U.S. Department of
JUSTICE

The Biden Administration's Weaponization of the Freedom of Access to Clinic Entrances Act



April 14, 2026

Office of Legal Policy

TABLE OF CONTENTS

I. Executive Summary 1

II. Background 5

A. DOJ's Current Review of the Biden Administration's FACE Act Enforcement 5

B. Overview of the FACE Act 6

III. The Biden DOJ Largely Ignored Pro-Life Groups While Closely Coordinating with Pro-Abortion Groups 7

A. Interactions with Pro-Life Groups 7

B. Interactions with Pro-Abortion Groups 10

i. The Biden DOJ Was Committed to Protecting Abortion Access under the FACE Act 10

ii. The Biden DOJ Sought and Relied on Information from Abortion NGOs, Including Ongoing Monitoring of Pro-Life Americans 11

iii. DOJ Provided NAF Internal Department Information and Coordinated with NAF on Pro-Abortion Outreach and Civil FACE Act Litigation 16

iv. The Biden DOJ Helped Abortion NGOs Obtain Third-Party Grants 19

IV. The Biden DOJ's Inappropriate Prosecutorial Conduct 20

A. *United States v. Gallagher*: The Biden DOJ Claimed to Defense Counsel That It Did Not Keep Information Requested for a Selective Prosecution Defense, Despite Giving Materially Identical Information to NAF 20

B. *United States v. Zastrow*: The Biden DOJ Allowed Abortion NGOs to Drive Charging Decisions and Engaged in Blatant Anti-Christian Bias in the Jury Pool 22

C. *United States v. Houck*: The Biden DOJ Used Aggressive Arrest Tactics Against a Pro-Life Defendant Who Was Subsequently Acquitted 29

V. The Biden DOJ's Charging and Sentencing Disparities 31

VI. The Trump Administration's Work to Right Prior Wrongs 36

I. EXECUTIVE SUMMARY

The Department of Justice was tasked with implementing E.O. 14202, *Eradicating Anti-Christian Bias*, and Attorney General Pamela Bondi's February 5, 2025 Memorandum, *Restoring the Integrity and Credibility of the Department of Justice*.[1] Both of those leadership instructions charged DOJ with assessing the underlying prosecutorial decisions under the Freedom of Access to Clinic Entrances (FACE) Act. Separately, President Trump pardoned numerous peaceful, pro-life defendants.[2] In response to these directives and following those pardons, DOJ conducted a thorough review of internal discussions, case files, and prosecutorial decisions. DOJ has concluded that the Biden DOJ weaponized the FACE Act in several key ways.

Key Finding 1: The Biden DOJ violated the rights of Americans by its biased enforcement of the FACE Act.

Former Attorney General Merrick Garland revived the National Task Force on Violence Against Reproductive Health Care Providers (Task Force) to weaponize the FACE Act.[3] Though the FACE Act was supposed to protect both pro-choice and pro-life facilities, Biden DOJ senior leadership[4] and Task Force Members provided extensive support to abortion clinics,[5] yet the Biden DOJ often ignored and downplayed vandalism and attacks against pregnancy resource centers or houses of worship.

The Task Force, composed primarily of DOJ's Civil Rights Division (CRT) career attorneys, oversaw the FACE Act and related outreach. Task Force leadership handled most of DOJ's communication with outside groups and victims of alleged FACE Act violations. The Task Force Director was in regular, ongoing contact with pro-abortion non-governmental organizations (NGOs) and the clinics they represented, but disregarded pro-life groups.

Pro-abortion groups capitalized on their relationship with the Task Force to gain internal information and push targets for FACE Act enforcement. The Task Force Director was on texting terms with the National Abortion Federation's (NAF) Security Team and regularly communicated with Planned Parenthood Federation of America and the Feminist Majority Foundation (FMF). The Task Force viewed NAF's Security Team as an "MVP" at flagging protests for DOJ's "attention, often in real-time, which usually result[ed] in an investigation/prosecution."

---

[1] Executive Order 14202, *Eradicating Anti-Christian Bias*, 90 Fed. Reg. 9365 (Feb. 12, 2025); Memorandum For All Department Employees, *Restoring the Integrity and Credibility of the Department of Justice* (Feb. 5, 2025), https://perma.cc/KB3W-A8SS.

[2] Donald J. Trump, *Executive Grant of Clemency* (Jan. 23, 2025), https://perma.cc/2GJ9-L6Q7.

[3] *See* Archives: U.S. Dep't of Just., *Reproductive Rights* (2022), https://perma.cc/9YQ3-L7HZ.

[4] *See* Archives: U.S. Dep't of Just., *Justice Department Announces Reproductive Rights Task Force* (July 12, 2022), https://perma.cc/542N-UQ6R (announcing the establishment of the Reproductive Rights Task Force, chaired by former Associate Attorney General Vanita Gupta, to formalize existing DOJ efforts to "protect access to reproductive health care in anticipation of the Supreme Court overturning *Roe v. Wade*).

[5] *See, e.g.*, "Resource Booklet for Reproductive Health Care Providers and Their Staff," National Task Force of Violence Against Reproductive Health Care Providers (Nov. 7, 2022), *available at* https://perma.cc/CMJ6-3EC6, at 11 (describing the FACE Act only in terms of protection to abortion clinics).

Task Force attorneys did not communicate with any pregnancy resource center groups or representatives until September 2022, well after the increase in violence after the Supreme Court's decision in *Dobbs*.[6] After that time, CRT identified possible contacts for pregnancy resource centers via a quick Google search and directed Task Force leadership to schedule meetings. The Task Force then had several meetings with the pro-life groups identified through that initial outreach and periodically sent them press releases. However, internally, CRT attorneys questioned whether to provide pregnancy resource centers with the same resources as abortion clinics, questioning whether these facilities fall under the FACE Act's scope.

Key Finding 2: The Biden DOJ collaborated with pro-abortion groups to track pro-life activists' First Amendment activity.

The Task Force affirmatively asked the abortion groups about pro-life individuals' travel and constitutionally protected advocacy. The pro-abortion groups even asked the Biden DOJ to target a pro-life religious order, the Franciscan Brothers of Peace. The FBI flagged that the abortion groups' outreach tracked pro-life groups' "1st Amendment protected activity." Yet, the Task Force did not relent, even after this warning.

Abortion NGOs routinely contacted CRT about protests at clinics and possible, alleged FACE Act violations across the country. The Task Force Director "monitored" pro-life activists for years before charging them. This monitoring included three of the pardoned defendants. During the investigations of the later pardoned cases, the NGOs sent DOJ "security reports" or "dossiers" on the activities of the pro-life activists and their personal information. For example, in 2021, before an annual conference by a pro-life group, one pro-choice NGO sent the Task Force Director and the FBI a 137-page memorandum on the conference schedule, lodging, and multi-page dossiers on numerous "anti-choice individuals," including many of the pardoned defendants. These dossiers contained personally identifying information, such as addresses, photographs (including of spouses and minor children), names of associates and affiliated ministries, information about their upcoming travel plans or planned protests, and even drivers' license numbers.

NGOs repeatedly complained about one of the pardoned defendants, provided real-time updates of her pro-life activism, and requested that DOJ pursue nationwide injunctions against pro-life activities, citing this woman's protests as justification. The Biden DOJ investigated this woman's conduct around the country until one of the United States Attorney's Offices brought charges. After her conviction and lengthy sentence, the NGOs stopped complaining about her.

In each of the later-pardoned FACE Act cases, DOJ and the FBI learned of the possible FACE violations from abortion NGOs, rather than from the purported victims or local law enforcement. NAF typically informed the Task Force Director in real time of ongoing protests, often before local law enforcement could fully respond. At his request, NGOs compiled evidence that ultimately gave rise to search warrants and charges. The Task Force also coordinated with the abortion NGOs on civil actions against pro-life activities at clinics.

[6] *Dobbs v. Jackson Women's Health Organization*, 597 U.S. 215 (2022).

Key Finding 3: Biden DOJ prosecutors engaged in inappropriate conduct and comments.

The Biden DOJ prosecutors knowingly withheld evidence that defense counsel requested to prepare an affirmative defense. The Biden DOJ prosecutors falsely claimed to not have such information available. In *United States v. Gallagher* (Middle District of Tennessee), defense counsel contacted federal prosecutors, requesting historical data on FACE Act prosecutions to prepare their selective prosecution defense. The Task Force Director declined, stating that he did not "keep the[se] kind of records" and did not believe that the Department "will provide them." Notably, he had this information readily available and decided not to share it with the defendants, despite sharing substantially identical information with NAF.

The Biden DOJ prosecutors tried to screen out jurors based on religion. In *United States v. Zastrow* (Eastern District of Michigan), Assistant United States Attorneys (AUSAs) looked for ways to screen possible jurors based on their conservative or religious views, while not inquiring about liberal counterviews. They referred to Christian pro-life views as "culty" and lambasted the defendants' beliefs in the courtroom. The AUSAs also complained that they "ended up with a very Catholic magistrate on duty this week and he was very particular about the bond conditions and not infringing on [defendants'] first amendment rights."

The Biden DOJ used the FACE Act to prosecute a father whose minor son was attacked by an abortion clinic worker—and DOJ lost. In *United States v. Houck* (Eastern District of Pennsylvania), prosecutors considered and declined a request for the defendant to self-surrender. Rather, 16 FBI agents arrested the defendant at his home. When faced with public backlash about the aggressive arrest, the Task Force Director attempted to blame the FBI, rather than address the Biden DOJ's lack of initial guidance to law enforcement. The jury ultimately found Houck not guilty, and DOJ settled a civil claim to compensate for the Biden DOJ's misconduct.

Key Finding 4: The Biden DOJ pursued more severe charges and significantly harsher sentences for peaceful pro-life defendants than violent pro-abortion defendants.

The Biden DOJ requested an average sentence of 26.8 months for pro-life defendants, compared to 12.3 months for pro-choice defendants. The Biden DOJ pursued significantly higher sentences (near the top range of sentencing guidelines) for pro-life defendants, while pursuing more lenient sentences against the handful of pro-abortion defendants that it charged. Pro-life defendants were ultimately sentenced to an average of 14 months, while pro-abortion defendants were sentenced to an average of 3 months.

Key Finding 5: The Biden DOJ sought to provide funding to pro-abortion groups.

The Task Force Director served as a reference on NAF's application for a large, private grant. We found no record of ethics approval for a DOJ attorney to take an interest in the financial outcome of a party having business before the Biden DOJ. Indeed, it is doubtful that the Biden DOJ could validly give any such ethical clearance for this conflict of interest.[7]

[7] *See* U.S. Dep't of Just., Ethics Handbook for On and Off-Duty Conduct (Nov. 2024), https://perma.cc/53NY-NQBW.

Current Actions: The Biden DOJ's actions were wrong. The Trump Administration and Department of Justice are committed to rectifying these harms.

President Trump issued full and unconditional pardons to many of the pro-life Christians unfairly targeted by the Biden DOJ. And DOJ leadership dismissed, with prejudice, three of the civil lawsuits against non-violent pro-life demonstrators and issued a directive that, moving forward, DOJ prosecutors may only bring FACE Act civil actions and prosecutions in extraordinary circumstances or in cases presenting significant aggravating factors.[8]

This report does not disclose any findings regarding internal misconduct investigations of any of the employees alleged to have been involved in the weaponization of the FACE Act. DOJ governs the conduct of its current employees through an internal disciplinary investigative system. Where appropriate, DOJ may refer current or former employees for criminal prosecution. Likewise, DOJ may refer current or former employees to the relevant bar association or highest judicial authority of the jurisdictions in which they are licensed to address compliance with applicable Rules of Professional Conduct. Here, appropriate internal referrals have been made as required by the Justice Manual.[9] DOJ adheres to the use of these separate systems to address allegations of misconduct.

[8] U.S. DEP'T OF JUST., OFF. OF THE ASSOCIATE ATTORNEY GENERAL, FACE ACT CHARGING POLICY (Jan. 24, 2025), https://perma.cc/U7HK-37PT (directing CRT to dismiss, with prejudice, the following FACE Act cases: *United States v. Connolly*, No. 2:24-cv-04467 (E.D. Penn.); *United States v. Zastrow, et al.*, No. 2:24-cv-00576 (M.D. Fla.); *United States v. Citizens for a Pro-Life Soc'y*, et al., No. 1:24-cv-00893 (N.D. Ohio)).

[9] U.S. Dep't of Just., Just. Manual § 1-4.000 - Standards Of Conduct, https://perma.cc/L3GU-6SPS.

II. BACKGROUND

A. DOJ's Current Review of the Biden Administration's FACE Act Enforcement

On January 23, 2025, President Trump issued full and unconditional pardons of pro-life defendants in five different matters, raising concerns that during the Biden Administration, DOJ had unevenly applied its enforcement authorities.[10] DOJ is tasked with implementing Executive Order 14202, *Eradicating Anti-Christian Bias*, and Attorney General Pamela Bondi's Memorandum, *Restoring the Integrity and Credibility of the Department of Justice*.[11] Both of those leadership instructions charge DOJ with assessing the underlying prosecutorial decisions under the FACE Act.

In response, DOJ reviewed past cases and conduct for possible anti-Christian bias or broader weaponization concerns. DOJ leadership invited feedback from the United States Attorney's Offices (USAO) that handled the pardoned FACE Act cases and the *Houck* matter. Reviewers asked open-ended questions and received substantive feedback from one USAO, which reviewed its prosecution file and flagged concerns that the prosecution may have been overly politicized in response to the Texas Heartbeat law.[12] The office noted that several in-court AUSA statements suggested that religious discrimination played a role and merited further review.

Based on initial findings and this feedback from the USAO, DOJ conducted a search for responsive documents from possible custodians in CRT. Those search terms yielded about 700,000 results. Both career attorneys and political appointees reviewed the documents and compiled these findings based on the full scope of the data set.

The reviewers proceeded with several guiding presumptions: First, DOJ presumed that attorneys followed the chain of command and did their jobs. Second, DOJ recognized that components regularly interact with outside groups and receive leads regarding possible criminal violations or areas for civil involvement. Likewise, investigations of possible crimes necessarily require back-and-forth communications with victims or their representatives. Third, because changing administrations have different policy preferences and goals, DOJ did not find it surprising or notable that the types of prosecutorial priorities may shift over time. Rather, DOJ's review asked if there were notable departures from past practices or departmental policies for the purpose of using prosecutorial power as a weapon or to target specific persons or groups for improper reasons.

This report shares key findings, including citations to numerous internal documents containing predecisional and deliberative discussions where necessary, to demonstrate where weaponization occurred. The exhibits also include correspondence with outside groups on both sides of the abortion issue.

---

[10] Donald J. Trump, *Executive Grant of Clemency* (Jan. 23, 2025), https://perma.cc/2GJ9-L6Q7.

[11] Exec. Order 14202, *Eradicating Anti-Christian Bias*, 90 Fed. Reg. 9365 (Feb. 12, 2025); Memorandum For All Department Employees, *Restoring the Integrity and Credibility of the Department of Justice* (Feb. 5, 2025), https://perma.cc/KB3W-A8SS.

[12] Senate Bill 8, 87th Leg., Reg. Sess. (Tex. 2021).

Because of the Trump Administration's commitment to transparency, Acting Attorney General Blanche has approved disclosure of documents revealing the abuse of the deliberative process privilege in these prosecutions.[13] DOJ strived to keep redactions minimal, focusing on personal identifying information, including email addresses, phone numbers, and physical addresses and locations. The exhibits are representative of DOJ's full findings regarding implementation of the FACE Act.

B. Overview of the FACE Act

The FACE Act is a viewpoint neutral law that protects access to religious institutions and certain healthcare facilities, including abortion clinics and pregnancy resource centers, regardless of whether the views or services align with an administration's policy preferences regarding abortion. Specifically, the FACE Act makes it unlawful to:

> (1) by force or threat of force or by physical obstruction, intentionally injure[], intimidate[] or interfere[] with or attempt[] to injure, intimidate or interfere with any person because that person is or has been, or in order to intimidate such person or any other person or any class of persons from, obtaining or providing reproductive health services;
>
> (2) by force or threat of force or by physical obstruction, intentionally injure[], intimidate[] or interfere[] with or attempt[] to injure, intimidate or interfere with any person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship; or
>
> (3) intentionally damage[] or destroy[] the property of a facility, or attempt[] to do so, because such facility provides reproductive health services, or intentionally damage[] or destroy[] the property of a place of religious worship.[14]

FACE Act violations are punishable by criminal fines and/or terms of imprisonment, including a maximum term of up to six months for a first "offense involving exclusively a nonviolent physical obstruction" and up to one year for any other first offense.[15]

DOJ is responsible for prosecuting crime in a manner that is consistent with its mission "to uphold the rule of law, to keep our country safe, and to protect civil rights."[16] It must act with

---

[13] All discussion, citation, and provision of internal information in this report is disclosed pursuant to the authority and approval of the Attorney General. The limited release of this information does not constitute the waiver of privilege beyond the limited disclosure here. The limited release of information in this report does not constitute an authorization to any current or former employee to discuss internal or privileged information or to be subject to serve as a witness. DOJ's *Touhy* regulations continue to apply. 28 C.F.R. §§ 16.21, *et seq.*; *United States ex rel. Touhy v. Regan*, 340 U.S. 462 (1951).

[14] 18 U.S.C. § 248(a)(1)-(3).

[15] 18 U.S.C. § 248(b)(1)-(2).

[16] *About DOJ*, U.S. DEP'T OF JUST., https://www.justice.gov/about (last visited Jan. 7, 2026).

independence, impartiality, honesty, integrity, excellence, and respect, valuing "differences in people and in ideas and treat[ing] everyone with fairness, dignity, and compassion."[17]

The FACE Act is also subject to civil enforcement. DOJ may secure injunctive relief such as establishing buffer zones. DOJ may also seek monetary damages.[18]

III. THE BIDEN DOJ LARGELY IGNORED PRO-LIFE GROUPS WHILE CLOSELY COORDINATING WITH PRO-ABORTION GROUPS

DOJ and its attorneys regularly communicate with individuals and groups outside the federal government. DOJ and the FBI regularly receive tips and leads regarding possible criminal violations. Aggrieved individuals file complaints about possible violations of their civil rights. Groups reach out with requests for federal involvement in their civil litigation. It is unremarkable that DOJ was in touch with both pro-life and pro-abortion groups during the Biden Administration. However, although both groups contacted CRT with concerns of possible criminal violations, the Biden DOJ treated the groups and their concerns unequally.

A. Interactions with Pro-Life Groups

The Biden DOJ's interactions with pro-life groups were limited. In August 2022, several months after *Dobbs*, the American Center for Law and Justice sent a letter to DOJ raising concerns that pregnancy resource centers had been "firebombed and vandalized" across the nation, and reiterating that such facilities are covered by the FACE Act.[19] A CRT attorney circulated the letter, after which Deputy Assistant Attorney General (DAAG) Robert Moossy inquired on the status of a Task Force meeting for pro-life clinics.[20] The Task Force Director, CRT Trial Attorney Sanjay Patel, responded that he was waiting for the FBI to set up a call with the U.S. Conference of Catholic Bishops to put CRT in touch with pro-life facilities.[21] DAAG Moossy did a "quick google [*sic*] search," identified Care Net as a potential lead, and asked if an intern could do some further searches.[22]

Patel sent an outreach request through Care Net's general information email address, and after briefly connecting, asked Care Net to identify other similar pro-life organizations. Care Net identified three other organizations—Heartbeat International, National Institute of Family and Life Advocates (NIFLA), and Birthright. Care Net did not have contact information at Birthright,[23] and

---

[17] *Id.*

[18] 18 U.S.C. § 248(c)(2)(A)-(B).

[19] Letter from Jordan Sekulow, Am. Ctr. for L. & Justice, to Attorney General Merrick Garland (Aug. 8, 2022) (Exhibit 001).

[20] E-mail from Sanjay Patel, to Criminal Chief Jim Felte (Aug. 17, 2022) (Exhibit 002).

[21] *Id.*

[22] *Id.*

[23] E-mail from Vincent DiCaro, Chief Outreach Officer, Care Net, to Patel (Sept. 9, 2022) (Exhibit 003).

from that point on, DOJ only interacted with Care Net, Heartbeat International, NIFLA, and the U.S. Conference of Catholic Bishops.

Patel set up a Task Force meeting with representatives from those pro-life groups and invited Assistant Attorney General (AAG) Clarke,[24] despite her prior public statements regarding the "fake" clinics these organizations supported.[25] CRT's attorneys recommended that AAG Clarke omit the phrase "life affirming care" from her talking points.[26] AAG Clarke and Patel ultimately met with Care Net, Heartbeat International, and NIFLA.[27] Patel handled the meeting with the U.S. Conference of Catholic Bishops, as his supervisors decided AAG Clarke did not need to attend a meeting with such a small number of outside participants.[28]

The Biden DOJ handled the outside groups' requests differently. One of CRT's representatives on a different initiative, the Reproductive Rights Task Force, Robert Weiner, advised against providing a copy of DOJ's FACE Resource Booklet to pregnancy resource centers because:

> the vast majority of FACE Act violations have involved anti-abortion efforts . . . the booklet naturally focuses more on those activities. There are thus a number of aspects of the booklet that may militate against pushing it out during a meeting with Pregnancy Counseling Centers. . . . [T] the booklet refers to "clinics" throughout. Are "Pregnancy Counseling Centers" typically and appropriately described as "clinics"? Mostly, the booklet refers to "reproductive healthcare" and "reproductive healthcare providers," which arguably can include the anti-abortion centers, though **some might dispute whether they dispense health care.**[29]

The Task Force nevertheless opted to share these resources with pregnancy resource centers. After reviewing the Resource Booklet, Care Net raised concerns that the Department's treatment of reproductive health centers seemed one-sided.[30] Weiner reacted internally: "To some extent, it is entirely justified to refer to anti-abortion extremism, as that is a significant part of what the FACE Act and the Booklet covers. But it is also true that the list of references . . . includes

---

[24] Meeting Invitation from Patel (Oct. 7, 2022) (Exhibit 004); AAG Talkers for Clinic Violence TF Meeting with Pro-Life NGOs (Oct. 7, 2022) (Exhibit 005). *See also* Talking Points (Sept. 14, 2022) (Exhibit 006).

[25] *See, e.g.*, Kristen Clarke (@KristenClarkeJD), X (June 26, 2018, 1:14 PM), https://perma.cc/JB2D-XLCR (last visited Jan. 7, 2026) ("Make no mistake, today's decision at the #SCOTUS striking down a CA disclosure requirement for crisis pregnancy centers is part of a coordinated strategy to tear down #RoevWade. The anti-choice movement will stop at nothing. #EndTheLies #ExposeFakeClinics").

[26] AAG Talkers for Clinic Violence TF Meeting with Pro-Life NGOs (Oct. 7, 2022) (Exhibit 005).

