion centers purposefully try to look like medical facilities. Learn common warning signs to help you spot them.



### Warning signs online

- The center name includes words like hope, options, or choice/choices
- They use terms like pregnancy resource center, pregnancy help center, pregnancy care center, or women's resource center
- There are negative online reviews from previous patients that warn about the facility
- They advertise free pregnancy tests or services like abortion counseling, pre-abortion screenings, and abortion education, but don't say that they provide abortion services or referrals
- They have information on their website or say they offer "abortion pill reversal"



### Warning signs when you call or visit

- When you call to ask about abortion care, they say they require you to come into the center before they can give an answer about the services they offer
- When you call to ask for an appointment, they tell you that you can schedule one later, or they try to delay an already scheduled appointment
- The facility waiting room has pictures of babies and children
- They try to pressure you into continuing a pregnancy, for example, by providing a small plastic fetus, images of aborted fetuses, or baby clothes

View a list of anti-abortion centers in Massachusetts

(<https://reproequitynow.org/about-antiabortion-centers#:~:text=List%20of%20Anti%2DAbortion%20Centers%20in%20New%20England%3A>)

Learn more about anti-abortion center warning signs

(<https://reproequitynow.org/about-antiabortion-centers>)

## Where can I find a trusted reproductive health provider?



Abortion is safe, legal, and accessible in Massachusetts. You can [search for abortion care using this map](https://reproequitynow.org/find-a-provider-massachusetts?) (<https://reproequitynow.org/find-a-provider-massachusetts?>), which also alerts you to anti-abortion center locations with a "Fake Abortion Clinic" label. **(This map is maintained by the Reproductive Equity Now Foundation, a trusted partner of the Massachusetts Department of Public Health.)**

If you are seeking comprehensive services, [search for a DPH-funded sexual and reproductive health provider](/info-details/sexual-and-reproductive-health-service-locations) (</info-details/sexual-and-reproductive-health-service-locations>). These health care providers offer birth control and emergency contraception (EC) prescriptions, comprehensive pregnancy options counseling and referrals, infertility services, STD/STI testing and treatment, and more.

[Search for a trusted abortion provider](https://reproequitynow.org/find-a-provider-massachusetts)

(<https://reproequitynow.org/find-a-provider-massachusetts>)

[Search for a provider offering additional sexual and reproductive health services](/info-details/sexual-and-reproductive-health-service-locations)

(</info-details/sexual-and-reproductive-health-service-locations>)

## How can I file a complaint?



If you have been harmed by an anti-abortion center or had a concerning experience, you can [file a civil rights complaint online](/how-to/file-a-civil-rights-complaint) (</how-to/file-a-civil-rights-complaint>) with the Attorney General's Civil Rights Division or call [\(617\) 963-2917](tel:6179632917) (<tel:6179632917>).

You can also file a complaint about staff at an anti-abortion center who may have violated standards of professional conduct:

- [Submit a complaint against a physician](/info-details/submit-a-complaint-against-a-physician) (</info-details/submit-a-complaint-against-a-physician>)
- [File a complaint about a nurse](/how-to/file-a-complaint-about-a-nurse) (</how-to/file-a-complaint-about-a-nurse>)
- [File a complaint about a physician assistant or other health care professional](/how-to/file-a-complaint-with-the-bureau-of-health-professions-licensure) (</how-to/file-a-complaint-with-the-bureau-of-health-professions-licensure>)



For free legal advice about lawful abortion, you can call the [Abortion Legal Hotline \(https://reproequitynow.org/hotline\)](https://reproequitynow.org/hotline) at [\(833\) 309-6301 \(tel:8333096301\)](tel:8333096301). The hotline is a free and confidential abortion information resource created by the Massachusetts Attorney General's Office, advocates, and private law firms.

[File a complaint about an anti-abortion center](#)

[\(/how-to/file-a-civil-rights-complaint\)](#)

[Learn more about the Abortion Legal Hotline](#)

<https://reproequitynow.org/hotline>

## Additional resources

[Abortion protections in Massachusetts](#)

[\(/accessing-abortion-care-in-massachusetts\)](#)

Learn more about protections for abortion and reproductive health services in Massachusetts.

[How the Department of Public Health is responding](#)

[\(/news/maintaining-integrity-accessibility-and-transparency-in-repro\)](#)

Learn what the Department of Public Health (DPH) is doing to protect comprehensive reproductive health care access and respond to complaints regarding several anti-abortion centers.

[Consumer Advisory from the Office of the Attorney General](#)

[\(/info-details/anti-abortion-centers-aacs\)](#)

View the Consumer Advisory about anti-abortion centers issued by the Office of the Attorney General.



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

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

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

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