[27] *See* E-mail from Patel, to Aryele Bradford (June 22, 2023) (Exhibit 007) (identifying the four pro-life groups with whom CRT met). *But see* Invite for Meeting with Reproductive Justice Groups (Sept. 26, 2022) (Exhibit 008) (meeting with numerous pro-abortion groups).

[28] *See* E-mail from DAAG Robert Moossy, to Criminal Chief Felte (Oct. 7, 2022) (Exhibit 009).

[29] E-mail from Robert Weiner, to Rebecca Bond (Aug. 17, 2022) (Exhibit 010) (emphasis added).

[30] E-mail from Weiner, to DAAG Moossy (Oct. 7, 2022) (Exhibit 011) (attaching an annotated copy of the Resource Booklet (Exhibit 012)).

NGOs Planned Parenthood, National Abortion Federation, and Feminist Majority Foundation—only."[31]

The Biden DOJ ultimately pursued three FACE Act prosecutions involving pro-life victims and informed these pro-life groups. Because AAG Clarke and CRT attorneys were unfamiliar with these groups, they struggled to identify how to describe the victims: AAG Clarke was unsure "whether the anti-abortion folks called themselves Pregnancy Centers or Pregnancy Resource Centers."[32] Weiner questioned whether to refer to these clinics as "pregnancy resource centers" or health services facilities that "[p]rovide [a]bortion [a]lternatives."[33] Once the press releases were published, AAG Clarke forwarded them to the pro-life groups, asserting that DOJ would continue to enforce the FACE Act to "protect the rights of *all* patients and *all* providers, including pregnancy resource centers."[34] But, as described below, these cases were not treated equally.

In 2024, a representative at Care Net also questioned the disparity in sentences for pro-life protestors compared to pro-choice protestors.[35] He thought there appeared "to be a double standard in these cases and not equal treatment under the law," and asked for more information about the sentences in FACE Act matters.[36] Patel responded that he would be happy to schedule a meeting to discuss and noted that there were "distinguishing factors" in the cases.[37] The pro-life group was skeptical and requested to "see a listing of charges/convictions sorted by those charged related to pro-life facilities and those related to abortion facilities."[38] Patel responded that he could only provide general information at the meeting, and that the information requested would "have to be routed through the Department's Freedom of Information Act Unit."[39]

---

[31] *Id.*

[32] E-mail from Weiner, to Bradford (Jan. 18, 2023) (Exhibit 013).

[33] *See* E-mail from Weiner, to AAG Clarke (Jan 17, 2023) (Exhibit 014).

[34] *See, e.g.*, E-mail from AAG Clarke, to Dan Balserak, U.S. Conf. of Cath. Bishops (Jan. 25, 2023) (Exhibit 015); E-mail from AAG Clarke, to Balserak (Sept. 13, 2024) (Exhibit 016); E-mail from AAG Clarke, to Jor-El Godsey, Heartbeat Int'l (Dec. 9, 2023) (Exhibit 017); E-mail from AAG Clarke, to Balserak (Dec. 9, 2023) (Exhibit 018); E-mail from AAG Clarke, to Tom Glessner, NIFLA (Dec. 9, 2023) (Exhibit 019); E-mail from AAG Clarke, to Roland Warren, Care Net (Dec. 13, 2023) (Exhibit 020); E-mail from AAG Clarke, to Balserak (Dec. 20, 2024) (Exhibit 021); E-mail from AAG Clarke, to Glessner (Dec. 20, 2024) (Exhibit 22); E-mail from AAG Clarke, to Godsey (Dec. 20, 2024) (Exhibit 023); E-mail from AAG Clarke, to Warren (Dec. 20, 2024) (Exhibit 024).

[35] E-mail from Patel, to President Warren, Care Net (Oct. 16, 2024) (Exhibit 025).

[36] *Id.*

[37] *Id.*

[38] *Id.*

[39] *Id.* For discussion of similar requests from pro-abortion NGOs, *see infra*, at 16–17, and from pro-life criminal defendants, *see infra*, at 20–21.

B. Interactions with Pro-Abortion Groups

In comparison, the Biden DOJ remained in continual contact with pro-abortion groups regarding the FACE Act. Both political leadership and career attorneys drove this relationship. Information flowed two ways. The outside groups provided information, often at DOJ's request. The Biden DOJ committed to pursuing FACE Act cases to support these group's interests. The outside groups provided information, often at DOJ's request. DOJ prosecutors shared information with these groups that they withheld from pro-life groups. And the Biden DOJ provided connections and contacts. Patel even agreed to serve as a reference for NAF on a grant application.

i. The Biden DOJ Was Committed to Protecting Abortion Access under the FACE Act.

After the Texas Heartbeat Law went into effect, then-Attorney General Merrick Garland proposed issuing a statement or letter "reminding everyone and reassuring clinics that the FACE Act is there."[40] AAG Clarke and her staff reached out to abortion providers and pro-abortion advocacy groups.[41] AAG Clarke also emailed the president of Planned Parenthood about "FACE Act Compliance," flagging that "we are on high alert when it comes to ensuring freedom of access to clinics; we are committed to using the FACE Act to hold accountable those who may seek to obstruct access to clinics."[42]

Likewise, after the Supreme Court overruled *Roe v. Wade*,[43] CRT's Criminal Chief Jim Felte forwarded an announcement from Attorney General Garland to both Task Force members and contacts at NAF, Planned Parenthood, and FMF.[44] In the message, Attorney General Garland reminded that, under his leadership, "[t]he Justice Department will work tirelessly to protect and advance reproductive freedom."[45] A month after the *Dobbs* decision, Attorney General Garland, Deputy Attorney General Lisa Monaco, and Associate Attorney General Vanita Gupta met with numerous pro-abortion groups about DOJ's response to the decision.[46] The outside groups included NARAL Pro-Choice of America, Planned Parenthood, the Center for Reproductive Rights, and about 10 other NGOs.[47] Speakers from the NGOs "uniformly expressed gratitude for

---

[40] E-mail from Principal Deputy Assistant Attorney General (PDAAG) Pamela Karlan, to Criminal Chief Felte and Principal Deputy Chief Fitzgerald (Sept. 2, 2021) (Exhibit 026).

[41] Calendar Hold for AAG Clarke (Sept. 2, 2021) (Exhibit 027).

[42] E-mail from AAG Clarke, to Alexis McGill Johnson, Planned Parenthood (Sept. 2, 2021) (Exhibit 028).

[43] *Dobbs*, 597 U.S. at 215. Shortly after the May 2, 2022 *Dobbs* leak, the FACE Task Force agreed to meet "to discuss potential fallout before [hosting] any larger meeting with providers, which [they] suspect[ed] would be loaded with questions." E-mail from Patel, to [Redacted] (FBI) (May 4, 2022) (Exhibit 029); E-mail from Patel, to Laura Cowall (May 4, 2022) (Exhibit 030).

[44] E-mail from Criminal Section Chief Jim Felte, to Patel (June 24, 2022) (Exhibit 031).

[45] *Id.*

[46] E-mail from Weiner, to Bond (July 25, 2022) (Exhibit 032). *See also* E-mail from ASG19 Schedule, to Saeed Mody (Sept. 26, 2022) (Exhibit 008) (circulating a meeting invitation to numerous "reproductive justice groups")

[47] *Id.*

DOJ's strong commitment to reproductive rights, to the point that [the moderator] asked them to dispense with the thanks because it was taking up too much time."[48]

AAG Clarke continued this outreach, including meeting with NAF. In the meeting request, NAF praised the "amazing relationship with [] NAF Security Director Michelle Davidson and members of the DOJ Civil Right Division," and highlighted its involvement in "several FACE Act investigations, working with AUSAs and FBI in TN, FL, VA, CA, NY, MD and NC[.]"[49]

ii. The Biden DOJ Sought and Relied on Information from Abortion NGOs, Including Ongoing Monitoring of Pro-Life Americans.

NAF's characterization of its relationship with the Biden DOJ was accurate. The Biden DOJ closely coordinated with abortion providers and NGOs, particularly NAF, to identify potential pro-life targets for investigation and build cases against them. Coordination primarily took place between Patel, as Task Force Director, and NAF Security Director, Michelle Davidson, who remained in routine communication. Patel described Davidson as an "MVP" at bringing incidents to his "attention, often in real-time, which usually result in an investigation/ prosecution."[50] He viewed NAF as a "great resource for any investigation we have that involves clinic violence," and a "wonderful contact for [him] as it relates to FACE Act investigations."[51] Patel's supervisor, Principal Deputy Chief Paige Fitzgerald, described the relationship as follows:

> National Abortion Federation [is] one of the three main reproductive health care provider (RHCP) groups in the country (the others are Planned Parenthood and Feminist Majority). We have worked with NAF for decades. NAF regularly refers potential FACE Act violations and other threats to RHCPs, helps us liaise with clinics and staff, lets us know about upcoming events that might result in security concerns so we can notify FBI and USMS, etc. Because they are NGOs, they can poke around on the internet in ways we can't, and they have shared leads with us, etc.[52]

At Patel's request or encouragement, NAF provided the Biden DOJ with substantial information that aided in identifying investigation targets and substantiating warrants and

---

[48] *Id.*

[49] E-mail from AAG Clarke, to Robert Ledogar, NAF (Jan 10, 2023) (Exhibit 033); Invitation from Bridget Cheung-Smith, to AAG Clarke and Ledogar (Jan 17, 2023) (Exhibit 034); E-mail from Weiner, to Ledogar, NAF (Jan. 17, 2024) (Exhibit 035); E-mail from Weiner, to Principal Deputy Chief Fitzgerald (Jan. 17, 2024) (Exhibit 036).

[50] *See* E-mail from Patel, to [Redacted], FBI (Nov. 17, 2021) (Exhibit 037).

[51] *Id.*; E-mail from Patel, to Davidson (July 16, 2021) (Exhibit 038) ("Michelle is an all-around superstar who has been a valuable resource for me in my role as the national FACE Act guy.").

[52] E-mail from Principal Deputy Chief Fitzgerald, to John Buchko (Oct. 31, 2023) (Exhibit 039).

prosecutions.[53] NAF alerted Patel to social media posts that made violent threats against clinics[54] and concerns about protest activities that could constitute blockades in violation of the FACE Act.[55] In the *Handy* matter, Patel emailed NAF: "I can't recall if you ever shared anything with me (either through an attachment or via Dropbox) about Jonathan Darnell's arrest . . . If you did, can you resend that to me?"[56]

NAF, Planned Parenthood, and FMF not only flagged concerns about possible violations of the FACE Act, but also monitored the activities and locations of pro-life activists and shared updates about their First Amendment activities with the Biden DOJ and FBI *in case* chargeable conduct occurred. The Biden DOJ later charged many of the individuals surveilled by abortion NGOs. The types of information provided to DOJ for law enforcement efforts included, for example:

- In advance of a national event by Operation Save America, NAF compiled a law enforcement resource guide on the group and its event.[57] The guide broke down the schedule of events—including protests and meetings at local churches—before providing detailed dossiers of "anti-choice individuals" expected to attend, including pro-life pastors and speakers. These dossiers included significant amounts of personal identifying information, such as birthdates, addresses, contact information, physical descriptions and photographs, names of family and close associates (including photographs of minor children), affiliated groups, history of pro-life and faith-based activities, and drivers' license numbers.[58] The guide included information about prior protests that ultimately were the basis for the Biden DOJ's FACE Act charges.[59]

- NAF forwarded DOJ "anti-choice social media posts" by Cal Zastrow.[60] The posts included statements such as: "This is what loving your doomed preborn neighbor looks like . . . Sacrificial love, as an act of worship to Jesus." "Greater love has no one than this, that someone lay down his life for his friends."[61]

---

[53] *See, e.g.*, E-mail from Patel, to Megan Healy (Nov. 16, 2020) (Exhibit 040) ("NAF is obtaining the security video from the vandalism for me.").

[54] E-mail from Patel, to Emma Goldberg (NAF) (Apr. 12, 2021) (Exhibit 041) (flagging that Patel forwarded the information to the FBI immediately and noting that he was "designated as the DOJ National FACE Act Task force director" and wanted to call about exploring outreach initiatives).

[55] E-mail from Fleisher, to Patel (Aug. 18, 2020) (Exhibit 042) (responding to a NAF alert about Handy's pro-life activities in Washington, D.C., a CRT attorney asked NAF to let him know "[i]f she actually ends up causing any obstruction," and noted that while he could not speak for the Criminal Section, "we on the civil side might be interested in looking further"); E-mail from Davidson, to [Redacted], FBI (Jan. 30, 2021) (Exhibit 043) (alerting DOJ to Handy's activities in Maryland).

[56] E-mail from Patel, to Davidson (Dec. 8, 2020) (Exhibit 044).

[57] *See* Operation Save America National Event Resource Guide (2021) (Exhibit 045).

[58] *Id.*

[59] *Id.*

[60] E-mail from Goldberg, to Patel (May 13, 2021) (Exhibit 046).

[61] *Id.*

- Davidson forwarded news articles about Handy from "Right Wing Watch" and her social media posts.[62] In response, Patel asked for names and case numbers of her associates who had local cases pending in D.C.[63] Davidson then compiled information for Patel about Handy, Fr. Christopher Moscinski, and William Goodman, along with others.[64] The email included local case numbers involving these individuals and "some articles on Moscinski that go pretty far back," such as an ACLU news article from 1997 and a law review article by Professor Michael W. McConnell.[65] Patel forwarded the case numbers to the U.S. Attorney's Office for the District of Columbia, flagging the information regarding "activists whom I've been monitoring over the past few years."[66]

- Davidson forwarded the FBI social media posts from Handy about pro-life protests and noted that NAF was planning to alert other facilities in the area.[67] The FBI flagged NAF's outreach to DOJ and the local USAO, noting that her activities "[a]ppear[] to all be 1st Amendment protected activity, so [we are] being mindful of that, but figured it made sense to pass along the email."[68]

- Davidson notified Patel that Cal Zastrow and other pro-life activists had traveled to Montana. Davidson said, "I would bet they might try to block a clinic this week so I'm reaching out to clinics and my few local PD contacts to see if I could bring some awareness."[69] A week later, Patel responded asking if NAF had "any info on Zastrow and Co's travel to Montana."[70]

- NAF obtained an audio recording of Handy speaking to pro-life activists and corresponding documents from the Progressive Anti-Abortion Uprising. NAF forwarded them to Patel and other DOJ attorneys.[71]

- Planned Parenthood provided DOJ and FBI with a Request for Information about a pro-life activist who belongs to a pro-life religious order, the Franciscan Brothers of Peace.[72] The Request for Information explained that the subject "is a devout Catholic" and that the penalties for his pro-life protests had so far been "limited to fines or community service."

---

[62] E-mail from Davidson, to Patel (Aug. 20, 2020) (Exhibit 047).

[63] E-mail from Patel, to Davidson (Aug. 20, 2020) (Exhibit 048).

[64] E-mail from Davidson, to Patel (Aug. 18, 2020) (Exhibit 049).

[65] *Id.*

[66] E-mail from Patel, to Joseph Cooney (Sept. 1, 2020) (Exhibit 050).

[67] E-mail from Davidson, to [Redacted], FBI (Dec. 29, 2020) (Exhibit 051).

[68] *Id.*

[69] E-mail from Davidson, to Patel (Sept. 9, 2021) (Exhibit 052) (notifying Patel that Cal Zastrow was in Montana, along with other pro-life activists).

[70] *Id.*

[71] E-mail from Eduardo Serrano, NAF, to Patel (Jan. 31, 2023) (Exhibit 053).

[72] Planned Parenthood, Request for Information re: [Redacted] (Aug. 27, 2021) (Exhibit 054).

- Planned Parenthood compiled a Security Advisory on "Red Rose Rescues," which it characterized as "trespass/blockade" "tactics used by the anti-abortion movement designed to avoid federal FACE Act violations."[73] The advisory flagged its assessment that this pro-life group was likely to recruit like-minded "opposition." Planned Parenthood assessed that "should this movement grow, it will have a direct impact on Planned Parenthood operations." The advisory highlighted Handy, Goodman, and Fr. Moscinski as some of the "core group of organizers and participants." The advisory concluded with a list of arrests at abortion clinics across the country, including many of the individuals whom the Biden DOJ later charged.[74]

- FMF sent a letter and memorandum "urging the DOJ to pursue criminal charges and nationwide injunctive relief to prevent ongoing and future violations" of the FACE Act.[75] Both documents cited the activities of Bevelyn Beatty Williams, Handy, Darnell, Fr. Moscinski, along with all of the *Gallagher* defendants, as supporting evidence for their request.[76] Principal Deputy Chief Fitzgerald thought the request for nationwide injunctions "seems like a good idea to me."[77] FMF called Patel, flagging that she was "getting ready to make some noise" about the letter, after which the Biden DOJ "tr[ied] to move things along on our end."[78] CRT then pursued a consent decree against a different pro-life activist that would have imposed a nationwide injunction. AAG Clarke approved the effort, but the consent order ultimately was never imposed.[79]

DOJ later charged many of these same individuals with FACE Act violations. In each of the six FACE Act cases that President Trump pardoned, DOJ had learned of the underlying acts from the three abortion NGOs.[80] Biden DOJ attorneys forwarded information from the abortion NGOs to the FBI (when the FBI was not already included in the communications), and the Task

---

[73] Planned Parenthood Global Safety and Security, Overview of Emerging Trend: "Red Rose Rescues" and blockade tactics (July 14, 2019) (Exhibit 055).

[74] *Id.*

[75] E-mail from duVergne Gaines, FMF, to Patel (Aug. 25, 2022) (Exhibit 056); Letter from FMF, to AG Garland (Aug. 25, 2022) (Exhibit 057); Memorandum from FMF (Exhibit 058).

[76] Memorandum from FMF at 20 (Exhibit 058).

[77] E-mail from Principal Deputy Chief Fitzgerald, to DAAG Moossy (Sept. 8, 2022) (Exhibit 059).

[78] E-mail from Laura Cowall, to Patel (Feb. 27, 2023) (Exhibit 060).

[79] *See* Request for Settlement Authority under the FACE Act, 18 U.S.C. § 248 (Feb. 14, 2024) (Exhibit 061) (requesting authorization from AAG Clarke for a consent decree to resolve FACE Act claims to "ensure both [defendants] maintain distance from clinics nationwide and are prohibited from violating FACE in the future").

[80] E-mail from NAF Security Department, to Patel (Oct. 22, 2020) (Exhibit 062) (alert about *Handy*); E-mail from Davidson, to Patel (Mar. 5, 2021) (Exhibit 063) (alert about *Gallagher*); E-mail from Davidson, to Fleisher (Aug. 27, 2020) (Exhibit 064) (alert about *Zastrow* Sterling Heights protest); E-mail from Patel, to Carlson (Apr. 16, 2021) (Exhibit 065) (forwarding NAF's alert about *Zastrow* Saginaw protest); E-mail from Patel, to [Redacted] (Oct. 18, 2021) (Exhibit 066) (forwarding an e-mail from Planned Parenthood alerting him to *Houck*-related activities); E-mail from Patel, to David Kennedy (July 14, 2022) (Exhibit 067) (forwarding alert about *Moscinski*).

Force relied on information from NAF to identify demonstrators[81] and compile evidence that DOJ used to investigate and charge pro-life demonstrators.[82]

Abortion NGOs sent DOJ more information about one pro-life activist than all the rest: Bevelyn Beatty Williams. Based in large part on this outreach, the Biden DOJ and FBI monitored Beatty's activities across jurisdictions and several considered whether her conduct was chargeable under the FACE Act. The USAO in the Southern District of New York ultimately charged her with a felony violation. After Beatty was sentenced, Patel updated his contacts at NAF, FMF, and Planned Parenthood, who were "[g]rateful for the update and hard work behind the case."[83] The NGOs' ongoing requests to the Biden DOJ about Beatty included:

- On January 8, 2021, Davidson flagged for Patel and the FBI that NAF was "gathering and compiling a lot of video and intel from Wednesday's events at the Capitol," along with the Abortion Access Front.[84] Davidson explained that with the upcoming March for Life, NAF was "very concerned that the individuals that participated in the invasion at the Capitol will continue similar actions at this event," and they wanted to provide as much information as possible in light of "growing concerns that these types of extremists now pose an even greater threat to Homeland Security than [Foreign Terrorist Organizations]." Several days later, NAF followed up with a dossier listing "the names of our well known antis" as "[p]eople of interest," including Beatty.[85] Patel looked for the correct contacts at the FBI with whom to share the information from NAF.[86] An hour later, Principal Deputy Chief Fitzgerald signed off on one of Patel's proposed FACE Act grand jury memoranda, reacting that "[t]his is a great case to be bringing now . . . we should make sure that the extremists know that we still have this tool and will use it."[87]

- On January 28, 2022, an intelligence analyst for Planned Parenthood contacted her local sheriff's office about a demonstration in Florida, to which she appended several advisories compiling information about the views, activities, and known whereabouts of several Christian pro-life activists, including Beatty, Cal Zastrow, Eva Zastrow, and Chet Gallagher.[88] In her email, she emphasized: "*What can we do to push FACE Act charges*

---

[81] *See, e.g.*, E-mail from Patel, to Aloi (Aug. 9, 2022) (Exhibit 068) (flagging that NAF was trying to identify individuals involved in demonstrations in Grand Rapids, Michigan); Email from Davidson, to [Redacted], FBI (Jan. 4, 2021) (Exhibit 069) (identifying pro-life activists involved in the DC matter at the FBI's request). *See also* E-mail from Davidson, to [Redacted], FBI (Oct. 18, 2022) (Exhibit 070).

[82] *See, e.g.*, E-mail from Patel, to James McNally (Sept. 14, 2020) (Exhibit 071); E-mail from Patel, to Healy (Nov. 16, 2020) (Exhibit 041).

[83] E-mail from Gaines, to Patel (July 24, 2024) (Exhibit 072).

[84] E-mail from Davidson, to Patel (Jan. 8, 2021) (Exhibit 073).

[85] E-mail from Gannon, to [Redacted], FBI (Jan. 12, 2021) (Exhibit 074) (emphasis added) (enclosing attachment "Anti_Abortion_Insurrectionists_at_US_Capitol_Overview.docx" (Exhibit 075)).

[86] E-mail from Patel, to Principal Deputy Chief Fitzgerald (Jan. 8, 2021) (Exhibit 076).

[87] E-mail from Principal Deputy Chief Fitzgerald, to Patel (Jan. 8, 2021) (Exhibit 077).

[88] E-mail from Alicia Davis, Planned Parenthood, to Sheriffs (Jan. 28, 2022) (Exhibit 078). The email enclosed advisories from March 22, 2021 (Exhibit 079); January 7, 2022 (Exhibit 080); and January 27, 2022 (Exhibit 081).

again for those involved…?"[89] Those materials were shared with the FBI, who in turn sent them to Patel.[90] Planned Parenthood's January 27, 2022 advisory noted that Beatty and Edmee Chavannes were not arrested and did not blockade.[91] Nonetheless, it appended a photo of them, along with other pro-life activists, and labeled Beatty and Chavannes as their "opposition identified."[92]

- On July 7, 2022, NAF notified the FBI and Patel about Beatty's recent activities,[93] attaching a dossier containing Beatty's photograph, contact information and address, information about her husband and infant child, her affiliated ministries, and a list of her arrests.[94]

- A week later, a representative for the Georgia clinic emailed Patel at the Clinic Violence email account, copying the FBI and a long list of abortion NGOs and providers, to ask for help to "stop these [ ] habitually criminal extremists from coming onto our properties," inquiring whether Beatty was on a domestic terror watchlist.[95] Patel addressed the concerns over a telephone call and stayed in touch with the clinic contact, who thanked Patel in real time for obtaining convictions in the *Handy* matter.[96]

iii. DOJ Provided NAF Internal Department Information and Coordinated with NAF on Pro-Abortion Outreach and Civil FACE Act Litigation.

Patel provided significant amounts of information to NAF, seemingly unbeknownst to CRT supervisors who thought that the "information flow ha[d] always been a one-way street."[97]

- When NAF requested a list of all active FACE charges, "including [crisis pregnancy centers] and churches," Patel sent a complete list back within the hour.[98]

- When NAF and FMF requested information about the "Terms of Release for several OSA extremists (Gallagher, Cal, James, and Eva Zastrow, Edl, and Place) as well as the DC ([Progressive Anti-Abortion Uprising]) crew Terms of Release," Patel and AUSAs shared

[89] E-mail from Alicia Davis, Planned Parenthood, to Sheriffs (Jan. 28, 2022) (Exhibit 078) (emphasis in original).

[90] *Id.*

[91] Planned Parenthood Advisory from January 27, 2022, *supra* note 88 (Exhibit 081).

[92] *Id.*

[93] E-mail from Davidson, to Patel (July 7, 2022) (Exhibit 082).

[94] NAF Dossier on Beatty (Exhibit 083).

[95] E-mail from [Redacted], to Patel (July 14, 2022) (Exhibit 084).

[96] *Compare* E-mail from [Redacted], to Patel (Aug. 29, 2023 3:38PM) (Exhibit 085), with E-mail from Criminal Chief Felte, to Weiner (Aug. 29, 2023 3:28PM) (Exhibit 086).

[97] E-mail from Principal Deputy Chief Fitzgerald, to Buchko (Oct. 31, 2023) (Exhibit 039).

[98] E-mail from Patel, to Davidson (May 15, 2023) (Exhibit 087).

it quickly.[99] Two days later, NAF shared those terms for the Gallagher defendants with its membership Security Update email list.[100] After sharing this information, NAF flagged protests by defendants as possible violations of their sentencing terms.[101]

- At NAF's invitation, Patel attended its national conference and presented an update to abortion clinics and providers about the FACE Act. In his read-out of the NAF Conference, he noted that his presentation on FACE Act was "well received." "The big takeaway – many providers are scared with the Dobbs anniversary fast approaching; and they are frustrated that we are using FACE to protect 'fake clinics.' There were many other providers who fired back during some cross-audience debating, recognizing that if we don't enforce the statute even-handedly, we'll likely lose it."[102]

- NAF asked Patel whether the defendants in *Zastrow* would plead and for information about why the case schedule was shifted. Patel responded, "I'm pretty sure the continuance was to accommodate the attorneys' schedules, and to provide sufficient time before trial . . . The part regarding pleas might be standard language . . . I'll check with the prosecutors about that."[103]

The Task Force also coordinated with NAF when preparing for meetings with outside advocacy groups.[104] For example, before a meeting with numerous pro-abortion groups, Patel consulted with NAF about questions from clinics that he could raise with his supervisor, including ideas about how to possibly extend the scope of the FACE Act's protections to "constructive phys[ical] obstruction."[105] NAF specifically flagged that meeting guests would want to talk about pro-life activist Bevelyn Beatty and recent case updates in state court.[106]

Additionally, the Task Force coordinated with NAF on civil, private-party litigation against many of the pardoned defendants, which ultimately resulted in the United States filing a statement of interest on behalf of the clinic. In February 2022, Patel, NAF, and FMF discussed the local

---

[99] E-mail from Patel, to Davidson (Oct. 31, 2022) (Exhibit 088); E-mail from Klopf, to Gaines (Oct. 11, 2022) (Exhibit 089) (sharing the terms of pre-trial release with NAF and FMF).

[100] Email from NAF Security Department, to Fitzgerald (Oct. 13, 2022) (Exhibit 090).

[101] E-mail from Patel, to Laura-Kate Bernstein (Aug. 29, 2024) (Exhibit 091) (forwarding questions from NAF about whether Eva and Cal Zastrow were violating their house arrest by "protesting outside a NAF member facility in Flint, MI"); E-mail from Serrano, to Patel (May 11, 2023) (Exhibit 092) (forwarding a social media post from Lauren Handy about a training on pro-life activity in case it was a violation of her terms of release).

[102] *See* E-mail from Patel, to DAAG Moossy (May 12, 2023) (Exhibit 093).

[103] E-mail from Patel, to Davidson (Apr. 19, 2023) (Exhibit 094).

[104] *See* E-mail from Davidson, to Patel (Nov. 29, 2021) (Exhibit 095); E-mail from Davidson, to Patel (Nov. 9, 2021) (Exhibit 096); E-mail from Patel, to Principal Deputy Chief Fitzgerald (Nov. 26, 2021) (Exhibit 097) (attaching meeting agenda for Task Force meeting with abortion NGOs and clinics (Exhibit 98)).

[105] E-mail from Davidson, to Patel (Nov. 29, 2021) (Exhibit 095).

[106] *Id.*

proceedings stemming out of the Mt. Juliet demonstration,[107] and Davidson reached out to Patel separately to request time on his calendar to discuss FACE Act strategies and get an "update on the TN briefing."[108] DOJ ultimately took a two-pronged approach, bringing criminal FACE Act charges and supporting Carafem in its civil FACE Act suit when many of the same pro-life individuals returned to protest there the following year.

On July 29, 2022, Carafem filed a complaint against Beatty, Chavannes, Gallagher, Operation Save America National Inc., and Operation Save America's President Jason Storms, among others. Carafem alleged that defendants violated the FACE Act on July 26, 2022, when Coleman Boyd protested at Carafem with approximately 150 members of Operation Save America.[109] Carafem obtained a temporary restraining order and a preliminary injunction preventing any of the defendants from entering the property where Carafem is located during its business hours or otherwise obstructing those seeking reproductive health service from the facility.[110]

Through NAF, the ACLU and Carafem informed Patel first that they were considering filing the motion for a temporary restraining order,[111] discussed possible coordination,[112] and then notified him of the filing.[113] In a related exchange, a CRT attorney explained that "[c]ivil FACE doesn't give us any remedies that they cannot get, so I'm not sure filing our own suit makes sense," but flagged that "I would love to file a[] [statement of interest] to show our support."[114]

On September 1, 2022, DOJ filed a Statement of Interest, asserting its "interest in enforcing federal laws that protect access to reproductive health services, including, but not limited to, abortion care," and seeking "to make clear that the FACE Act prohibits temporary physical obstructions or incomplete blockages of clinic access to reproductive health facilities."[115]

---

[107] *See* E-mail from Patel, to Gaines (Feb. 3, 2022) (Exhibit 099); *Id.*, E-mail from Gaines, to Patel (Feb. 3, 2022) (attaching Exhibit 100). *See also* E-mail from Patel, to Klopf (May 10, 2022) (Exhibit 101) (discussing update from Tennessee law enforcement about the resolution of the local proceedings).

[108] E-mail from Davidson, to Patel (Feb. 9, 2022) (Exhibit 102).

[109] Memorandum Order, *Femhealth USA, Inc. v. Williams*, No. 3:22-cv-00565 (M.D. Tenn. Sept. 14, 2022), dkt. no. 65.

[110] *Id*. at 2-3, 12; Temporary Restraining Order, *Femhealth USA, Inc. v. Williams*, No. 3:22-cv-00565 (M.D. Tenn. July 29, 2022), dkt. no. 9;

[111] *See* E-mail from Davidson, to Patel (July 29, 2022) (Exhibit 103).

[112] *See* E-mail from Brigette Amiri, ACLU, to Patel (July 29, 2022) (Exhibit 104).

[113] E-mail from Ryan Mendias, ACLU, to Patel (July 29, 2022) (Exhibit 104).

[114] E-mail from Kerry Dean, to Patel (Aug. 1, 2022) (Exhibit 104).

[115] Statement of Interest of the United States, *Femhealth USA, Inc. v. Williams*, No. 3:22-cv-00565 (M.D. Tenn. Sept. 1, 2022).

iv. The Biden DOJ Helped Abortion NGOs Obtain Third-Party Grants.

When abortion NGOs raised concerns about possible violations or requests for contacts with the FBI, the Task Force Director immediately helped and connected NAF with contacts around the country.[116] In late 2020, NAF asked if Principal Deputy Chief Fitzgerald would serve as a reference on "a fund proposal (that supports, among other things, their training and threat monitoring services)."[117] Patel forwarded the request to her, suggesting that NAF "may be able to list me in your place," and then followed up stating that absent objection, he would have "NAF use [him] as the reference for their grant application."[118] Before his supervisor responded, Patel agreed to serve as NAF's reference.[119] When his supervisor eventually responded, she recommended that Patel "ask our ethics person[] what we are allowed to do/say re: an NGO with whom we interact."[120] DOJ's review of all custodian emails did not reveal any email where Patel contacted his ethics officer on this matter or retracted his offer to NAF.

Two years later, NAF requested that Task Force Director Patel help them with another grant application, asking that he "write a short impact statement, on DOJ letterhead, and in your own words, on the importance of the NAF Security Departments work and the impact on provider safety in the DMV. You could also talk about how we work together and some of the outcomes of our efforts if you feel inclined."[121] Patel flagged that he would have to get permission from Principal Deputy Chief Fitzgerald "to write a statement for you (which you know I am otherwise happy to do for you)."[122] There was no further correspondence on this topic in DOJ records.

---

[116] E-mail from Patel, to Davidson (July 16, 2021) (Exhibit 038) (responding to a request from Davidson for an FBI contact in West Virginia); E-mail from Patel, to [Redacted], FBI (Nov. 17, 2021) (Exhibit 037) (connecting NAF with a California-based FBI contact).

[117] E-mail from Patel, to Principal Deputy Chief Fitzgerald (Dec. 23, 2020) (Exhibit 105)

[118] *Id.*

[119] E-mail from Patel, to Tara Gannon (Dec. 23, 2020) (Exhibit 106) (agreeing to serve as a reference).

According to its website, the "the Lisa and Douglas Goldman Fund is a private foundation committed to providing support for charitable organizations that enhance our society." *See ABOUT US*, LGDFUND.ORG (last visited Feb. 17, 2026), https://perma.cc/25C8-VXN6. NAF ultimately received $90,000 in grant funding from the Lisa and Douglas Goldman Fund in 2021 and $100,000 in grant funding in 2022. *Grants Database*, LGDFund.org (last visited Feb. 17, 2026), https://perma.cc/5LA9-FVLS. Davidson later informed Patel that this foundation was one of "the main funder[s] of [NAF's] security work." E-mail from Davidson, to Patel (Nov. 9, 2021) (Exhibit 096).

[120] E-mail from Principal Deputy Chief Fitzgerald, to Patel (Dec. 30, 2020) (Exhibit 105).

[121] E- mail from Principal Deputy Chief Fitzgerald, to John Buchko (Nov. 1, 2023) (Exhibit 039); E-mail from Davidson, to Patel (Oct. 31, 2023) (Exhibit 107).

[122] E-mail from Patel, to Davidson (Oct. 25, 2023) (Exhibit 107).

IV. THE BIDEN DOJ'S INAPPROPRIATE PROSECUTORIAL CONDUCT

DOJ prosecutors engaged in inappropriate conduct and comments directed toward pro-life defendants. Prosecutors disparaged defendants' religious beliefs, Catholic judges, and defense counsel. Prosecutors sought to exclude religious jurors. They declined to allow some defendants to self-surrender, instead authorizing aggressive arrest tactics. And, when defense counsel requested data on historic FACE Act prosecutions, Patel asserted that he did not maintain those records, referring counsel to the FOIA process, although he had the data on hand and had provided similar information to abortion NGOs a year prior. The following three examples provide case studies of these inappropriate prosecutorial decisions and conduct.

A. *United States v. Gallagher*: The Biden DOJ Claimed to Defense Counsel That It Did Not Keep Information Requested for a Selective Prosecution Defense, Despite Giving Materially Identical Information to NAF.

On March 5, 2021, Gallagher, Heather Idoni, Calvin Zastrow, Davis, Paul Vaughn, Eva Edl (an approximately 87-year-old Soviet death camp survivor), Eva Zastrow, James Zastrow, and Paul Place gathered in the hallway outside Carafem Health Center, in Mt. Juliet, Tennessee. They met at approximately 7:45 a.m., before the facility opened. Dennis Green and Boyd subsequently joined them.[123] NAF alerted Patel that there was an "active blockade at Carafem in Mt. Juliet, TN" while it was still ongoing, and that NAF would monitor and download the demonstrator's live stream.[124]

The Task Force reengaged on the matter shortly after the *Dobbs* leak.[125] On October 3, 2022, DOJ secured a two-count indictment. It charged Gallagher, Idoni, Calvin Zastrow, Boyd, Davis, Vaughn, and Green with violating 18 U.S.C. § 241 (conspiracy against rights). And it charged each defendant with violating the FACE Act.[126]

In January 2023, one of the defense counsel contacted the AUSA requesting information about "how many FACE Act criminal prosecutions there have been in the last ten years, including both reproductive right clinics, churches etc."[127] The counsel flagged that "[i]t is no secret that we will make a selective prosecution type argument," and anticipated that this information would be necessary to help the judge assess the defense.[128]

The Biden DOJ prosecutors had this information readily available, having compiled it before defense counsel's request. They refused to share it. A month later, after several more requests as defendants' filing deadline was approaching, Patel responded, stating:

---

[123] Indictment, *United States v. Gallager,* No. 3:22-cr-00327 (M.D. Tenn. Oct. 3, 2022).

[124] E-mail from Davidson, to Patel (Mar. 5, 2021) (Exhibit 063).

[125] Patel e-mailed the USAO to "get the [grand jury] memo moving [on this case] so that we can figure out what our likely target indictment date is." E-mail from Patel, to Klopf (May 8, 2022) (Exhibit 101).

[126] Indictment, *United States v. Gallager*, No. 3:22-cr-00327 (M.D. Tenn. Oct. 3, 2022).

[127] E-mail from Jodie Bell, to Klopf (Jan. 27, 2023) (Exhibit 108).

[128] *Id.*

> As the national clinic violence coordinator, I do not keep the kind of records you requested and, as a result, I do not believe that we will provide them to you. However, I expect that much of what you seek is publicly available. For example, there are press releases on the DOJ's public website that address FACE Act prosecutions. With those press releases, you would be able to obtain additional materials through the courts' online databases. [129]

Patel's representation to defense counsel was false. [130] At Patel's request, in October 2022, CRT compiled a spreadsheet of all DOJ actions under the FACE Act. [131] The FBI provided him monthly updates about the number of FACE Act investigations and prosecutions, broken down by pro-life and pro-choice valence. [132] Additionally, he had previously compiled and shared a full list of FACE Act prosecutions to NAF when that team requested similar data. [133]

The First Assistant United States Attorney was inclined to provide the data, but Patel decided "we should not provide her with anything," reasoning that "[p]roviding her with the requested information may open gates we will struggle to close later." [134]

[129] E-mail from Patel, to Bell (Feb. 22, 2023) (Exhibit 108).

[130] Under the Rules of Professional Conduct, attorneys are obligated to truthfulness: "In the course of representing a client, a lawyer shall not knowingly [] make a false statement of material fact or law to a third person." Am. Bar Ass'n, Model Rules of Professional Conduct 4.1(a) (2019). The Justice Manual mandates that DOJ employees "must comply with the rules on Government ethics" and "applicable rules of professional conduct." U.S. Dep't of Just., Just. Manual § 1-4.010, https://perma.cc/L3GU-6SPS.

[131] E-mail from Miller, to Patel (Oct. 19, 2022) (Exhibit 109).

[132] E-mail from [Redacted], FBI, to Patel (May 31, 2024) (Exhibit 110); E-mail from Patel, to Criminal Chief Felte (May 28, 2024) (attached as Exhibit 111) (summarizing the FACE Act charges brought since January 2021).

[133] *See supra*, at 16 & n.98.

[134] E-mail from Patel, to Klopf (Feb. 2, 2023) (Exhibit 112).

B. *United States v. Zastrow*: The Biden DOJ Allowed Abortion NGOs to Drive Charging Decisions and Engaged in Blatant Anti-Christian Bias in the Jury Pool.

On August 27, 2020, Calvin Zastrow, Gallagher, Idoni, Davis, Joel Curry, Justin Phillips, Edl, and Eva Zastrow demonstrated at a women's clinic in Sterling Heights, Michigan. Before the demonstration, the Defendants and other demonstrators gathered near the clinic and prayed. The Defendants then walked to the clinic's entrance area while others demonstrated from the public sidewalk, carrying signs, singing hymns, and praying. Several defendants spoke to women at the clinic, and several stood or sat in front of the doors while praying or singing hymns. Law enforcement officers responded and asked the Defendants to move. When the Defendants refused to move, they were arrested and charged with a 30-day misdemeanor trespass offense by the local prosecutor.

On August 27, 2020, while the demonstration was still underway, Davidson notified Patel that there was an active "blockade" occurring and that Gallagher was among the demonstrators "sitting in front of the doors."[135] Davidson's colleague forwarded Patel videos of the demonstration the next day, which Patel immediately sent to his deputy chief in CRT, noting that he would be "happy to jump on this if you'd like."[136]

On September 1, 2020, Patel contacted Frances Carlson, an AUSA from the United States Attorney's Office for the Eastern District of Michigan and forwarded her an e-mail chain that he received from NAF, containing an earlier e-mail from the clinic's owner to the FBI describing the demonstrators as "terrorists;" explaining that the demonstration was "distressing, illegal[,] and [the clinic was] not happy with the way it was handled[;]" and noting that they "want[ed] to move forward with a FACE prosecution and are sending all this information over to the Department of Justice."[137] Patel told Carlson that he thought there was a good misdemeanor FACE Act charge for each demonstrator who blocked the entrance.[138] He reached out to Davidson to ask her to "help coordinate" getting him copies of witnesses statements, video footage, and photographs the clinic gathered.[139]

In December 2020, the United States Attorney's Office declined to bring federal misdemeanor charges because the prosecution was being handled via local arrests.

On April 16, 2021, Idoni and Edl sat in front of an abortion clinic doors in Saginaw, Michigan. Idoni wanted to stay there as long as possible "to prevent babies from dying." Edl wedged a door stop under the door, and Idoni chained herself to a second door using a bike lock.

---

[135] E-mail from Davidson, to Fleisher (Aug. 27, 2020) (Exhibit 064).

[136] E-mail from Patel, to CRT Deputy Chief Bobbi Bernstein (Aug. 28, 2020) (Exhibit 113).

[137] E-mail from Patel, to Carlson (Sept. 1, 2020) (Exhibit 114).

[138] *Id*.

[139] E-mail from Patel, to Davidson (Sept. 1, 2020) (Exhibit 115). On September 14, 2020, Davidson, who received a copy of the police report from the August 27, 2020, arrest, forwarded it to Patel, noting that he should please "let [NAF] know if [they] can assist with anything else." E-mail from Fleisher, to Patel (Sept. 14, 2020) (Exhibit 116).

The police arrested Edl and Idoni for misdemeanor trespassing after they refused to leave. A local prosecutor charged Idoni and Edl with misdemeanor trespassing, a state jury found them both guilty, and the state court fined each $225.

On April 16, 2021, shortly after the Saginaw demonstration ended, Davidson notified Patel about the clinic "blockage." Patel forwarded the information to the U.S. Attorney's Office asking whether it is a good time to "revisit the Sterling Heights blockade."[140] Carlson responded that she does "not have the support of [her] unit chief. This may change, however, if the same actors are involved in the Saginaw incident."[141]

The Biden DOJ Pursued More Significant Charges after the Texas Heartbeat Bill and *Dobbs*

In December 2021—a year after the USAO's initial declination—Patel contacted Carlson again about the Sterling Heights case. Carlson e-mailed her supervisor, explaining that Patel's "management [wa]s very eager to pursue the prosecution now given some events that have occurred since then [Carlson believed this referred to Texas's Heartbeat Law]."[142] Carlson acknowledged her supervisor's "strong opinions" against charging the misdemeanor case when it first happened because "there was no violence or damage to the clinic."[143] But Carlson explained that she agreed with CRT that the case should be reopened "[g]iven the recent directive from [Deputy Attorney General Lisa Monaco] . . . ."[144]

Several days later, Carlson confirmed that Patel "[wa]s not aware of any FACE Act prosecutions involving non-violent violations *yet*. But the posture of the administration and his particular office has changed so he expects that there will be. His office definitely plans on moving forward with this and would prefer to do it with us."[145]

In January 2022, Carlson informed her supervisor that CRT "would like to know if our office will do the prosecution with them. I think we should. Either way, CRT will proceed with the prosecution."[146] Shortly after, Carlson met with her USAO leadership. The then newly confirmed United States Attorney (USA) Dawn Ison expressed concerns about delay, the current state prosecution, and being the first non-violent FACE Act prosecution in the country. USA Ison explained that, if the USAO could maintain some control over the case and CRT obtained a *Petite*

[140] E-mail from Patel, to Carlson (Apr. 16, 2021) (Exhibit 065).

[141] *Id*.

[142] E-mail from David Gardey, to Carlson (Jan. 4, 2022) (Exhibit 117).

[143] *Id*.

[144] *Id.* On October 21, 2022, DAG Monaco issued a protocol for high-profile civil rights incidents, which included "the use or threat of force against a person seeking to provide or obtain reproductive health services" under § 248. *See* U.S. Dep't of Just., Just. Manual § 8-3.135, https://perma.cc/7ASB-DKN8 (last visited Feb. 27, 2026). There was, however, no evidence of force or threats of force for the Sterling Heights or Saginaw demonstration.

[145] *Id.*

[146] *Id.*

waiver,[147] she would approve joining the prosecution. Carlson relayed USA Ison's position to Patel, and, on January 28, 2022, the USAO decided to join the prosecution.

In early May 2022, shortly after the *Dobbs* leak, Deputy Chief Bobbi Bernstein contacted Patel about the status of this matter.[148] Shortly thereafter, Patel, Laura-Kate Bernstein, Principal Deputy Chief Fitzgerald, and Deputy Chief Bernstein sought authorization from Deputy Assistant Attorney General Moossy to charge misdemeanor FACE Act violations for both demonstrations.

On May 19, 2022, Deputy Chief Bernstein notified Patel that she had spoken with Principal Deputy Chief Fitzgerald, and that "[Fitzgerald] is very much inclined to" bring charges under 18 U.S.C. § 241, "so that the Ds will have felonies and will be barred from possessing firearms."[149] Patel initially disagreed, stating that the "best play" would be to pursue FACE Act charges against these defendants because they could proceed to trial quickly and five of the defendants were already facing 18 U.S.C. § 241 charges in Tennessee.[150] Principal Deputy Chief Fitzgerald, however, explained that "Detroit seems like it would have a jury pool that would be more accepting of the FACE Act than TN," ultimately persuading Patel to move forward with the 18 U.S.C. § 241 charges.[151]

In early June, Carlson told her supervisor,

> [The CRT] bosses feel strongly about the felony charges. If we feel differently, they plan to go forward on their own with the prosecution. Of course, they would prefer to do the case with us so if it would be helpful, they would like to have a call with you and our "front office."[152]

Around this time, Carlson's supervisor recused himself and stopped supervising the case.[153] CRT reached out again to the AUSA, reminding that DOJ wanted to charge everyone in the conspiracy if there was evidence of concerted conduct, which was what the Middle District of Tennessee planned to do with their case.[154]

In mid-June, USA Ison explained to her staff that, if CRT wanted to go forward with the felony, then she felt the United States Attorney's Office had to join them.[155] USA Ison requested a new prosecution memorandum, to lay out the facts of the case, potential charges and defenses,

---

[147] *See* discussion of *Petite* policy, *infra* at 25.

[148] E-mail from Deputy Chief Bernstein, to Patel (May 6, 2022) (Exhibit 118).

[149] E-mail from Deputy Chief Bernstein, to Principal Deputy Chief Fitzgerald (May 19, 2022) (Exhibit 119).

[150] *Id.*

[151] *Id.*

[152] E-mail from Gardey, to Carlson (June 2, 2022) (Exhibit 120).

[153] E-mail from Gardey, to Carlson (Jan. 4, 2022) (Exhibit 117).

[154] *See generally* E-mail from Patel, to Carlson (Jun. 13, 2022) (Exhibit 121).

[155] *See generally id.*

and the Government's ability to meet its burden of proof at trial.[156] Carlson drafted the memorandum with help from CRT, which sought approval to charge nine defendants with felony conspiracy against rights (18 U.S.C. § 241) violations and two misdemeanor FACE Act violations.

Petite Waiver Request

As previously mentioned, Idoni and Edl were convicted in state court for actions in connection with the Saginaw demonstration. Accordingly, pursuant to DOJ's *Petite* Policy, DOJ attorneys could only pursue federal charges against these defendants if they obtained approval from AAG Clarke and could demonstrate that: (1) the matter involved a substantial federal interest; (2) the prior prosecution left that interest demonstrably unvindicated; and (3) the government believed that the defendants violated a federal statute and that the admissible evidence probably would be sufficient to sustain and maintain a conviction by an unbiased trier of fact.[157]

In October 2022, Patel submitted a *Petite* waiver request to charge Idoni and Edl with a federal misdemeanor FACE Act violation for the Saginaw demonstration.[158] Patel explained that the matter involved substantial federal interests, regardless of the state convictions, because the defendants "will continue to engage in obstructive conduct that interferes with the provision of abortion care because of their strongly held ideologies."[159] He explained that "[t]hrough this prosecution, we may be able to bring future felony charges" against them.[160] Patel reasoned that

> The Clinic and their corresponding national Non-Governmental Organizations (NGO) stakeholders are very committed to pursuing a federal prosecution. . . . Similarly, NGOs, including the National Abortion Federation and Feminist Majority Foundation, have on several occasions contacted federal authorities and expressed their and the Clinic's strong interest in the Department of Justice pursuing a federal FACE Act prosecution here.[161]

In November 2022, CRT transmitted a revised version of its *Petite* waiver request to AAG Clarke for her approval.[162] Among other modifications, the revised request omitted this language from Patel's draft, downplaying the role that pro-abortion advocacy groups played in CRT's decision to pursue these charges against the Defendants. He cited to Attorney General Merrick Garland's statements about DOJ's post-*Dobbs* commitment to "tirelessly protect and advance

[156] *See* E-mail from L. Bernstein, to Carlson (Oct. 18, 2022) (Exhibit 122).

[157] *See* U.S. Dep't Just., Just. Manual § 9-2.031.

[158] *See* Draft Memorandum from Criminal Chief Felte, to AAG Clarke (Oct. 28, 2022) (Exhibit 123).

[159] *Id*.

[160] *Id.*

[161] *Id.*

[162] *Compare* Memorandum from Criminal Chief Felte, to AAG Clarke (Nov. 30, 2022) (Exhibit 124), *with* Draft Memorandum from Criminal Chief Felte, to AAG Clarke (Oct. 28, 2022) (Exhibit 123).

reproductive freedom" and use the FACE Act "to protect healthcare providers and individuals seeking reproductive health services."[163]

Felony Indictment and Arraignment

Patel, Carlson, and a second AUSA, Sunita Doddamani, presented the case to the grand jury. The indictment charged Calvin Zastrow, Gallagher, Idoni, Curry, Phillips, Eva Edl, and Eva Zastrow, with conspiracy against rights, in violation of 18 U.S.C. § 241, and clinic access obstruction, 18 U.S.C. § 248, for their involvement in the Sterling Heights demonstration.[164] It also charged Idoni and Edl with clinic access obstruction under the FACE Act for their involvement in the Saginaw demonstration. In March 2023, the Defendants were arraigned. Carlson complained about the magistrate judge overseeing the arraignment:

> Unfortunately, we ended up with a **very Catholic magistrate** on duty this week and he was very particular about the bond conditions and not infringing on their first amendment rights. At the end, we ended up with overly lawyered bond conditions that would be difficult to enforce![165]

Jury Selection

The Biden DOJ prosecutors sought to identify and screen Christian jurors from the jury pool simply because they were Christian, without imperiling pro-abortion jurors.

The first effort was in May 2024, when they prepared a proposed voir dire to submit to the court. In preparing the document, the trial team struggled with what questions to ask, with a CRT Deputy Chief at one point cautioning his subordinate that "conservative judges" could be "upset by some of" questions they were considering as some "seem very one-sided."[166]

The Biden DOJ trial team considered ways of asking about potential jurors' religion, with Bernstein noting that she could not think of an "anodyne way to ask" questions about "religion, how often people go to services, etc."[167] They contemplated asking whether potential jurors had ever "contributed to any group" that "advocates for any aspect of reproductive health care," but a CRT attorney ultimately expressed concern that the question could lead to the "court excusing for-cause" individuals with pro-abortion views.[168] The team ultimately did not raise those specific

---

[163] Memorandum from Criminal Chief Felte, to AAG Clarke (Nov. 30, 2022) (Exhibit 124).

[164] Indictment, *United States v. Zastrow*, No. 2:23-cr-20100 (E.D. Mich. Feb. 15, 2023).

[165] E-mail from Carlson, to Patel (Mar. 10, 2023) (Exhibit 125) (emphasis added).

[166] E-mail from Deputy Chief Bernstein, to L. Bernstein (Mar. 17, 2024) (Exhibit 126).

[167] E-mail from L. Bernstein, to Carlson (May 15, 2024) (Exhibit 127). The use of peremptory strikes to exclude a potential juror on the basis of actual or perceived protected classes violates the Equal Protection Clause. *See Batson*, 476 U.S. at 89; *J.E.B. v. Alabama ex rel. T.B.*, 511 U.S. 127, 143 (1994). Strikes based on purposeful discrimination "undermine public confidence in the fairness of our system of justice" and violate the defendants' right to "be tried by a jury whose members are selected pursuant to nondiscriminatory criteria." *Batson*, 476 U.S. at 86-87.

[168] *See* Draft Proposed Voir Dire Questions, *United States v. Zastrow*, No. 2:23-cr-20100 (Exhibit 128).

questions in the voir dire filed with the court, reasoning that they could be "less concerned about the proposed voir dire" once the judge allowed a jury questionnaire, which would give the information they wanted.[169]

The judge adopted questions into the jury questionnaire that the Biden DOJ proposed. While the final phrasing was unremarkable, internal drafts indicate what types of information the trial team hoped to glean from the answers, such as how frequently the jurors attend services[170] or whether their children attend religious schools.[171]

Throughout the process, they searched for "an indirect way to get some more info about religion without directly asking it."[172] The trial notes are consistent with this approach. The Biden DOJ prosecutors flagged several Christian jurors for peremptory and for-cause strikes from the jury pool because of their faith.[173]

Trial

The trial team requested that the court limit the defendants' ability to wear "Jesus buttons" to the trial.[174] For example, on the day that Carlson asked for a limiting instruction, C. Zastrow was wearing a button that says, "Jesus is Lord." Doddamani raised concerns about "improper messaging" to the jury. The judge was skeptical, as the trial testimony and exhibits offered by both sides would involve the defendants' religious views.[175]

In closing argument, Carlson made the following numerous statements about the Defendants' religious beliefs and pro-life views:

- "If the defendants were looking for meaningful conversation, they sure didn't act like it. [] What the defendants cared about was **their own version of reality**. What they cared about was depriving the women in the parking lot of their right to obtain reproductive health services. What they cared about was the supremacy of their beliefs about women who came to reproductive health clinics and their -- **the supremacy of their beliefs over the law**. What they cared about was deciding for women, deciding for women that they should not be able to exercise a legal right that they have. [ ] The defendants were in that parking lot

[169] E-mail from L. Bernstein, to Carlson (May 15, 2024) (Exhibit 127).

[170] Draft Proposed Juror Questionnaire Instructions, *United States v. Zastrow*, No. 2:23-cr-20100 (Exhibit 129).

[171] *Id.*

[172] *Id.*

[173] The responses to juror questionnaires are sealed for juror privacy. *See* Juror Questionnaire Instructions, *United States v. Zastrow*, No. 2:23-cr-20100 (E.D. Mich. May 15, 2024), dkt. no. 254 ("The questions are not intended to unnecessarily inquire into personal matters; all information obtained will be kept confidential."). As a result, DOJ is treating internal deliberations and summaries of the responses as subject to the same seal as the juror questionnaire responses.

[174] Transcript of Hearing Regarding Potential Juror Responses to Questionnaires, at PageID.2351-56, *United States v. Zastrow*, No. 2:23-cr-20100 (E.D. Mich. Aug. 19, 2024), Dkt. No. 371.

[175] *Id.*

because **they believed they knew better**. They knew better than [Patient 1] about the choices that she should make in her life. The defendants didn't care about [Patient 1] and they certainly did not care about the law. **They didn't care about anything but their own beliefs**."[176]

- "We are here today because the defendants believed that they are above the law. [ ] We are here because **they believe that they have a right to oppress and intimidate by imposing their will on others and that they can violate the law without being held accountable**."[177]

During rebuttal argument, Doddamani made the following statements:

- "And like when the defendants were taking video of people in their cars without their permission, it's an **expected result** that that would make them **feel fearful** and that they would **turn away from that clinic. I'd be turning away from that if I saw that at the grocery store. Let alone a medical clinic.** The same thing with the people who they were calling baby murderers or telling them to repent for their sins."[178]

- "There's a version of the argument we heard from the defense. These women basically overreacted to what we were politely doing. Right? **They're essentially here calling the witnesses, the employees, and the patients snowflakes. Right? In their view, these women were just overreacting. Like women do. Right? Which is stereotypical nonsense.**"[179]

While drafting her rebuttal, Doddamani compared pro-life Christians to cult members, describing them and the terms they used as "culty."[180]

---

[176] Transcript of Jury Trial, Volume 10, at PageID.4283-84, *United States v. Zastrow*, No. 2:23-cr-20100 (E.D. Mich. Aug. 19, 2024), Dkt. No. 382 (emphasis added).

[177] *Id.* at PageID.4288-89 (emphasis added).

[178] *Id.* at PageID.4391-92 (emphasis added). Inviting jurors "to place themselves in the victim's shoes violates the ban on Golden Rule arguments." *United States v. Hall*, 979 F.3d 1107, 1119 (6th Cir. 2020). A "Golden Rule" appeal asks the jury "to put itself in the [victim's] position" and "is *universally recognized as improper* because it encourages the jury to depart from neutrality and to decide the cases on the basis of personal interest and bias rather than the evidence." *Id.* (emphasis in original) (internal quotations omitted).

[179] *Id.* at PageID.4392 (emphasis added).

[180] E-mail from L. Bernstein, to Carlson (Aug. 18, 2024) (Exhibit 130).

C. *United States v. Houck*: The Biden DOJ Used Aggressive Arrest Tactics Against a Pro-Life Defendant Who Was Subsequently Acquitted.

On October 13, 2021, Mark Houck, "a devoted pro-life Catholic and father of seven," took his twelve-year son with him to speak outside of a Planned Parenthood location.[181] While speaking outside of the facility, Houck encountered a Planned Parenthood escort. When the clinic escort confronted his son with ridicule and profanity, Houck stepped in to protect his child and pushed the escort, scraping his arm.[182]

That week, Planned Parenthood's local Senior Director of Security contacted the FBI, requesting assistance and stating the "objective of this would be to obtain an injunction similar" to a 2011 civil action filed by DOJ.[183] The FBI forwarded this email to Patel,[184] who forwarded the Planned Parenthood inquiry to one of the deputy chiefs, saying that this "looks like a good felony FACE matter" and that he would open a new matter and assign it to himself.[185] Patel spent the next several months persuading his supervisors to allow him to file charges against Houck. Supervisors voiced concerns that the incident seemed unrelated to any intent to interfere with clinic access.[186] They agreed that Patel's additional investigation mitigated litigation risk and noted that the "USAO really wants to proceed in this matter, and the FBI is on board."[187]

In other exchanges, AUSAs in the Eastern District of Pennsylvania wanted to confirm that the Houck matter would be the "first post-Dobbs FACE indictment."[188] In an email chain discussing the plan to arrest Houck and prep press releases, an AUSA disparaged Houck's defense counsel, expecting them "to be particularly . . . Unpleasant."[189] In a separate email chain, Patel derogatorily described these attorneys—a pro-life public interest law firm—as "quite the racket."[190] Houck's attorneys offered to accept a summons and bring him in voluntarily if DOJ proceeded with a criminal case,[191] but DOJ and the USAO declined to pursue a summons and

[181] Indictment, *United States v. Houck*, No. 2:22-cr-00323 (E.D. Pa. Sept. 20, 2022).

[182] *See* E-mail from Patel, to Principal Deputy Chief Fitzgerald (Nov. 19, 2021) (Exhibit 131).

[183] E-mail from [Redacted], FBI, to Patel (Oct. 18, 2021) (Exhibit 066) (forwarding e-mail from Planned Parenthood).

[184] *Id*.

[185] E-mail from Patel, to Sheldon Beer (Oct. 18, 2021) (Exhibit 132).

[186] E-mail from Principal Deputy Chief Fitzgerald, to Patel (Nov. 18, 2021) (Exhibit 133).

[187] E-mail from Beer, to Principal Deputy Chief Fitzgerald (Aug. 10, 2022) (Exhibit 134); E-mail from Principal Deputy Chief Fitzgerald, to Beer (Aug. 18, 2022) (Exhibit 135).

[188] E-mail from Patel, to Eve (Aug. 31, 2022) (Exhibit 136).

[189] E-mail from Gibson, to Eve (Sept. 16, 2022) (Exhibit 137).

[190] *See* E-mail from Patel, to Ashley Martin (Jan. 21, 2023) (Exhibit 138).

[191] E-mail from Matt Heffron, Thomas More Soc'y, to Eve (June 9, 2022) (Exhibit 139).

allow Houck to self-surrender, instead deferring to the FBI's plan to arrest.[192] DOJ, the USAO, and the FBI coordinated in advance and approved of the plan to arrest.[193]

On September 20, 2022, the USAO for the Eastern District of Pennsylvania secured a two-count indictment against Houck under the FACE Act.[194] At 7:03 A.M. on September 23, 2022, sixteen FBI agents arrived at Houck's home in seven vehicles. The officers were visibly armed. They arrested and handcuffed Houck outside his front door while his family watched from inside.[195] Shortly after the arrest, the Special Agent notified Patel and the AUSA that Houck was in custody.[196]

Public outcry about the arrest and show of force was swift. When CRT leadership wanted to understand what happened, the Task Force Director pointed at the FBI, stating that he and the USAO "urged FBI to allow [Houck] to self-surrender."[197] No emails in the contemporaneous record support that statement. In a later assessment of lessons learned for upcoming Tennessee FACE indictments, Patel gave his view that the FBI's "main reason" for arrest rather than allowing self-surrender was to seize phones for search warrants, but that "I think the unspoken reason is bc the FBI really likes to make arrests."[198] When the DOJ team began to receive emails from the public about the arrest, one AUSA complained about the defendant's family: "The tragedy is that Mrs. Houck is attempting to taint the public's view of the arrest and prosecution."[199]

At trial, Houck's attorneys argued that the abortion escort was the aggressor in the encounter, and, on January 30, 2023, the "jury returned a verdict of 'not guilty,' acquitting Mark Houck."[200] Houck and his wife subsequently filed lawsuits "against the FBI and DOJ for malicious and retaliatory prosecution, abuse of process, false arrest and assault."[201] The United States recently reached a settlement agreement with Houck.[202]

---

[192] E-mail from Patel, to Eve (Sept. 17, 2022) (Exhibit 140).

[193] E-mail from [Redacted], FBI, to Eve (Sept. 20, 2022) (Exhibit 141); E-mail from [Redacted], FBI, to Eve (Sept. 22, 2022) (Exhibit 142).

[194] Indictment, *United States v. Houck*, No. 2:22-cr-00323 (E.D. Pa. Sept. 20, 2022).

[195] *See* E-mail from Sparkle Sooknanan, to Anders Folk (Sept. 27, 2022) (Exhibit 143).

[196] E-mail from Patel, to [Redacted], FBI (Sept. 23, 2022) (Exhibit 144).

[197] E-mail from Patel, to Criminal Chief Felte (Oct. 17, 2022) (Exhibit 145). *See also* E-mail from Patel, to Criminal Chief Felte (Oct. 18, 2022) (Exhibit 146).

[198] E-mail from Patel, to Criminal Chief Felte (Oct. 4, 2022) (Exhibit 147).

[199] E-mail from Eve, to Patel (Sept. 26, 2022) (Exhibit 148).

[200] Docket, *United States v. Houck*, No. 2:22-cr-00323, at Dkt. No. 68 (E.D. Pa.); Judgment of Acquittal/Not Guilty, *United States v. Houck*, No. 2:22-cr-00323 (E.D. Pa. Jan. 30, 2023), Dk. No. 70; E-mail from Patel, to Criminal Chief Felte (Jan. 30, 2023) (Exhibit 149); E-mail from DAAG Moossy, to Sooknanan (Jan. 30, 2023) (Exhibit 150).

[201] Peter Pinedo, *Mark Houck and Wife Sue FBI and DOJ for Malicious Prosecution: Era of Targeting Pro-Lifers 'Is Over'*, NAT'L CATHOLIC REG. (Nov. 8, 2023), https://www.ncregister.com/cna/mark-houck-and-wife-sue-fbi-and-doj-for-malicious-prosecution-era-of-targeting-pro-lifers-is-over.

[202] Amended Joint Status Report of Parties, *Houck v. United States*, No. 25-1433 (3d Cir. Jan. 7, 2026).

V. THE BIDEN DOJ'S SENTENCING DISPARITIES

The Biden DOJ routinely pursued comparatively harsher sentences against pro-life FACE Act defendants. In cases involving non-violent conduct under the FACE Act, DOJ pursued significantly higher sentences against pro-life defendants than pro-choice defendants: on average, 26.8 months for the former versus 12.3 months for the latter. The individual sentencing requests and sentences are summarized in the following chart: [203]

Pro-Life Defendants	Request (in months)	Sentence (in months)
United States v. Handy		
Handy	78	57
Darnel	51	34
Harlow	41	24
Marshall	41	24
Hinshaw	33	21
Idoni	41	24
Goodman	41	27
Bell	41	27
Geraghty	41	27
United States v. Gallagher		
Gallagher	20	16
Idoni	18	8
C. Zastrow	24	6
Boyd	15	0
Vaughn	12	0
Green	15	0
Edl	0	0
E. Zastrow	0	0
J. Zastrow	0	0
Place	0	0
United States v. Moscinski		
Moscinski	6	6
United States v. Williams		
Beatty	46	41
Average	26.8 months	14.7 months

Pro-Abortion Defendants	Request (in months)	Sentence (in months)
Florida Jane's Revenge		
Freestone	12	12
Smith-Stewart	16	1
Rivera	16	1
Oropesa	24	4
United States v. Durant		
Durant	0	0
United States v. Skorick		
Skorick	6	0
Average	12.3 months	3 months

See Table Notes. [204]

[203] *Cf.* E-mail from Patel, to L. Bernstein (Sept. 3, 2024) (Exhibit 151) (providing sentencing data but noting they lack reliable statistics on "criminal activity targeting reproduction health providers" because "NGOs, particularly NAF who tracks these stats, won't admit clinic criminal activity is trending down (even though it actually is)").

[204] This chart does not include the sentencing recommendations of FACE Act defendants who committed violent attacks, but rather assesses the closest possible comparators, whose cases this report discusses. The data presents the Biden DOJ's high-end sentencing request.

Vaughn and Green were sentenced to time served. Boyd, Davis, Edl, Eva Zastrow, James Zastrow, and Place were sentenced to probation. For purposes of calculating average sentences, Vaughn and Green were treated as if they had served sentences of zero days.

Several of the pardoned cases had additional relevant notes regarding sentencing:

- ***United States v. Calvin Zastrow*, *et al.*, Case No. 2:23-cr-20100 (E.D. Mich.):** The jury returned guilty verdicts on all counts in August 2024. After the 2024 presidential election, the judge sua sponte stayed the post-trial briefing given the possible likelihood that DOJ's position on the issues in the case could change. On January 23, 2025, President Trump issued a full and unconditional pardon for all Defendants, and the United States Attorney's Office for the Eastern District of Michigan moved to dismiss the case.

- ***United States v. Christopher Moscinski*, Case No. 2:22-cr-00485 (E.D.N.Y.):** Fr. Moscinski's attorney requested a sentence of time served, given his "lifetime of service to the poor and lack of any personal benefit from the offense of conviction," but DOJ prosecutors asked the court to "impose the maximum term of six month's imprisonment," highlighting Fr. Moscinski's "long history of violating the law."[205] The court sentenced Fr. Moscinski to six months' imprisonment.

- ***United States v. Bevelyn Beatty Williams et al.*, Case No. 1:22-cr-00684 (S.D.N.Y.):** Beatty was sentenced to 41-months in prison.[206] Patel congratulated the team on the "incredible result" and the "top end guidelines sentence."[207]

In total, during the four years under President Biden, DOJ charged "more than 45 [pro-life] defendants in over 20 cases" with violating the FACE Act in connection with pro-life demonstrations.[208] This was a significant increase in FACE Act prosecutions compared to prior administrations.[209] CRT's Special Litigation Section also brought numerous civil FACE Act cases against many of these same pro-life Christians.[210] The Special Litigation Section did not bring any

---

Regarding E. Zastrow, DOJ stated that, "[b]ut for the sentencing disparity it would create with other defendants [due to the court's downward variance in imposing sentences], the government would submit that a sentence of three months of incarceration and no fine would be sufficient." DOJ requested a sentence of probation.

The Biden DOJ requested that the court sentence Durant to at least one year of probation.

[205] Government's Sentencing Memorandum, *United States v. Moscinski*, No. 2:22-00485 (E.D.N.Y. Jun. 20, 2023), Dkt. No. 28; Sentencing Memorandum of Christopher Moscinski, *United States v. Moscinski*, No. 2:22-00485 (E.D.N.Y. Jun. 22, 2023), Dk. No. 29.

[206] E-mail from Patel, to Criminal Chief Felte (July 24, 2024) (Exhibit 152).

[207] E-mail from Patel, to Jacqueline Kelly (July 24, 2024) (Exhibit 153); *see also* E-mail from Patel, to Mitzi Steiner (July 24, 2024) (Exhibit 154).

[208] E-mail from Patel, to Criminal Chief Felte (May 28, 2024) (Exhibit 111) (summarizing the FACE Act charges the Department of Justice had brought since January 2021).

[209] *See* Leif Le Mahieu, *Biden-Harris DOJ Seeks Jail Time for Pro-Lifers Convicted Over Peaceful Protest*, DAILY WIRE (Aug. 5, 2024), https://perma.cc/S2VT-8Z7P (last visited Feb. 27, 2026) ("[T]he Biden-Harris administration has brought a grand total of 25[] percent of all the FACE cases ever brought since its inception in 1994 in the last two years[.]") (internal quotations omitted).

[210] *See* Amended Complaint, *United States v. Zastrow*, No. 2:24-cv-00576 (M.D. Fl. Jun. 27, 2024) (seeking injunctive relief against C. Zastrow, Gallagher, and E. Zastrow); Complaint and Jury Demand, *United States v. Citizens for a Pro-Life Society, Inc.*, No. 1:24-cv-00893 (N.D. Ohio May 20, 2024) (seeking injunctive relief against Handy, Fr. Moscinski, and Smith and highlighting their non-violent demonstrations throughout the country).

civil FACE Act cases in response to protests or destruction at pregnancy centers or houses of worship during the Biden administration.

At the same time, the Biden DOJ largely ignored attacks on pro-life pregnancy resource centers, only charging five people for vandalism and attacks against these healthcare facilities.[211] Based on DOJ's review of the related correspondence, it appears that CRT began following up on "allegations of criminal conduct involving abortion alternative facilities" in earnest after the significant public outcry and congressional response to Houck's arrest.[212] Patel wrote about the Florida matter that, "[f]rom my perspective, I have a very strong interest in charging a Jane's Revenge subject."[213] In response to a concern about his bandwidth, Patel explained that "I definitely need to keep the new MDFL FACE matter bc it may be the first FACE case we bring with a pro-life victim."[214] In preparation for the Criminal Chief's upcoming meeting with DAG Monaco, Patel flagged that he was "glad to report that we are actively working … on three separate Jane's incidents … in hopes of bringing charges soon."[215] The *Freestone* indictment was unsealed on the first day of Houck's FACE Act trial, January 23, 2023.[216]

The three FACE Act prosecutions of destruction to pregnancy resource centers involved the following facts:

Florida Attack: Between May and July 2022, Caleb Freestone, Amber Smith-Stewart, and Annarella Rivera engaged in a series of targeted attacks on pro-life pregnancy help centers in Florida," spray painting the facilities with messages, including "'If abortions aren't safe than niether [sic] are you,' 'YOUR TIME IS UP!!,' 'WE'RE COMING for U' and 'We are everywhere.'"[217] Below is a photo of one of the threatening messages left by defendants:[218]

---

[211] E-mail from Principal Deputy Chief Fitzgerald, to DAAG Moossy (Sept. 17, 2021) (Exhibit 155) (circulating a list of the "FACE-related cases" CRT has "done over the past 10 years"; none involved a house of worship or pregnancy resource center).

[212] *See* E-mail from Patel, to Criminal Chief Felte (Oct. 17, 2022) (Exhibit 145).

[213] E-mail from Patel, to Samantha Trepel (Oct. 3, 2022) (Exhibit 156).

[214] *See* E-mail from Patel, to Gibson (Oct. 6, 2022) (Exhibit 157).

[215] *See* E-mail from Patel, to Criminal Chief Felte (Oct. 17, 2022) (Exhibit 145).

[216] *Compare* Press Release, U.S. Dep't of Just., *Two Defendants Indicted for Civil Rights Conspiracy and FACE Act Offenses Targeting Pregnancy Resource Centers* (Jan. 24, 2023), https://perma.cc/YV3M-6HXJ, *with* Minute Entry: Jury Trial Day 1, *United States v. Houck*, 2:22-cr-00323 (E.D. Pa. Jan. 24, 2023), dkt. no. 64.

[217] Press Release, U.S. Dep't of Just., Three Defendants Plead Guilty to a Civil Conspiracy Targeting Pregnancy Resource Centers (June 14, 2024), https://perma.cc/AH8X-FYGS.

[218] *Greg Wehner, 3 Charged in Attacking Florida Pro-Life Pregnancy Center Plead Guilty: DOJ*, FOX NEWS (June 16, 2024), https://perma.cc/DM2T-B444.



Freestone, Smith-Stewart, and Rivera were charged with violating the FACE Act, and all three pleaded guilty. Freestone was sentenced to one year and a day in prison, and Smith-Stewart and Rivera each received sentences of 30 days in prison and 60 days in home detention.[219]

Ohio Attack: On April 15, 2023, Whitney Durant vandalized "a reproductive health services clinic located in Bowling Green, Ohio, because the clinic offers pregnancy counseling, free pregnancy testing and ultrasounds, but not abortion services."[220] Specifically, Durant spray painted the words: "LIARS," "FAKE CLINIC," "Fund Abortion," "Abort God," and "Jane's Revenge."[221] Below is a photo of Durant's graffiti attack on the clinic.[222]

[219] Press Release, U.S. Dep't of Just., *Florida Man Sentenced for Civil Rights Conspiracy Targeting Pregnancy Resource Centers* (Sept. 12, 2024), https://perma.cc/5EZU-XU9H.

[220] Press Release, U.S. Attorney's Off., N.D. Ohio, A Ohio Woman Sentenced for Violation of Freedom of Access to Clinic Entrances (FACE) Act Violation for Damaging Pregnancy Center (Apr. 12, 2024), https://perma.cc/2CNA-GLJZ.

[221] *Id.*

[222] Joe Bukuras, *FACE Act Charges Brought Against College Student in Ohio Pregnancy Center Attack,* CATHOLIC NEWS AGENCY (July 11, 2023), https://perma.cc/N59J-HCWQ.



DOJ charged Durant with a misdemeanor FACE Act violation.[223] Whitney pleaded guilty and was sentenced to two years of probation and a $2,000 dollar fine.[224]

Texas Attack: On May 7, 2022, Ethan Skorick "intentionally damaged the property of pregnancy resource centers located in Denton, Texas," by spray painting the following on the "clinics' buildings, doors and security cameras:" "NOT A CLINIC," "FORCED BIRTH IS MURDER," and "PRO BIRTH [does not equal] PRO LIFE."[225] Skorick pleaded guilty to a "misdemeanor charge under the" FACE Act. Skorick was sentenced to five years' probation and ordered to pay $2,989.05 in restitution.[226]

Notably, the FACE Act also prohibits interfering with access to houses of worship. During the Biden Administration, there were numerous violent attacks against religious institutions in connection with those organization's pro-life views.[227] Indeed, in light of that violence, members of the U.S. Senate specifically requested that Attorney General Garland use the FACE Act to protect houses of worship.[228] Despite the increased hostility faced by houses of worship, the Biden DOJ did not pursue a single FACE Act case involving houses of worship during this time.

---

[223] Press Release, U.S. Attorney's Off., N.D. Ohio, Bowling Green State University Student Charged with FACE Act Violation (July 5, 2023), https://perma.cc/9DZN-XPHN.

[224] Press Release, U.S. Attorney's Off., N.D. Ohio, Ohio Woman Sentenced for Violation of Freedom of Access to Clinic Entrances (FACE) Act Violation for Damaging Pregnancy Center (Apr. 12, 2024), https://perma.cc/2CNA-GLJZ.

[225] Press Release, U.S. Dep't of Just., Texas Defendant Pleads Guilty to Freedom of Access to Clinic Entrances (FACE) Act Violation (Jan. 16, 2025), https://perma.cc/KPZ3-ZEVF.

[226] Judgment in a Criminal Case, *United States v. Skorick*, No. 4:24-cr-00255 (E.D. Tex. May 28, 2025).

[227] Expressing the sense of the House of Representatives condemning the recent attacks on pro-life facilities, groups, and churches, H.R. Res. 1233, 117th Cong. (July 19, 2022), https://perma.cc/Q7YP-NL3G.

[228] Letter from Sens. Michael S. Lee and Ted Cruz to Attorney General Merrick Garland (Sept. 23, 2022), available at https://perma.cc/6SM7-3HDM (pages 16-28). *See also* E-mail from Patel, to Criminal Chief Felte (Oct. 18, 2022), *supra* 30 n.197 (Exhibit 145).

VI. THE TRUMP ADMINISTRATION'S WORK TO RIGHT PRIOR WRONGS

The Biden DOJ's actions were wrong. The Trump Administration took immediate steps to restore the public's confidence in the Department and to address the Biden DOJ's unequal application of the FACE Act. On January 23, 2025, President Trump issued full and unconditional pardons[229] to numerous pro-life defendants, including:

Lauren Handy	Coleman Boyd
Jonathan Darnel	Paul Vaughn
Paula Harlow	Dennis Green
Jean Marshall	Eva Edl
John Hinshaw	Eva Zastrow
Heather Idoni	James Zastrow
William Goodman	Paul Place
Joan Bell	Joel Curry
Herb Geraghty	Justin Phillips
Chester Gallagher	Bevelyn Beatty Williams
Calvin Zastrow	Fr. Christopher Moscinski

DOJ is working to restore these defendants' civil rights that were curtailed as a result of their later-pardoned convictions. DOJ also recently settled claims stemming from a couple of these criminal prosecutions.[230]

On January 24, 2025, the DOJ's new leadership acknowledged that the Biden DOJ's effort to enforce the FACE Act was not an "even-handed administration of justice," issuing a memorandum to guide prosecutorial decisions under the FACE Act going forward:[231]

> [T]o ensure that federal law enforcement and prosecutorial resources are devoted to the most serious violations of federal law, future abortion-related FACE Act prosecutions and civil actions will be permitted only in extraordinary circumstances, or in cases presenting significant aggravating factors, such as death, serious bodily harm, or serious property damage. Cases not presenting significant aggravating factors can adequately be addressed under state or local law. Additionally, until further notice, no new abortion-related FACE Act actions—criminal or civil—will be permitted without authorization from the Assistant Attorney General for the Civil Rights Division.[232]

---

[229] Donald J. Trump, *Executive Grant of Clemency* (Jan. 23, 2025), https://perma.cc/2GJ9-L6Q7.

[230] *See, e.g.*, Amended Joint Status Report of Parties, *Houck v. United States*, No. 25-1433 (3d Cir. Jan. 7, 2026). A stipulation has been negotiated with a family of impacted individuals and is awaiting judicial approval.

[231] U.S. DEP'T OF JUST., OFFICE OF THE ASSOCIATE ATTORNEY GENERAL, FACE ACT CHARGING POLICY (Jan. 24, 2025), https://perma.cc/U7HK-37PT.

[232] *Id.* (directing CRT to dismiss, with prejudice, the following FACE Act cases: *United States v. Connolly*, No. 2:24-cv-04467 (E.D. Penn.); *United States v. Zastrow, et al.*, No. 2:24-cv-00576 (M.D. Fla.); *United States v. Citizens for a Pro-Life Soc'y*, et al., No. 1:24-cv-00893 (N.D. Ohio)).

The memorandum also directed CRT to "immediately dismiss, with prejudice," three civil lawsuits against peaceful, pro-life demonstrators. These civil cases had involved several of the same pro-life activists that the Biden DOJ had monitored for years and criminally charged, including Calvin Zastrow, Chester Gallagher, Eva Zastrow, Lauren Handy, and Christopher Moscinski. CRT promptly dismissed *United States v. Connolly*, *United States v. Zastrow, et al.*, and *United States v. Citizens for a Pro-Life Society*.

DOJ has taken appropriate personnel action to address this report's findings. This report does not disclose findings regarding internal misconduct investigations of any of the employees alleged to have been involved in the weaponization of the FACE Act. DOJ governs the conduct of its current employees through an internal disciplinary investigative system. Where appropriate, DOJ may refer current or former employees for criminal prosecution. Likewise, DOJ may refer current or former employees to the relevant bar association or highest judicial authority of the jurisdictions in which they are licensed to address compliance with applicable Rules of Professional Conduct. Here, internal referrals have been made as required by the Justice Manual.

Going forward, CRT will pursue meritorious cases under the FACE Act, when the facts and law support civil or criminal action, including obstruction and threats toward pregnancy resource centers and houses of worship. For example, in February 2025, CRT filed a statement of interest supporting the plaintiff in *Pollak v. Codepink Women for Peace*,[233] the first time that DOJ applied the FACE Act to a place of worship despite frequently applying it to the alleged obstructions of abortion clinics. In this case, plaintiffs alleged that protestors terrorized Jewish congregants outside their synagogue, blocked access, trapped others inside, and even attacked some worshippers with bear spray.[234] DOJ argued that the plain language of the FACE Act prohibits these kinds of physical obstructions of places of worship.[235]

DOJ is committed to prosecuting crime in a manner that is consistent with its mission "to uphold the rule of law, to keep our country safe, and to protect civil rights."[236] DOJ must act with independence, impartiality, honesty, integrity, excellence, and respect, valuing differences in people and in ideas and treating everyone with fairness, dignity, and compassion. Should other affected individuals have concerns about prosecutions pursued against them, DOJ will assess their allegations without fear or favor.

---

[233] Press Release, U.S. Dep't of Just., Justice Department Files Statement of Interest Supporting Access to Places of Worship (Mar. 3, 2025), https://perma.cc/WS9P-H2QR.

[234] Statement of Interest of the United States of America, *Pollak v. Codepink Women for Peace*, No. 2:24-cv-06253 (C.D. Cal. Feb. 28, 2025), dkt. no. 119.

[235] *Id.*

[236] *About DOJ*, U.S. Dep't of Just., https://www.justice.gov/about (last visited Jan. 7, 2026).

EXHIBIT 001

AMERICAN CENTER
for LAW & JUSTICE

T:
F:

August 8, 2022

Attorney General Merrick B. Garland
U.S. Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530-0001

RE: "Executive Order on Protecting Access to Reproductive Healthcare Services"

Dear Attorney General Garland:

The following letter is on behalf of the American Center for Law & Justice (ACLJ) and over 236,000 of its members who value and support prolife Pregnancy Resource Centers across the country.[1] The American Center for Law & Justice ("ACLJ") is an organization dedicated to the defense of constitutional liberties secured by law, including the defense of the sanctity of human life. Counsel for the ACLJ have presented expert testimony before state and federal legislative bodies, and have presented oral argument, represented parties, and submitted amicus curiae briefs before the Supreme Court of the United States and numerous state and federal courts in cases involving a variety of issues, including the right to life. *See, e.g., Pleasant Grove City v. Summum*, 555 U.S. 460 (2009); *Livingwell Med. Clinic, Inc. v. Becerra*, 138 S. Ct. 2701 (2018); *Dobbs v. Jackson Women's Health Org.*, 142 S. Ct. 2228 (2022); *June Medical Servs. v. Russo*, 140 S. Ct. 2103 (2020); *Nat'l Inst. of Family & Life Advocates v. Becerra*, 138 S. Ct. 2361, 2368 (2018); *Whole Woman's Health v. Hellerstedt*, 579 U.S. 582 (2016); *Gonzales v. Carhart*, 550 U.S. 124 (2007); *Schenck v. Pro-Choice Network*, 519 U.S. 357 (1997).

[1] *Petition: Stop the Shutdown of Pro-life Pregnancy Centers*, ACLJ.org, https://aclj.org/pro-life/stop-the-shutdown-of-pro-life-pregnancy-centers (last visited Aug. 4, 2022).

I. INTRODUCTION

On July 8, 2022, President Biden issued an Executive Order on Protecting Access to Reproductive Healthcare Services. While the entire Executive Order is of concern to the ACLJ and its members, of particular concern are the portions of the Executive Order that call on the Attorney General to first,

> address potential heightened safety and security risks related to the provision of reproductive healthcare services[.] [T]he Attorney General and the Secretary of Homeland Security shall consider actions, as appropriate and consistent with applicable law, to ensure the safety of patients, providers, and third parties, and to protect the security of clinics (including mobile clinics), pharmacies, and other entities providing, dispensing, or delivering reproductive and related healthcare services.[2]

Second,

> [t]he Secretary of Health and Human Services shall, in consultation with the Attorney General and the Chair of the FTC, *consider options to address deceptive or fraudulent practices related to reproductive healthcare services*, including online, and to protect access to accurate information.[3]

And finally,

> The Secretary of Health and Human Services and the Director of the Gender Policy Council shall establish and co-chair an Interagency Task Force on Reproductive Healthcare Access (Task Force). **Additional members shall include the Attorney General** and the heads of other agencies as determined by the Secretary of Health and Human Services and the Director of the Gender Policy Council. The Task Force shall work to identify and coordinate activities to protect and strengthen access to essential reproductive healthcare services. In addition, the Task Force shall coordinate *Federal interagency policymaking, program development, and outreach efforts to address barriers that individuals and entities may face in seeking and providing reproductive healthcare services.*[4]

---

[2] President Joseph R. Biden, Jr., Executive Order on Protecting Access to Reproductive Healthcare Services (July 8, 2022), https://www.whitehouse.gov/briefing-room/presidential-actions/2022/07/08/executive-order-on-protecting-access-to-reproductive-healthcare-services/ [hereinafter Executive Order].

[3] *Id.* (emphasis added).

[4] *Id.* (emphasis added).

II. SUMMARY OF MAIN CONCERN

Recently, Pregnancy Resource Centers, also known as Crisis Pregnancy Centers, have been under increasing attack, both by pro-abortion activists who have firebombed and vandalized Pregnancy Resource Centers across the nation[5] without any condemnation from President Biden, your Department, other pro-abortion supporters, or by pro-abortion politicians or state Attorneys General. President Biden's Executive Order poses yet another threat to Pregnancy Resource Centers by calling on the Secretary of Health and Human Services, the U.S. Attorney General, and the Chair of the FTC to "address deceptive or fraudulent practices related to reproductive healthcare services."[6] As we have detailed below, this language is frequently used in direct reference to Pregnancy Resource Centers, and it is the concern of the ACLJ that the administrative officials will use the language in the Executive Order as a basis to justify potentially unconstitutional targeting of Pregnancy Resource Centers for censorship and for elimination. The ACLJ opposes any such action, and stands ready to rigorously defend Pregnancy Resource Centers across the country.

III. IMPORTANCE OF PREGNANCY RESOURCE CENTERS AND THEIR RIGHT TO PROTECTION

In direct response to President Biden's Executive Order, on July 29, 2022, you delivered remarks stating, among other things, that: "The Justice Department is *working relentlessly* . . . [and] has a *tremendous responsibility to do everything in our power to protect access to reproductive services. That is what we intend to do.*"[7] Moreover, you stated that "the Department **will continue to enforce the FACE Act and protect healthcare providers and individuals** seeking reproductive health services . . . ."[8] Finally, you stated that "[t]he Justice Department's Reproductive Rights Task Force . . . *is vigilantly monitoring state laws and enforcement actions to ensure that states do not infringe upon these . . . rights.*"[9]

As is defined in President Biden's Executive Order, "'reproductive healthcare services' means *medical*, surgical, *counseling, or referral services* relating to the human reproductive system, *including services relating to pregnancy* or the termination of a pregnancy."[10]

---

[5] Emma Colton, *New York Pro-Life Pregnancy Center Allegedly 'Firebombed' by Left-Wing Group, Fox News Investigation Launched* (Jun. 7, 2022, 3:51 PM), https://www.foxnews.com/us/pro-life-pregnancy-firebombed-left-wing; Jessica Chasmar, *At Least 5 Pro-Life Pregnancy Centers Vandalized Within a Week of SCOTUS Opinion Leak*, Fox News (May 11, 2022, 1:37 PM), https://www.foxnews.com/politics/5-pro-life-pregnancy-centers-vandalized-scotus-leak.

[6] Executive Order, *supra* note 2.

[7] Merrick B. Garland, U.S. Att'y Gen., Remarks at the White House Convening of Lawyers in Defense of Reproductive Rights (July 29, 2022), https://www.justice.gov/opa/speech/attorney-general-merrick-b-garland-delivers-remarks-white-house-convening-lawyers-defense (emphasis added) [hereinafter Statement by AG Garland].

[8] *Id.* (emphasis added).

[9] *Id.* (emphasis added).

[10] Executive Order, *supra* note 2 (emphasis added).

First, while President Biden, the Secretary of Health and Human Services, and your office have made it quite clear that the overarching purpose of the Executive Order is to advance *abortion* and access to abortion, the ACLJ would like to take this opportunity to point out that prolife Pregnancy Resource Centers clearly fall under the Executive Order's definition of "reproductive healthcare services." Consequently, the Department of Justice should ensure that Pregnancy Resource Centers are included as part of the Department's enforcement of the FACE Act and provide protection to those facilities as well as do anything in its power to bring to justice those who have vandalized and threatened Pregnancy Resource Centers across the country.[11] Pregnancy Resource Centers play a critical role in providing choices to women experiencing unplanned pregnancies, such as the support necessary for keeping the baby, adoption, etc., that extend well beyond the one option that abortion clinics provide for women – ending the life of their unborn child.

As we detailed in our brief before the Supreme Court in *Livingwell Med. Clinic, Inc. v. Becerra*, 138 S. Ct. 2701 (2018), Pregnancy Resource Centers provide essential and professional services at no or, on occasion, nominal cost, such as: "pregnancy options education and consultation; pregnancy testing and verification; limited obstetrical ultrasounds; STI/STD testing, education, and treatment; past abortion healing retreats; community education presentations; and material support."[12] Other services Pregnancy Resource Centers provide "help[] women deal with unplanned pregnancies by offering, free of charge, a variety of educational, medical, and material resources, including ultrasounds, counseling and emotional support, and maternity and baby items."[13]

In fact, Pregnancy Resource Centers provide free or nominal cost assistance to millions of women annually, including hundreds of thousands of free ultrasounds each year (over 486,000 in 2019) along with medical services, education, and referrals.[14] In 2019, over 10,000 licensed medical professional served as paid or volunteer workers in 2,700 Pregnancy Resource Centers across the United States.[15] Thousands more people serve voluntarily at Pregnancy Resource Centers on an annual basis. Pregnancy Resource Centers save taxpayers countless millions of dollars each year, again because many of the services that they provide for free—through the work of volunteers and the support of donors—would otherwise have to be provided by government agencies through publicly funded programs.[16]

---

[11] Statement by AG Garland, *supra* note 7.
[12] Petition for Writ of Certiorari, *Livingwell Med. Clinic, Inc. v. Becerra*, 138 S. Ct. 2701 (2018), 4, available at http://media.aclj.org/pdf/Living-Well-Petition-Final-w_o-App_Redacted.pdf.
[13] *Id.* at 6.
[14] *Fact Sheet: Pregnancy Centers – Serving Women and Saving Lives (2020 Study)*, CHARLOTTE LOZIER INSTITUTE (July 2021), https://s27589.pcdn.co/wp-content/uploads/2021/07/2020-Pregnancy-Centers-Fact-Sheet_FINAL-7.23.24-pdf.
[15] *Id.*
[16] *Id.*

Pregnancy Resource Centers provide invaluable information and resources that help ensure that a woman is fully aware of all the facts and options available to her – to help inform her decision and truly give her *choices*; including the fact that abortion is intended to permanently end the life of an unborn child, an act that is extremely grave, gruesome, and irreversible. Thus, a woman's decision should be fully informed, and should be made only after careful consideration of all the facts. One option does not constitute choice, and, therefore, Pregnancy Resource Centers play a vital role in providing the alternatives to the only option pushed by abortion clinics.

Moreover, Pregnancy Resource Centers provide material assistance and support beyond merely consultation or medical services. As such, we respectfully request that Pregnancy Resource Centers, their healthcare workers and patients be provided the same vigilant protection that the Department of Justice is dedicated to providing abortion clinics and those women seeking abortion in the weeks and months ahead.

IV. POTENTIAL TARGETING OF PREGNANCY RESOURCE CENTERS FOR CENSORSHIP AND ELIMINATION

Second, the ACLJ finds the language of the Executive Order directing action to be taken regarding "deceptive or fraudulent practices" of great concern not only because of current and extremely charged political rhetoric regarding Pregnancy Resource Centers, but because of the history pro-abortion governments have of government overreach that has resulted in the abridgement of the constitutional rights of Pregnancy Resource Centers.

On June 17, 2022, pro-abortion members of Congress sent a letter to the Chief Executive Officer of Google. In that letter the Members of Congress referred to "crisis pregnancy centers," or "pregnancy resource centers." as "fake clinics."[17] The letter goes on to call on Google to, *inter alia*, "limit the appearance of '. . . fake clinics or so-called 'crisis pregnancy centers' in Google search results, Google Ads, and on Google Maps . . . ."[18] The Office of Letitia James, Attorney General of the State of New York, wrote a similar letter to General Counsel for Google, stating:

> [O]rganizations known as "crisis pregnancy centers" (CPCs) are not health care providers . . . . **CPCs exist solely to intercept and dissuade pregnant people from making fully informed decisions about their healthcare** such as the choice to obtain an abortion. Including these organizations in a list for an individual seeking abortion services is dangerous and misleading. . . . For example, a Google Maps search for "abortion Binghamton, NY" *lists several crisis pregnancy centers such as Life Choices Center and Women's Life Services along with legitimate health*

[17] Letter from Members of Congress to Sundar Pichai, Chief Executive Officer of Google (June 17, 2022), *available at* https://www.warner.senate.gov/public/_cache/files/5/6/5698c724-cc0d-42f6-bbb6-b05e472b4564/26F26BB28841042A7931EEC58AC80E08.anti-abortion-letter-to-google-final.pdf.
[18] *Id.*

> *care* providers who offer abortion and abortion counseling . . . it is imperative that pregnant people are receiving accurate information and are able to obtain *the medical services they need* efficiently and with minimal confusion.[19]

Recently, Senator Elizabeth Warren has made a series of remarks regarding Pregnancy Resource Centers: "We need to shut them down here in Massachusetts, and we need to shut them down all around the country."[20] She also accused Pregnancy Resource Centers of "[d]eceiving people in order to provide services," "[springing] up to prey on people who are pregnant and vulnerable and seek[ing] help . . . ,"[21] accused Pregnancy Resource Centers of "wishing [women] harm,"[22] and stated "[they] should not be able to torture a pregnant person like that."[23]

These disparaging remarks regarding Pregnancy Resource Centers are not only incorrect, but blatantly so. As we detailed above, Pregnancy Resource Centers provide *legitimate* and invaluable healthcare in addition to counseling and material support to women, babies, and families. However, these remarks are far from extraordinary, as we have seen Pregnancy Resource Centers targeted unconstitutionally in, among other places, states like California and New York.

In California, ACLJ sued on behalf of three Pregnancy Resource Centers challenging the California Reproductive FACT Act. *LivingWell Med. Clinic v. Becerra*, 138 S. Ct. 2701 (2018), *cert. granted* (vacating and remanding *LivingWell Med. Clinic v. Harris*, 669 F. App'x 493 (9th Cir. 2016)). The FACT Act attempted to force our clients to tell every one of their visitors, no matter the reason for their visit, that California provides free or low-cost abortions to eligible women. The Act not only attempted to force the centers to advertise the State's abortion subsidy program, it required that the centers provide a telephone number that women could call to see if they were eligible for a free abortion.

In *Nat'l Inst. of Family & Life Advocates v. Becerra*, the Supreme Court reversed a decision by the U.S. Court of Appeals for the Ninth Circuit, concluding that the Pregnancy Resource Centers challenging the Act were likely to succeed on the merits of their claim that the California Reproductive Fact Act violated the First Amendment. Ultimately, a federal court in Oakland,

---

[19] Letter from Darsana Srinivasan, Chief, Health Care Bureau, Office of the Attorney General, State of New York, to Hamilmah DeLaine Prado, General Counsel, Google (June 28, 2022), *available at* https://ag.ny.gov/sites/default/files/2022.06.28_letter_to_google_re_cpcs.pdf (emphasis added).
[20] Greg Price (@greg_price11), TWITTER (July 12, 2022, 4:41 PM), https://twitter.com/greg_price11/status/1546957961439969280.
[21] Kate Selig, *Elizabeth Warren Calls for Action Against 'Crisis Pregnancy Centers' in Wake of Supreme Court Overturning* Roe (June 29, 2022), https://www.msn.com/en-us/news/politics/elizabeth-warren-calls-for-action-against-crisis-pregnancy-centers-in-wake-of-supreme-court-overturning-roe/ar-AAZ0wK6.
[22] RNC Research (@RNCResearch), TWITTER (July 6, 2022, 11:39 AM), https://twitter.com/RNCResearch/status/1544707511906930690?s=20&t=iumDjtgeoBXVKChVIo2Zjg.
[23] Isabel Brown, *Senator Elizabeth Warren Calls for Crisis Pregnancy Centers to be Shut Down*, TURNING POINT USA, https://www.tpusa.com/live/senator-elizabeth-warren-calls-for-crisis-pregnancy-centers-to-be-shut-down (last visited July 21, 2022).

California permanently blocked the State of California from violating the rights of Pregnancy Resource Centers as guaranteed under the First Amendment of the Constitution:

> It is hereby ORDERED that Defendant Xavier Becerra, in his official capacity as the Attorney General of California, shall be permanently enjoined from enforcing the Reproductive FACT Act, California Health and Safety Code section 123470, et seq. ("the Act").
>
> It is further ORDERED that judgment is entered in favor of Plaintiffs and against Defendant on Plaintiffs' claim under the free speech clause of the First Amendment.[24]

In New York, the ACLJ successfully sued on behalf of two organizations that run Pregnancy Resource Centers in New York City. *Evergreen Ass'n. v. City of New York*, 740 F. 3d 233 (2d Cir. 2014). In that case, the Second Circuit considered New York City's misguided attempt to regulate the centers on the same pretext as that appearing in the current Executive Order, i.e, trumped up, politically motivated charges of "deceptive practices." The Court held that by requiring Pregnancy Resource Centers to disclose at the beginning of contact with potential clients whether they provided referrals for abortion, emergency contraception, or prenatal care and to disclose that the New York City Department of Health and Mental Hygiene encouraged pregnant women to consult with a licensed provider was overly burdensome in violation of the First Amendment.

V. CONCLUSION

The ACLJ greatly values and appreciates the important role of Pregnancy Resource Centers in providing healthcare, counseling, and material resources and support, among other things, to women, babies, and families across the United States. Not only is this work vitally important, it is protected under the law, as we have succeeded in establishing in litigation on more than one occasion.

Because of the ACLJ's concern that President Biden's Executive Order may be interpreted in a way that could lead to government overreach and an unconstitutional targeting of Pregnancy Resource Centers, we will be closely monitoring the reports, recommendations, and strategies that the you, the Attorney General, and the Department of Justice's Reproductive Rights Task Force develop and implement in fulfillment of the Executive Order. The ACLJ will also be prepared to immediately challenge in court any guidance, order, or other form of regulation, that the

[24] Ord. Regarding Permanent Injunction, Livingwell Med. Clinic, Inc. v. Becerra, Nov. 26, 2018, 4:18-cv-04939-JSW, http://media.aclj.org/pdf/LivingWell-Court-Order.pdf.

Department of Justice, or any other administrative department, promulgates that constitutes an abridgement of the rights of Pregnancy Resource Centers.

Sincerely,

Jordan Sekulow
Executive Director
American Center for Law & Justice

CeCe Heil
Senior Counsel
American Center for Law & Justice

Olivia F. Summers
Associate Counsel for Public Policy
American Center for Law & Justice

EXHIBIT 002

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Felte, James (CRT)" <[redacted]>
Cc: "Fitzgerald, Paige (CRT)" <[redacted]>
Subject: RE: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022
Date: Wed, 17 Aug 2022 17:05:47 -0400
Importance: Normal

I've never heard of them.
I'll get some research done and reach out to them.
SP

From: Felte, James (CRT) <[redacted]>
Sent: Wednesday, August 17, 2022 4:58 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Fitzgerald, Paige (CRT) <[redacted]>
Subject: RE: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022

I was not aware of them and I'm assuming that we haven't reached out to them, correct?

From: Felte, James (CRT) <>
Sent: Wednesday, August 17, 2022 4:57 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Fitzgerald, Paige (CRT) <[redacted]>
Subject: FW: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022

Sanjay,

Feel free to reach out to Gamondi for any intern help you need on this.

Thanks,

Jim

From: Moossy, Robert (CRT) <[redacted]>
Sent: Wednesday, August 17, 2022 4:54 PM
To: Felte, James (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Subject: RE: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022

A quick google search found this, have we reached out to them? Maybe an intern could do some on-line searching? I'd very much like to get this TF meeting done by early September.

About (care-net.org)
"Founded in 1975, Care Net is a 501(c)3 nonprofit organization that supports one of the largest networks of pregnancy centers in North America and runs the nation's only real-time call center providing pregnancy decision coaching."
Since 2008, Care Net has put our mission and vision into practice and saved more than 823,000 babies from abortion by:

- **Supporting one of the largest networks of pregnancy centers in North America.** With more than 1,100 affiliates and 30,000 volunteers, we provide immediate support to women and men considering abortion so they can choose life. Last year alone, our pregnancy centers provided clients with more than $62 million in free services.

From: Felte, James (CRT)
Sent: Wednesday, August 17, 2022 11:16 AM
To: Moossy, Robert (CRT) <[redacted]>
Subject: FW: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022

From Sanjay below

From: Patel, Sanjay (CRT)m[redacted]
Sent: Wednesday, August 17, 2022 10:14 AM
To: Felte, James (CRT)m[redacted]
Cc: Fitzgerald, Paige (CRT) <[redacted]>
Subject: RE: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022

FBI is communicating with the Conference of Bishops to set up a call.
(The Bishops would not respond timely to calls and emails from me).

I discussed with FBI the urgency of scheduling the call during our last TF meeting (Aug 5) and I've followed up with FBI twice since then.
Nothing on the books yet, but hope to have an answer from FBI before the end of this week.

From: Felte, James (CRT)m[redacted]
Sent: Wednesday, August 17, 2022 10:08 AM
To: Patel, Sanjay (CRT)m[redacted]
Cc: Fitzgerald, Paige (CRT) <[redacted]>
Subject: FW: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022

You Sanjay,

I know Robert's question pertains to one of the items on which you plan to brief the AAG. From the draft game plan agenda you sent yesterday, I know the date for such a meeting with pro-life groups has not yet been scheduled. Do you have an idea as to roughly when such a meeting may take place?

Thanks,

Jim

From: Moossy, Robert (CRT) <[redacted]>
Sent: Tuesday, August 16, 2022 4:33 PM
To: Patel, Sanjay (CRT)m[redacted]; Felte, James (CRT)m[redacted]; Fitzgerald, Paige (CRT) <[redacted]>; Rosenbaum, Steven (CRT) <[redacted]>; Cowall, Laura (CRT) [redacted]
Subject: FW: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022

Please see attached letter. Where are we on the FACE TF meeting for pro-life clinics?

From: Weiner, Robert (CRT)
Sent: Tuesday, August 16, 2022 4:30 PM
To: Moossy, Robert (CRT) <[redacted]>
Subject: FW: ECATS[redacted] Letter from Jordan Sekulow dtd 8/8/2022

Of interest

From: Morse, Jodie (OASG) <[redacted]>
Sent: Tuesday, August 16, 2022 4:21 PM
To: Sooknanan, Sparkle (OASG) <[redacted]>; Bond, Rebecca (CRT) [redacted];
Weiner, Robert (CRT) <[redacted]>
Subject: FW: ECATS[redacted] Letter from Jordan Sekulow dtd 8/8/2022

Please see attached.

From: Maltby, Jeremy (ODAG) <[redacted]>
Sent: Tuesday, August 16, 2022 12:21 PM
To: Morse, Jodie (OASG) <[redacted]>
Subject: Fwd: ECATS[redacted] Letter from Jordan Sekulow dtd 8/8/2022

This is the letter that I mentioned

Sent from my iPhone

Begin forwarded message:

From: "Thomas, Tina M. (ODAG)" <[redacted]>
Date: August 15, 2022 at 10:59:56 PM GMT+2
To: ODAG INFO COPIES <[redacted]>, "Braden, Myesha (ODAG)" <[redacted]>
Cc: "Chandler, Adam (ODAG)" <[redacted]>, "Maltby, Jeremy (ODAG)" <[redacted]>
Subject: RE: ECATS[redacted] Letter from Jordan Sekulow dtd 8/8/2022

+ Jeremy

Tina M. Thomas

Deputy Chief of Staff and Counsel
Office of the Deputy Attorney General
U.S. Department of Justice
(o)[redacted] | (m)[redacted]

From: ODAG INFO COPIES <[redacted]>
Sent: Monday, August 15, 2022 4:53 PM
To: Braden, Myesha (ODAG) <[redacted]>
Cc: Thomas, Tina M. (ODAG) <[redacted]>; Chandler, Adam (ODAG) <[redacted]>
Subject: FW: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022

From: Nickens, Rayna (JMD) <[redacted]>>

Sent: Friday, August 12, 2022 4:42 PM
To: InfoCopies <[redacted]>; ODAG INFO COPIES
<[redacted]<mailto:[redacted]>>
Subject: ECATS-[redacted] Letter from Jordan Sekulow dtd 8/8/2022

Please see attached documents for info.

Thank you.

Rayna Nickens
Correspondence Management Analyst
Correspondence and Communications Control Team
Departmental Executive Secretariat
[redacted]
[redacted]>

EXHIBIT 003

From: Vincent DiCaro <[redacted]@care-net.org>
To: "Patel, Sanjay (CRT)" <[redacted]>
Cc: Roland Warren <[redacted]@care-net.org>, Erin Forsythe <[redacted]@care-net.org>, Christine Quann <[redacted]@care-net.org>
Subject: Re: [EXTERNAL] Fwd: Outreach meeting request
Date: Fri, 09 Sep 2022 15:11:53 -0400
Importance: Normal

Hello Sanjay,

The best person to contact at Heartbeat is Jor-El Godsey, their president, at[redacted]@heartbeatinternational.org.

The contact at NIFLA is their president, Tom Glessner at[redacted]@nifla.org.

We do not have a good contact at Birthright.

Vince

Vincent DiCaro
Chief Outreach Officer
[redacted]
V: [redacted] F: [redacted]
E: [redacted]@care-net.org W: care-net.org

On Thu, Sep 8, 2022 at 3:19 PM Patel, Sanjay (CRT) <[redacted]> wrote:

> Good afternoon Care Net team –
>
> I want to thank you for your time last week.
>
> I really appreciate you for connecting with me, and for assisting with my Task Force's outreach efforts.
>
> I will circle back with you soon about attending an upcoming Task Force meeting, and about the FACE Act training/information session you requested for your affiliates.
>
> In the meanwhile, can you share with me the contacts for the other organizations like yours with whom I can similarly connect with about outreach?
>
> I remember Vince mentioned BirthRight and Heartbeat as examples?
> Thanks again!
>
> Sanjay
>
> **From:** Roland Warren <[redacted]@care-net.org>
> **Sent:** Friday, August 19, 2022 4:46 PM
> **To:** Patel, Sanjay (CRT) <[redacted]>

Cc: Vince DiCaro <[redacted]@care-net.org>; Erin Forsythe <[redacted]@care-net.org>; Christine Quann <[redacted]@care-net.org>
Subject: [EXTERNAL] Fwd: Outreach meeting request

Mr. Patel,

Thank you for contacting Care Net. We would be very interested in having a conversation with you about the violence and threats to Care Net and its affiliated pregnancy centers. Please advise re next steps.

Best regards,

Roland

Roland C. Warren

President & CEO

[redacted]

[redacted]

V: [redacted] F: [redacted]

E: [redacted]@care-net.org W: care-net.org

---------- Forwarded message ---------
From: **Patel, Sanjay (CRT)** <[redacted]>
Date: Wed, Aug 17, 2022 at 6:05 PM
Subject: Outreach meeting request
To: [redacted]@care-net.org <[redacted]@care-net.org>
CC: Taskforce, Clinicviolence (CRT) <[redacted]>

Dear Care Net personnel–

I would like to schedule a meeting with a manager from your organization to explore outreach efforts by the U.S. Department of Justice with pregnancy centers that are being targeted by incidents of crime.

All reproductive health care providers, patients, and facilities are protected by federal laws, including the FACE Act (18 USC 248), from violence, threats, obstruction, and damage.

Please contact me by email or phone to further discuss.

I look forward to hearing back from a Care Net official.

Regards,

Sanjay Patel

Sanjay Patel

Director

National Task Force on Violence Against Reproductive Health Care Providers

Criminal Section

Civil Rights Division

U.S. Department of Justice

Washington, D.C.

[redacted]

--

Care Net Team

EXHIBIT 004

Event: Monthly Clinic Violence Task Force meeting

Start Date: 2022-10-07 11:00:00 -0400

End Date: 2022-10-07 12:00:00 -0400

Organizer: Patel, Sanjay (CRT) <[redacted]>

Location: SWITCHING TO ZOOM

Class: X-PERSONAL

Date Created: 2024-11-07 09:09:49 -0500

Date Modified: 2024-10-07 09:09:49 -0500

Priority: 5

DTSTAMP: 2022-10-07 07:10:54 -0400

Attendee: Cowall, Laura (CRT) <[redacted]>; Klugman, Maura (CRT) <[redacted]>; Smith, Katelyn (CRT) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>; [redacted] (CTD) (FBI) <[redacted]>; [redacted] (CTD) (FBI) <[redacted]>; [redacted] (CTD) (FBI) <[redacted]>; [redacted] (OPE) (FBI) <[redacted]>; [redacted] (CTD) (FBI) <[redacted]>; Wester, John E. <[redacted]>; [redacted] <[redacted]>; Jablonski, Daniel (USMS) <[redacted]>; Brandt, Robert (USMS) <[redacted]>; Taskforce, Clinicviolence (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Felte, James (CRT) <[redacted]>; Clarke, Kristen (CRT) <[redacted]>; Cheung-Smith, Bridget (CRT) <[redacted]>; [redacted] (WF) (FBI) <[redacted]>; Meeks, Taryn (NSD) <[redacted]>; Moossy, Robert (CRT) <[redacted]>; Weiner, Robert (CRT) <[redacted]>

Attach: TF_meeting0agenda_10-7-22.docx

Alarm: Display the following message 15m before start

| Reminder

Good morning TF members,
Agenda attached for our 11am this morning.
Thanks,
Sanjah

TF membersi–
Similar to our outreach efforts to the abortion provider community following the SCt's Dobbs decision, I have invited officials from three pro-life NGOs to attend our meeting Oct 7.

Many pro-life pregnancy centers across the country have been targeted by pro-abortion extremists, including the Jane's Revenge movement.
I'd like to let these stakeholders know that their clinics are also protected by federal law from violence/threats/obstruction.
The organizations I have invited include: Care Net, Nat'l Institute of Family and Life Advocates (NIFLA), and Heartbeat International.
These three NGOs likely represent approx. 85% of all life-affirming providers.
I'm switching our meeting from Teams to Zoom (see below).
I will send around an agenda next week, and may call upon some of you to speak (I'll let you know in advance).
Thanks,
SP

Sanjay Patel (USDOJ) is inviting you to a scheduled ZoomGov meeting.

Topic: Clinic Violence Task Force meeting
Time: Oct 7, 2022 11:00 AM Eastern Time (US and Canada)

Join ZoomGov Meeting
[redacted]

Meeting ID: [redacted]
One tap mobile
[redacted] (San Jose)
[redacted] (New York)

Dial by your location
[redacted] (San Jose)
[redacted] (New York)
[redacted] (San Jose)
[redacted]
Meeting ID: [redacted]
Find your local number: [redacted]

Join by SIP
[redacted]

Join by H.323
[redacted] (US West)
[redacted] (US East)
Meeting ID: [redacted]

Task Force members -
We are due for a monthly meeting.
Please forward this invitation to other necessary attendees from your components.
I will circulate an agenda early in the week prior to the meeting.
Please let me know if you have anything that needs to be added.
Thank you,
Sanjay

Microsoft Teams meeting

Join on your computer or mobile app

[redacted]

Or call in (audio only)

[redacted] United States,

Phone Conference ID: [redacted]

Find a local number | Reset PIN

Learn More | Meeting options

EXHIBIT 005

AAG talkers for Clinic Violence TF meeting with pro-life NGOs (10/7/22)

- Thank you for being here today. You all are providing important work, and I am grateful that you made time to join today's meeting
- We convened the call to describe to this group of leaders and advocates the Department's authority to enforce the Freedom of Access to Clinic Entrances Act ("FACE Act"). The FACE Act makes it a crime and a civil law violation to injure, intimidate, or interfere with a person seeking to obtain or provide reproductive health services. The FACE act empowers the Justice Department to prosecute criminal violations of the ACT, and allows private parties, the State Attorney Generals and the Justice Department to bring civil suits under the Act for injunctive relief, damages, and penalties.
- Reproductive health services covered under the Act includes providers of life-affirming care. The FACE Act protects your patients, providers and facilities (such as the thousands of pregnancy centers across the country) from violence and obstruction.
- Violence, threats of violence, physical obstruction, or property damage in violation of the FACE Act will not be tolerated by this Administration. We are committed to ensuring that the rights of our nation's reproductive health care providers are fully enforced and protected.
- My hope is that you all can carry this reminder back to your colleagues and community partners. We encourage you to reach out to your clinics and health centers around the country to reassure them of our support. During this call we will provide you with resources that you can use to educate your providers and clinics about the FACE Act. [Can we share the FACE resource book, any downside?]
- The Civil Rights Division stands ready to enforce the FACE Act, through criminal and civil remedies. We do this work in close partnership with officers of the United States Attorney's Offices and the FBI in Districts around the country. Additional federal law enforcement partners including ATF, USMS, and USPIS [spell out].
- Criminal FACE penalties include imprisonment and fines. The severity of the punishment depends upon the nature of the offense and whether or not a person is a repeat offender. The Justice Department stands ready to prosecute anyone who is found to have criminally targeted a pregnancy center because of the life affirming care provided.
- On the civil side, the Department has filed multiple FACE actions in more than a dozen states, and there are on-going investigations in other states. The Justice Department has obtained injunctive relief and restraining orders under the FACE Act, and is actively investigating incidents at several life affirming care centers, including incidents where the phrase "Jane's Revenge" was graffitied on clinic walls.
- Reporting a potential FACE Act violation is critically important to the Department's ability to hold offenders accountable. To report an offense targeting any of your affiliates, please let them know to notify their local FBI or USAO. This Task Force can assist you with identifying who/where your affiliates should report incidents to. You will learn more about that today.
- Additionally, you can reach out to Sanjay, with whom I know your organizations have been in contact with.
- Before I close, I welcome the opportunity to hear from you – the reports of what you are seeing on the ground, ideas for ways the Department can identify new cases, your recommendations for how we can amplify the federal government's coordination on these issues, and more. I cannot promise that we will be able to undertake every action you suggest, but I can assure you that we will listen and do our best to act swiftly and appropriately. Thank you in advance for your candor and your time.

Commented [MR(1]: Kristen, this is the work the groups use. Query whether we just say ""includes all reproductive health services clinics, including those that you represent." Moossy, Robert (CRT) 2022-10-04 12:09:00

EXHIBIT 006

TPs re: CRT's (CRM) pro-life FACE work (as of 9-14-22)

- TPs (public):
  - The Department of Justice enforces the Freedom of Access to Clinic Entrances (FACE) Act, which prohibits anyone from obstructing access to reproductive health services through violence, threats of violence, or property damage.
  - Despite the Supreme Court's decision in *Dobbs v. Jackson Women's Health Organization*, which eliminated the Constitutional right to abortions, the FACE Act continues to protect reproductive health rights. Under *Dobbs*, the Supreme Court allowed states to regulate abortion care and pregnancy termination services. The *Dobbs* decision does not affect the Department's enforcement obligations under the FACE Act to protect reproductive healthcare providers, patients, and facilities across the country, including in those states where abortion care remains legal.
  - The FACE Act is not about abortions. It protects persons seeking or providing any type of reproductive health care, including infertility treatment, prenatal care, breast cancer screening, pregnancy counseling services, vasectomies, and abortion services. Therefore, the FACE Act is content neutral because it protects facilities providing life affirming care through termination services.

- Historical Prosecutions (public):
  - Historically, incidents targeting pro-life or life affirming pregnancy centers have rarely occurred, and even fewer have been reported to federal law enforcement authorities.
  - Nevertheless, one case has been prosecuted by DOJ under FACE re: attack against a pro-life pregnancy center
    - *U.S. v. Mathison* (EDWA 95-cr-085)
      - Δ indicted for making series of threatening calls to pro-life counseling centers.
      - Δ threatened he had a gun and would kill office workers.
      - Δ charged with FACE Act and § 875 violations
      - Δ PG to FACE Act offense and sentenced to 5 yrs probation with 30 days home detention
      - Case cited in published 2d opinion *U.S. v. Weslin*, 156 F.3d 292, 296–97 (2d Cir. 1998)
        - Thus, "pro-choice" protestors as well as "pro-life" protestors come within the terms of the statute. It applies to those who would ***297** interfere with the provision of counseling at a clinic in which patients are encouraged not to have abortions. Not only are such persons subject to prosecution in theory, but at least one pro-choice activist has, in fact, been prosecuted for violating FACE. *See United States v. Mathison*, CR–95–085–FVS (E.D.Wa.1995) (defendant prosecuted for threatening workers at pro-life facilities).

- More TPs (public):
  - DOJ will investigate all incidents of force, threats of force, obstruction, and property damage that interferes with reproductive health care.
  - DOJ will enforce the FACE Act where appropriate, regardless of viewpoint.
  - DOJ is aware of the uptick nation-wide in potentially criminal incidents targeting life affirming pregnancy centers following the SCt's *Dobbs* decision.
  - These incidents have largely involved incidents of vandalism and property damage targeting facilities.
    - Examples of the vandalism include spray painted messages such as:
      - "if abortions aren't safe, then you aren't either"
      - "forced birth is murder"
      - "pro birth does not equal pro life"
      - "not a clinic" or "fake clinic"
      - "Jane's Revenge"
    - Examples of damage include:
      - Broken windows
      - Fire damage
      - Red paint left on building doors/walls/windows
    - Incidents have occurred nation-wide
    - First reported incident was early May 2022
  - Generally, these incidents are attributed to a group calling itself "Jane's Revenge" (the group's name is believed to be a reference to the 1970's era Jane Collective, an underground service that provided abortions when it was illegal prior to *Roe v. Wade*)
  - Federal authorities are investigating all reported incidents, and working to identify subjects.
  - DOJ will take appropriate action at the conclusion of these on-going investigations, which may include prosecution under the FACE Act.

- Current Enforcement Efforts (LE sensitive):
  - [redacted] on-going nation-wide investigations of damage/vandalism/arsons of pro-life pregnancy centers (predominantly "Jane's Revenge" attacks (i.e. "If abortions aren't safe then neither are you"))
  - Incidents are being jointly investigated by [redacted]

- Outreach (public):
  - DOJ has made outreach efforts to life affirming and pregnancy centers through several national parent organizations, including:
    - Clinic Violence TF has contacted officials from national organizations
    - FBI FOs identifying and contacting pregnancy centers throughout country

- Statements (public):
  - DOJ Journal FACE Act article (https://www.justice.gov/usao/page/file/1492851/download)
  - Clinic Violence Task Force website (https://www.justice.gov/crt/protecting-patients-and-health-care-providers)
  - TF resource booklet for reproductive health care providers (https://www.justice.gov/crt/security-recommendations-enhance-safety-and-protection-providers)

EXHIBIT 007

From: "Patel, Sanjay (CRT)" [redacted]
To: "Bradford, Aryele (PAO)" [redacted], "Felte, James (CRT)" [redacted], "Fitzgerald, Paige (CRT)" [redacted]
Cc: "Moossy, Robert (CRT)" [redacted], "Weiner, Robert (CRT)" [redacted]
Subject: RE: FACE Stats
Date: Thu, 22 Jun 2023 13:29:40 -0400
Importance: Normal

Sure – The task force met separately with Care-Net, Heartbeat International, NIFLA, and USCCB. Then we had a larger meeting with all the NGOs (CareNet, Heartbeat, and NIFLA) and have occasionally had calls with them separately as issues/incidents arose. The lines of communication are open with them, and we have offered to meet with the providers they represent if they so desired. No response on that offer since it was made.

We also updated our resource booklet after meeting with them and soliciting feedback.

From: Bradford, Aryele (PAO) [redacted]
Sent: Thursday, June 22, 2023 1:17 PM
To: Felte, James (CRT) [redacted]; Patel, Sanjay (CRT) [redacted]; Fitzgerald, Paige (CRT) [redacted]
Cc: Moossy, Robert (CRT) [redacted]; Weiner, Robert (CRT) [redacted]
Subject: RE: FACE Stats

+ Weiner.

Does anyone have the most recent information about our engagement with pro-life/crisis providers? I recall a meeting or two, but any relevant information you can pass my way that we can share on background with a reporter?

From: Bradford, Aryele (PAO)
Sent: Wednesday, June 21, 2023 3:34 PM
To: Felte, James (CRT) [redacted]; Patel, Sanjay (CRT) [redacted]; Fitzgerald, Paige (CRT) [redacted]
Cc: Moossy, Robert (CRT) [redacted]
Subject: RE: FACE Stats

Thank you!

From: Felte, James (CRT) [redacted]
Sent: Wednesday, June 21, 2023 3:28 PM
To: Patel, Sanjay (CRT) [redacted]; Bradford, Aryele (PAO) [redacted]; Fitzgerald, Paige (CRT) [redacted]
Cc: Moossy, Robert (CRT) [redacted]
Subject: RE: FACE Stats

Thanks Sanjay.

From: Patel, Sanjay (CRT) [redacted]
Sent: Wednesday, June 21, 2023 3:23 PM

To: Felte, James (CRT) <[redacted]>; Bradford, Aryele (PAO) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Cc: Moossy, Robert (CRT) <[redacted]>
Subject: RE: FACE Stats

Yes, those numbers are accurate.
Only one of those cases involve facilities that are crisis pregnancy centers (1 charged case (US v. Freestone)e- 4 defendants).
The other charged cases are all abortion providers.
Yes, you can share the link to the website. It was recently updated.
SP

From: Felte, James (CRT) <[redacted]>
Sent: Wednesday, June 21, 2023 3:21 PM
To: Bradford, Aryele (PAO) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Cc: Moossy, Robert (CRT) <[redacted]>
Subject: RE: FACE Stats

Aryele,

The below stats are accurate. Sanjay can correct me if I'm wrong, but the only case to date to charge interference with "anti-abortion" facilities, often referred to as pregnancy resource centers, is the case U.S. v. Freestone, et al., which is described in the first bullet point in the link you provided. As far as sharing the page in the link, I believe the link is public (?) so I have no issue sharing it.

Jim

From: Bradford, Aryele (PAO) <[redacted]>
Sent: Wednesday, June 21, 2023 2:56 PM
To: Patel, Sanjay (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Felte, James (CRT) <[redacted]>
Cc: Moossy, Robert (CRT) <[redacted]>
Subject: FACE Stats

Hi all – I'm checking in to see if the stat below is still accurate? Also, is there a way to determine if any of these prosecutions are related to violence targeting institutions that both support and oppose abortion access? Finally, is it okay to share this page with reporters as it seems to have been updated at the end of May?
https://www.justice.gov/crt/recent-cases-violence-against-reproductive-health-care-providers

- Since Jan 2021, the Department has charged 18 cases involving a total of 48 defendants with FACE Act-related violations.

Aryele N. Bradford
Spokeswoman | Office of Public Affairs
Department of Justice
[redacted]
d:
c:

EXHIBIT 008

From: ASG19 Schedule <[redacted]>

To: "Mody, Saeed (OASG)" <[redacted]>, "Morse, Jodie (OASG)" <[redacted]>, "[redacted]@latinainstitute.org" <[redacted]@latinainstitute.org>, "[redacted]@napawf.org" <[redacted]@napawf.org>, "[redacted]@empoweredpi.com" <[redacted]@empoweredpi.com>, "[redacted]@urge.org" <[redacted]@urge.org>, "[redacted]@birthequity.org" <[redacted]@birthequity.org>, "[redacted]@urge.org" <[redacted]@urge.org>, "[redacted]@blackrj.org" <[redacted]@blackrj.org>, "[redacted]@newvoicesrj.org" <[redacted]@newvoicesrj.org>, "[redacted]@napawf.org" <[redacted]@napawf.org>, "[redacted]@empoweredpi.org" <[redacted]@empoweredpi.org>, "[redacted]@tewawomenunited.org" <[redacted]@tewawomenunited.org>, "[redacted]@urge.org" <[redacted]@urge.org>, "[redacted]@gmail.com" <[redacted]@gmail.com>, "[redacted]@clrj.org" <[redacted]@clrj.org>, "[redacted]@clrj.org" <[redacted]@clrj.org>, "[redacted]@niwrc.org" <[redacted]@niwrc.org>, "[redacted]@bwhi.org" <[redacted]@bwhi.org>, "[redacted]@dayahouston.org" <[redacted]@dayahouston.org>, "[redacted]@apnaghar.org" <[redacted]@apnaghar.org>, "[redacted]@blueprintny.org" <[redacted]@blueprintny.org>, "[redacted]@blueprintny.org" <[redacted]@blueprintny.org>, "[redacted]@theafiyacenter.org" <[redacted]@theafiyacenter.org>, "[redacted]@heartwomenandgirls.org" <[redacted]@heartwomenandgirls.org>, "[redacted]@kanwin.org" <[redacted]@kanwin.org>, "[redacted]@ppfa.org" <[redacted]@ppfa.org>, "[redacted]@latinainstitute.org" <[redacted]@latinainstitute.org>, "[redacted]@sistersong.net" <[redacted]@sistersong.net>, "[redacted]@blackrj.org" <[redacted]@blackrj.org>

Cc: "Henthorne, Betsy (OASG)" <[redacted]>, "Colangelo, Matthew (OASG)" <[redacted]>, "Inman, Susan (ATJ)" <[redacted]>, "Lopez, Kimberly (ATJ)" <[redacted]>, "Sooknanan, Sparkle (OASG)" <[redacted]>, "Bond, Rebecca (CRT)" <[redacted]>, "Weiner, Robert (CRT)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>, "Kossak, Amy D (CIV)" <[redacted]>, "[redacted]@empoweredpi.com" <[redacted]@empoweredpi.com>

Subject: Meeting with Reproductive Justice Groups

Date: Mon, 26 Sep 2022 16:09:19 -0400

Importance: Normal

Attachments: unnamed

Note: This meeting is limited to the invited attendees only. You are not authorized to forward this invitation. If you believe other individuals should be included, please contact Tracy Washington @[redacted]

Note: THIS IS A CLOSED PRESS AND OFF-THE-RECORD MEETING.

****Attendees on this email who RSVP'd to come in-person, you will receive an email with the logistics for location and building access.****

– Do not delete or change any of the following text –

When it's time, join your Webex meeting here.

Join meeting

More ways to join:

Join from the meeting link

[redacted]

Join by meeting number

Meeting number (access code): [redacted]

Meeting password: [redacted]

Tap to join from a mobile device (attendees only)

[redacted] United States Toll (Washington D.C.)

Join by phone

[redacted] United States Toll (Washington D.C.)

[redacted]

Join from a video system or application

Dial [redacted]

Join using Microsoft Lync or Microsoft Skype for Business

Dial [redacted]

If you are a host, [redacted] to view host information.

Need help? Go to [redacted]

EXHIBIT 009

From: "Moossy, Robert (CRT)" <[redacted]>
To: "Felte, James (CRT)" <[redacted]>
Cc: "Fitzgerald, Paige (CRT)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>, "Weiner, Robert (CRT)" <[redacted]>
Subject: Re: Outreach to USCCB
Date: Fri, 07 Oct 2022 16:35:28 -0400
Importance: Normal

Good for Sanjay to handle, she will not join.

Sent from my iPhone

On Oct 7, 2022, at 3:22 PM, Felte, James (CRT) <[redacted]> wrote:

Robert,

See below. It appears that the only person from the USCCB for Tuesday will be their General Counsel. Does Kristen still want to make opening remarks? It seems like this could be more of a conversation that Sanjay and a smaller group has?

Thanks,

Jim

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Friday, October 7, 2022 1:34 PM
To: Felte, James (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Subject: FW: Outreach to USCCB

Jim/Paigee-
See below re: next week's bishops meeting.
SP

From: [redacted] <[redacted]>
Sent: Friday, October 7, 2022 1:24 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>
Subject: RE: Outreach to USCCB

Sanjay,

Our Office of Partner Engagement just informed me that for the call with USCCB, the only person that will be in attendance is the General Counsel – so one person. Come to find out they purposely did this, to eliminate scheduling issues.

With that being said, do you still want to have the call? And do you still want the AAG to make opening remarks?

Thank you,

[redacted]
Unit Chief
CTD/DTOS/Northeast
[redacted] (Cell)
[redacted] (Desk)

From: Patel, Sanjay (CRT) [redacted]
Sent: Thursday, October 6, 2022 1:50 PM
To: [redacted] (CTD) (FBI) [redacted]
Subject: [EXTERNAL EMAIL] - RE: Outreach to USCCB

Yes, it's AAG Clarke.
I'll find out and let you know.
Thanks!
SP

From: [redacted]
Sent: Thursday, October 6, 2022 1:49 PM
To: Patel, Sanjay (CRT) [redacted]
Subject: RE: Outreach to USCCB

Of course. How long would the AAG need? And is this AAG Kristin Clarke? (I hope I got the name correct).

thanks!

[redacted]
Unit Chief
CTD/DTOS/Northeast
[redacted] (Cell)
[redacted] (Desk)

From: Patel, Sanjay (CRT) [redacted]
Sent: Thursday, October 6, 2022 1:39 PM
To: [redacted] (CTD) (FBI) [redacted]
Subject: [EXTERNAL EMAIL] - Re: Outreach to USCCB

Stephanie -
Some of my managers, including the AAG, are planning to attend the USCCB meeting (or at least for the beginning of the meeting).

May I adjust the agenda so that I can allow the AAG to speak at the beginning of the meeting?

SP

Sent from my iPhone

On Oct 4, 2022, at 2:19 PM, Patel, Sanjay (CRT)e[redacted] wrote:

Yes, Tues Oct 11 works great.
My day is wide open.

From: [redacted]
Sent: Tuesday, October 4, 2022 1:11 PM
To: Patel, Sanjay (CRT)e[redacted]
Subject: Fwd: Outreach to USCCB

Sanjay,
See below. Monday is a holiday; would Tuesday work for you?
Thanks!
Stephanie

From: [redacted] (OPE) (FBI)e[redacted]
Sent: Tuesday, October 4, 2022e12:50:36 PM
To: [redacted] (CTD) (FBI) [redacted]; [redacted] (OPE) (FBI) [redacted]
Subject: RE: Outreach to USCCB

Hi,

Would next Monday or Tuesday work? It seems they plan to cut down on the number of attendees on their end to avoid the scheduling hiccups.

From: [redacted] (CTD) (FBI)e[redacted]
Sent: Monday, October 3, 2022 8:23 AM
To:e[redacted] (OPE)(FBI) [redacted]; [redacted] (OPE) (FBI)e[redacted]
Subject: Outreach to USCCB

Alicia,

Just touching base to see if you have heard anything from the USCCB yet? Just FYI, DOJ is hosting a meeting on Friday October 7, 2022 with the following groups which represent 85% of pro-life providers:

Care Net, Nat'l Institute of Family and Life Advocates (NIFLA), and Heartbeat International.

Thanks!

[redacted]
Unit Chief
CTD/DTOS/Northeast
[redacted] (Cell)
[redacted] (Desk)

EXHIBIT 010

From: "Weiner, Robert (CRT)" <[redacted]>
To: "Bond, Rebecca (CRT)" <[redacted]>
Subject: FACE Resource Booklet and Pregnancy Counseling Centers
Date: Wed, 17 Aug 2022 11:12:39 -0400
Importance: Normal
Attachments: FACE_Resource_Booklet_FINALl(002).docx

Rebecca,

The hardening recommendations in this Resource Booklet apply to any organization offering services related to pregnancy. But, as the vast majority of FACE Act violations have involved anti-abortion efforts directed at abortion providers and patients, the booklet naturally focuses more on those activities. There are thus a number of aspects of the booklet that may militate against pushing it out during a meeting with Pregnancy Counseling Centers.

P. 2 – Affirming the breadth of the recommendations, the booklet states at the outset: "This instructional booklet is intended to provide reproductive healthcare providers and other similar organizations with practical information and proactive security measures that can be used to reduce risk and prevent violence against personnel and facilities."

P. 2, *passim* – the booklet refers to "clinics" throughout. Are "Pregnancy Counseling Centers" typically and appropriately described as "clinics"? Mostly, the booklet refers to "reproductive healthcare" and "reproductive healthcare providers," which arguably can include the anti-abortion centers, though some might dispute whether they dispense health care.

P. 4 – "Anti-abortion extremist activity is not always confined to public places."

Pp. 4 and 5 – cites National Abortion Federation.

P. 9 – cites 2015 attack on Planned Parenthood clinic that killed a police officer and two civilians.

P. 11 – Cites murder of Dr. David Gunn during an antiabortion protest in 1993.

P. 11 – "The FACE Act does not reach all forms of abusive conduct directed at reproductive health care providers. For example, patients and staff may often feel 'intimidated' or 'interfered with' by people expressing anti-abortion views."

P. 18 – The references list under "Non-Governmental Organizations," Planned Parenthood, National Abortion Federation, and Feminist Majority Foundation.

Rob

EXHIBIT 011

From: "Weiner, Robert (CRT)" <[redacted]>
To: "Moossy, Robert (CRT)" <[redacted]>
Subject: Abortion references in Resource Booklet
Date: Fri, 07 Oct 2022 12:16:47 -0400
Importance: Normal
Attachments: Resource_Booklet_for_Reproductive_Health_Care_Providers_and_Their_Staffs_--_abortion_references.pdf

---

Robert,

I have highlighted the references that Roland Warren was citing in the Resources Booklet for Reproductive Health. There aren't very many, but they are obvious. To some extent, it is entirely justified to refer to anti-abortion extremism, as that is a significant part of what the FACE Act and the Booklet covers. But it is true that the list of references in Appendix B, includes NGOs Planned Parenthood, National Abortion Federation, and Feminist Majority Foundation—only.

It should not be a heavy lift to make the document more inclusive from t he perspective of the pro-life organizations.

Rob

EXHIBIT 012

Resource Booklet for Reproductive Health Care Providers and Their Staffs

National Task Force on Violence Against Reproductive Health Care Providers
3/17/2022

Table of Contents

Introduction 2
Reducing Risk 3
Reducing Risk at Places of Business 3
Reducing Risk at Home 4
Reducing Risk of Cyber Attacks 5
Threats 7
Suspicious Packages and White Powder Letters 8
Active Shooters 9
Federal Statutes 11
Appendix A: The FACE Act 15
Appendix B: References 18
Appendix C: Example Checklists 19

Introduction

This instructional booklet is intended to provide reproductive healthcare providers and other similar organizations with practical information and proactive security measures that can be used to reduce risk and prevent violence against personnel and facilities. Please share this booklet with all staff members.

A series of forms and checklists with important phone numbers and procedures are included in the appendices. These can be printed out and should be placed where they are most needed.

On November 9, 1998, the Department of Justice established the Task Force on Violence Against Health Care Providers. The Assistant Attorney General for the Civil Rights Division of the Department of Justice chairs the Task Force, and the Task Force Director is an attorney with the Criminal Section of the Civil Rights Division. The Task Force is staffed by attorneys and other staff from the Civil Rights, Criminal and National Security Divisions of the Department of Justice, and by investigators and other representatives from the Federal Bureau of Investigation (FBI), the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), the United States Postal Inspection Service (USPIS), and the United States Marshals Service (USMS). For additional information please visit the National Task Force on Violence Against Health Care Providers website https://www.justice.gov/crt/national-task-force-violence-against-reproductive-health- care-providers.

You can contact the National Task Force on Violence Against Health Care Providers at: Clinicviolence.Taskforce@usdoj.gov

A digital copy of this resource booklet can be found at: https://www.fbi.gov/investigate/civil-rights

Reducing Risk

Since the passage of the Freedom of Access to Clinic Entrances (FACE) Act, 18 U.S.C. §248, in 1994, the number of large-scale clinic blockades has declined. However, incidents of violence and threats towards reproductive health care providers and their staff members have continued. Although laws exist to combat and address this behavior, providers and their staff members are encouraged to take active steps to reduce their own risk of victimization.

Forging a relationship with law enforcement in your area is an important step in reducing risk to your facility. Contact the FBI and U.S. Attorney's office in your area to establish a liaison should you have legal questions or concerns. The U.S. Marshal's Service can provide information on improving your physical security. It is also important to establish a relationship with your local law enforcement agencies to ensure that they understand your concerns.

Reducing Risk at Places of Business

Clinics have been targets of arson, bombing, vandalism and other dangerous and disruptive activities. Below is a list of suggestions to reduce and mitigate the risks of such activities:

- Install dead bolt locks on office doors leading to hallways and other public areas.
- Consider installing a "buzzer" entry door system.
- Consider installing a perimeter fence.
- Managers should issue and control keys, conduct regular inventories, and have locks changed when keys are missing.
- Have offices cleaned during business hours.
- Ensure that cleaning personnel do not have access to security alarm codes.
- Instruct all employees on operation of your security system.
- Do not allow visitors access to secure areas.
- Immediately report persons who appear unannounced in your work area.
- Be cognizant of suspicious individuals loitering in public areas outside of your facility.
    - Take note of extra baggy clothing and nervous behavior.
    - Record description of suspicious persons or vehicles including license plates.
- Do not admit unexpected repair or delivery people.
- Check with a security company for information on available equipment and services.
- Install video surveillance and exterior lighting.
- Control exterior vegetation to eliminate hiding places.
- Develop a comprehensive inventory including serial numbers, pictures and values.
- Keep a list of suppliers with phone numbers, addresses and points of contact.
- Develop a list of minimum equipment and supplies needed to reestablish the clinic.
- Keep a copy of all important documents in a safe, off-site location.

- Evaluate the need for a security guard.
- Develop a written emergency response plan for threats and refresh employee training. Information can be found at: https://www.ready.gov/business/implementation/emergency.
- Ask local police and/or U.S. Marshal Service to evaluate your emergency response plan.
- Keep bomb threat/personal threat checklists by each telephone and ensure staff is familiar with the forms found at: https://www.cisa.gov/publication/dhs-bomb-threat-checklist.

Reducing Risk at Home

Anti-abortion extremist activity is not always confined to public places. Reproductive healthcare providers and their staff members have also been targeted for protest activity at their private residences. Most often, this activity consists of picketing, leafleting, or posting flyers in residential neighborhoods. Many cities and towns have enacted residential picketing laws in order to restrict or prevent picketing at private residences. The National Abortion Federation compiled a list of such injunctions and ordinances and listed them by state. The list is not exhaustive and is current as of 2017. To obtain a copy of this legal remedies resource, contact the National Abortion Federation: http://www.prochoice.org.

In addition to picketing, some anti-abortion extremists have also engaged in stalking, vandalism and even murder. The following is a list of safety measures providers and their staff members may want to incorporate in order to reduce their risk of being victimized at home:

- Do not put your name on the outside of your residence or mailbox.
- Install an appropriate security system.
- Have good outside lighting.
- Control vegetation to eliminate hiding places.
- Entrances should have deadbolt locks and one way peep-holes.
- Account for all copies of house keys.
- Change locks if keys are lost or stolen and when moving to a new residence.
- Keep doors locked, even if you are at home.
- Develop friendly relationships with neighbors.
- Arrange for unlisted/unregistered home and mobile telephone numbers.
- Use a timer to turn lights on and off at varying times and locations.
- Leave a radio playing while you are away (best with a timer).
- Notify the police or a trusted neighbor of your absence.
- Report and maintain a record of all suspicious activity.
- Ensure law enforcement is aware of any concerns you may have.

Reducing Risk of Cyber Attacks

According to National Abortion Federation statistics, between the years 2010 and 2019 reproductive healthcare providers reported over 128,000 incidents of either hate email or internet harassment. In addition to threats and harassment, providers and their staff members have had their photographs and personal information posted online, making them targets for cyber stalking and other types of cyber crimes. As uses of the internet and social media continue to increase, ideologically driven individuals may choose to target reproductive healthcare centers, providers and their staff for a variety of cyber attacks. These attacks can include phishing (attempts to obtain financial or other confidential information from internet users, typically by sending an email that looks as if it is from a legitimate organization, but contains a link to a fake website that replicates the real one); denial of service attacks (attacks designed to incapacitate a network by flooding it with useless traffic); defacement of websites (attacks changing the visual appearance of a website); and computer intrusion to either steal or demand ransom for clinic data about staff and patients. Following these tips on your work and home computers and internet connected devices will help reduce the risk of victimization:

Users

- Verify the spelling of web addresses, websites, and email addresses that look trustworthy but may be imitations of legitimate election websites.
- Update anti-malware and anti-virus software and conduct regular scans.
- Do not enable macros on documents downloaded from an email unless absolutely necessary, and after ensuring the file is not malicious.
- Do not open emails or attachments from unknown individuals. Do not communicate with unsolicited email senders.
- Never provide personal information of any sort via email. Be aware that many emails requesting your personal information may appear to be legitimate.
- Disable or remove unneeded software applications.
- Verify the website you visit has a Secure Sockets Layer (SSL) certificate.

IT Administrators

- Require multi-factor authentication for remote access to IT networks.
- Enable strong spam filters to prevent phishing emails from reaching end users. Filter emails containing executable files from reaching end users.
- Implement a user training program and simulated attacks for spear phishing to discourage users from visiting malicious websites or opening malicious attachments and reinforce the appropriate user responses to spear phishing emails.
- Filter network traffic to prohibit ingress and egress communications with known malicious IP addresses. Prevent users from accessing malicious websites by implementing URL blocklists and/or allow lists.
- Update software, including operating systems, applications, and firmware on IT network assets, in a timely manner. Consider using a centralized patch management system; use a risk-based assessment strategy to determine which OT network assets and zones should

participate in the patch management program.

Victim Reporting and Additional Information

The FBI encourages the public to report information concerning suspicious or criminal activity to their local field office (www.fbi.gov/contact-us/field-offices) or the FBI's Internet Crime Complaint Center (www.ic3.gov).

Threats

Although certain behaviors can be upsetting, the FACE Act criminalizes only those threats that are "true threats." A true threat is defined as a serious communication of an intent to commit an act of unlawful violence against an individual or group. Absent additional circumstances, carrying graphic signs, videotaping patients or doctors, writing down license plates, and even screaming or shouting would not typically rise to the level of a being considered a true threat.

With the explosion of internet use and social media, cyber threats are no longer limited to just threats received via email. Threats can be posted on message boards, social media pages, and comments sections. These threats don't have to be posted on the provider's sites or social media to be considered threats. Threats can be posted on the comments section of a news story or in issue-specific chat rooms. Regardless of where the threat is found, it should be taken very seriously.

The following steps should be taken for threats:

- Notify local law enforcement if there is any reason to believe the threat is imminent.
- For cyber threats:
  - Take a screen shot, print a copy, and/or download an electronic copy if possible.
  - Immediately notify your IT and security professionals.
  - Do not delete the threat message.
- For threats received by telephone:
  - Use a bomb checklist to record information (see example in Appendix C below).
  - Do not hang up – even if the caller does.
  - Stay calm and ask the caller as many questions about the threat as possible.
  - Note as many details about the caller as possible.
  - Record the telephone number of the caller.
- For threats received by mail:
  - Limit the number of people that handle the letter to preserve evidence.
  - See the below section on Suspicious Packages
- Notify the local FBI office.

Suspicious Packages and White Powder Letters

Characteristics of a suspicious package:

- Packages that you are not expecting or from businesses/people you are not familiar with
- Words spelled incorrectly
- Return address and postmark do not match
- Envelope is addressed generically to "Medical Director" or "Security Director"
- No return addresses or return address typed on adhesive labels
- Possibly mailed from outside the U.S.
- Envelopes or packages from businesses with no business stationary
- Protruding wires
- Strange odor, oily stains, discolorations, or crystallization on wrapper
- Excessive tape or string
- Excessive postage
- Granular material in the package
- Rigidness or bulkiness

If you discover a suspicious letter or package:

- Do not open it.
- Treat it as suspect.
- Isolate it—don't handle.
- Contact building security, if available.
- *If there is a medical emergency or chemical reaction with a letter or package, call 911.*

If you suspect a bomb:

- Evacuate immediately.
- Call 911 for police, fire and hazmat unit.
- Move to designated meeting area away from the building.

If there is a release of gas or powder:

- Turn off fans or ventilation units and shut down the air handling system in the building.
- Leave area immediately.
- Close the door or section off the area to prevent others from entering.
- Notify your building security official or a supervisor and call 911.
- List all people who were in the room or area. Give the list to public health authorities.
- FBI will conduct a thorough risk and threat assessment. The item will then be transported by the FBI laboratory for testing.

Active Shooters

On November 27, 2015, Robert Lewis Dear, Jr. attacked a Planned Parenthood clinic in Colorado Springs, Colorado. A police officer and two civilians were killed; five police officers and four civilians were injured. After a standoff that lasted five hours, police SWAT teams crashed armored vehicles into the clinic's lobby and the attacker surrendered.

An "active shooter" is an individual who is engaged in killing or attempting to kill people in a confined and populated area; in most cases, active shooters use firearms and there is no pattern or method to their selection of victims.

When an active shooter is in your vicinity, you must be prepared both mentally and physically to deal with the situation. You have three options:

RUN

- Wherever you go, be aware of alternate exits.
- Quickly and cautiously evacuate in a direction away from the attacker.
- Don't hesitate. Seconds matter.
- Remember windows and emergency exits.
- Leave belongings behind.
- Keep empty hands raised and clearly visible.
- Follow all instructions from the police.
- Don't stop until you are sure you have reached a safe location.

HIDE

- If there is no safe escape route, find a good hiding place.
- Lock and barricade the door.
- Silence cell phones.
- Prepare a defense plan.

FIGHT

- Fight only as a last resort.
- Use available objects as improvised weapons.
- Use teamwork and surprise, a coordinated ambush can incapacitate an attacker.
- You are fighting for your life, don't fight fair!

Information to provide to 911 operations:

- Location of the active shooter (provide street address if possible)
- Number of shooters

- Physical description of shooter
- Number and type of weapons shooter has
- Number of potential victims at location

When law enforcement arrives (typical law enforcement response is three minutes):

- Remain calm and follow instructions.
- Drop items in your hands (e.g., bags, jackets).
- Raise hands and spread fingers.
- Keep hands visible at all times.
- Avoid quick movements toward officers, such as holding on to them for safety.
- Avoid pointing, screaming or yelling.
- Do not ask questions when evacuating.

The first officers to arrive on scene will not stop to help the injured. Responding officers will move to the sounds of gun fire with the intent to neutralize the shooter. Expect rescue teams to follow initial officers. These rescue teams will treat and remove the injured.

Once you have reached a safe location, you will likely be held in that area by law enforcement until the situation is under control and all witnesses have been identified and questioned. Do not leave the area until law enforcement authorities have instructed you to do so.

More information including a video to show employees can be found on the FBI website at. https://www.fbi.gov/about/partnerships/office-of-partner-engagement/active-shooter-resources.

Another good source of information is the DHS website at https://www.cisa.gov/active-shooter-preparedness.

Federal Statutes

From the mid-1980s through the 1990s, clinic violence and harassment escalated across the nation. Clinics experienced increased blockades, arsons, bomb threats, death threats, vandalism, and harassment. On March 10, 1993, the first murder of a reproductive health care provider occurred. Dr. David Gunn, a physician who provided abortion services, was murdered during an anti-abortion protest at a Pensacola, Florida clinic. In response to the alarming trend of increased violence, the U.S. Congress enacted the Freedom of Access to Clinic Entrances (FACE) Act, Title 18 of the U.S. Code, Section 248, in May of 1994. In addition to the FACE Act, the below laws and others not listed may be used in the investigation and prosecution of illegal acts against reproductive health care providers and their staffs.

Freedom of Access to Clinic Entrances (FACE) Act, 18 U.S.C. § 248

The FACE Act makes it a federal crime to use force, threat of force, or physical obstruction to intentionally injure, intimidate, or interfere with persons because they are seeking or providing reproductive health services, or to intimidate others or attempts to injure, intimidate, or interfere with any person because they are seeking or providing such services. In addition, the law prohibits damage or destruction of the property of a facility because the facility provides reproductive health care services. Violators of the FACE Act are subject to criminal penalties, including imprisonment and fines. The severity of the punishment depends upon the nature of the offense and whether or not the person is a repeat offender. The FACE Act also allows providers and seekers of reproductive health care services, the United States Attorney General, and State Attorneys General to sue for civil remedies against conduct which violates the Act. The civil remedies can include injunctions, including buffer zones, and monetary damages. The full text of the FACE Act is set forth in Appendix A.

The FACE Act does not reach all forms of abusive conduct directed at reproductive health care providers. For example, patients and staff may often feel "intimidated" or "interfered with" by people expressing anti-abortion views. However, absent use of force, threat of force, or an act of physical obstruction, offensive conduct is not prohibited by the FACE Act. Nonetheless, the FACE Act is an important means of combating and deterring violence and threats of violence against reproductive health care providers. If you feel that you have been a victim of conduct in violation of the FACE Act, notify your local FBI or U.S. Attorney's Office. Contact information for your local FBI office can be found here: https://www.fbi.gov/contact-us/field-offices. Contact information for your local U.S. Attorney's Office can be found here: https://www.justice.gov/usao/us-attorneys-listing.

Conspiracy Against Rights, 18 U.S.C. § 241

Section 241 of Title 18 establishes a federal criminal offense where two or more persons to conspire to injure, oppress, threaten, or intimidate any person in the exercise or enjoyment of any right or privilege secured to him or her by the Constitution or laws of the United States, which includes a violation of the FACE Act. The charge carries a penalty of up to 10 years imprisonment; or, if death results from the acts or if such acts involve kidnapping or an attempt to kidnap, aggravated sexual abuse or attempt to commit aggravated sexual abuse, or an attempt to kill, the offender may be sentenced to any term of years, or for life, or in certain cases may be sentenced to death.

Damage or Destruction of Property Used in Interstate Commerce, 18 U.S.C. § 844(i)

Section 844(i) of Title 18 establishes a federal criminal offense where an individual "maliciously damages or destroys, or attempts to damage or destroy, by means of fire or an explosive, any building, vehicle, or other real or personal property used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce."

Since many reproductive health services clinics serve patients from other states and order medical supplies from other states, clinics may qualify as property used in interstate commerce. Charges under § 844(i) frequently have been brought in cases of arson or bombing of reproductive health services clinics. The charge carries a penalty of 5 to 20 years in prison absent physical injury and 7 to 40 years if injury results. Where death results from a violation of this statute, the offender may be sentenced to death.

Use of a Firearm in the Commission of a Felony, 18 U.S.C. § 924(c)

Section 924(c) of Title 18 establishes a federal criminal offense where an individual uses or carries a firearm during or in relation to a crime of violence or drug trafficking crime prosecutable in federal court, or, in furtherance of any such crime, possesses a firearm. The mandatory minimum penalty is 5 years imprisonment. The penalty increases to 7 years if the firearm is brandished during the offense, and 10 years if it is discharged. Penalties for subsequent offenses are significantly increased, as are penalties for the use of certain illegal and proscribed firearms and silencers. The use of a firearm in the commission of a felony offense related to a clinic might warrant prosecution under § 924(c).

Use of the Mails or Commerce for Bomb or Fire Threats, 18 U.S.C. § 844(e)

Section 844(e) of Title 18 establishes a federal criminal offense to use the United States Mail, a telephone, or other instrument of interstate commerce to communicate a threat or to convey false information concerning a threat. Cases brought under § 844(e) generally involve bomb or arson threats. This offense carries a penalty of up to 10 years imprisonment.

Threats Made by Use of Interstate or Foreign Commerce, 18 U.S.C. §§ 875 and 876

These statutes prohibit the use of interstate or foreign commerce, generally telephones, internet communications and electronic mail, and the mails, to convey threats to kidnap or injure another. Increased penalties are provided where the threat is made with the intent to extort a "thing of value." Courts have found that actions taken for the purpose of harming a business (including a clinic) may demonstrate an intent to extort a thing of value. The Department of Justice has used § 875 to prosecute a case involving computer-generated threats made by electronic mail to, among others, reproductive health care providers. Violations of this statute carry a penalty of up to 20 years in prison.

Interference with Commerce by Threats or Violence, 18 U.S.C. § 1951

Section 1951, more commonly referred to as the "Hobbs Act," prohibits conduct that obstructs, delays or affects commerce by means of robbery or extortion. The statute also covers attempts to commit these acts, conspiracy to commit the acts, and any threats made to cause injury or damage to a person or property in order to commit these acts. Attempts to coerce a reproductive health care provider to limit or halt operations may constitute a violation of this statute. Violations carry a penalty of up to 20 years in prison.

Interstate Travel or Transportation to Aid in Racketeering Enterprises, 18 U.S.C. § 1952

More commonly referred to as the "Travel Act," Section 1952 sets a penalty of up to 5 years for persons who either travel in interstate or foreign commerce, or use the mails or other facility in interstate or foreign commerce, to commit any crime of violence in furtherance of some unlawful activity, or to promote, manage, establish, carry on or facilitate the promotion, management, establishment or carrying on of any unlawful activity. In sum, this statute makes it illegal to travel between states, or between another country and the United States, in order to commit certain illegal acts. Traveling across state lines to perpetrate a crime of violence against a reproductive health care provider might warrant prosecution under § 1952.

Use of Certain Weapons of Mass Destruction, 18 U.S.C. § 2332a

Section 2332a prohibits the use, threat of use, or attempted or conspired use of a weapon of mass destruction, including a biological agent, toxin, or vector against any person within the United States the results of which affect interstate commerce. The term "weapon of mass destruction" is also defined under this section and includes any destructive device as defined under § 921 of this title, any weapon that is designed or intended to cause death or serious bodily injury through the release, dissemination, or impact of toxic or poisonous chemicals, or their precursors; any weapon involving a disease organism; or any weapon that is designed to release radiation or radioactivity at a level dangerous to human life. Use or threatened use of a chemical weapon is covered under 18 U.S.C. § 229. The offender is eligible to be sentenced to any term of years, or for life, or in certain cases may be sentenced to death.

Concurrent Jurisdiction with State and Local Authorities

Many criminal activities that affect reproductive health care providers constitute crimes at the federal, state, and local level. Many jurisdictions have local ordinances for trespassing and disorderly conduct, for example, which may prohibit conduct not covered by a federal statute. Some states have adopted statutes almost identical to FACE, providing for concurrent jurisdiction in many cases.

Charging decisions involving offenses related to reproductive health care providers generally are made by the Civil Rights Division's Criminal Section in consultation with United States Attorney's Office (USAO) and in cooperation with state and local authorities. Per a July 31, 2009, directive from the Attorney General, USAOs must notify the Criminal Section of the Civil Rights Division immediately upon learning of any potential FACE Act violations within their district and to consult with the Criminal Section prior to making any charging or non-charging decisions.

Civil Remedies

In addition to criminal penalties that may arise in relation to conduct affecting reproductive health care providers, federal law provides for civil remedies where private parties or the federal or state governments bring suit.

Civil actions under the FACE Act may be brought by an aggrieved private party (such a health care provider), the United States Attorney General, or the Attorney General for any state. As a general matter, establishing a civil violation under the FACE Act requires proof of the same elements outlined in the criminal discussion of the statute. However, the remedies available in the civil context differ, and may include injunctive relief, civil penalties, actual or statutory damages, punitive damages, and attorney fees for actions that are not brought by a government. Additionally, in a civil case, the private or public plaintiff need only prove the case by a preponderance of the evidence, rather than beyond a reasonable doubt.

The United States Department of Justice, through the Special Litigation Section of the Civil Rights Division, has secured a number of important decisions using the civil remedies of the FACE Act to win permanent injunctive relief against persons who violated the Act in the context of blockades, "lock-and-blocks," threats, and other obstructive conduct. The government has secured judgments that bar specific defendants from entering the property of certain clinics, and the government has secured rulings requiring "buffer zones" around clinics in order to balance the interests of legitimate and protected protest and the rights of clinics to operate their legal businesses.

For more information regarding the civil aspects of the Freedom of Access to Clinic Entrances Act, visit the Special Litigation Section's webpage at https://www.justice.gov/crt/special-litigation-section.

Appendix A: The FACE Act

Freedom of Access to Clinic Entrances (FACE) Act of 1994 –Title 18 U.S. Code, Section248

(a) PROHIBITED ACTIVITIES- Whoever-

(1) by force or threat of force or by physical obstruction, intentionally injures, intimidates or interferes with or attempts to injure, intimidate or interfere with any person because that person is or has been, or in order to intimidate such person or any other person or class of persons from, obtaining or providing reproductive health services;

(2) by force or threat of force or by physical obstruction, intentionally injures, intimidates or interferes with or attempts to injure, intimidate or interfere with any person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship; or

(3) intentionally damages or destroys the property of a facility, or attempts to do so, because such facility provides reproductive health services, or intentionally damages or destroys the property of a place of religious worship, shall be subject to the penalties provided in subsection (b) and the civil remedies provided in subsection (c), except that a parent or legal guardian of a minor shall not be subject to any penalties or civil remedies under this section for such activities insofar as they are directed exclusively at that minor.

(b) PENALTIES- Whoever violates this section shall -

(1) in the case of a first offense, be fined in accordance with this title, or imprisoned not morethan one year, or both; and

(2) in the case of a second or subsequent offense after a prior conviction under this section, be fined in accordance with this title, or imprisoned not more than 3 years, or both; except that for an offense involving exclusively a nonviolent physical obstruction, the fine shall be not more than $10,000 and the length of imprisonment shall be not more than six months, or both, for the first offense; and the fine shall be not more than $25,000 and the length of imprisonment shall be not more than 18 months, or both, for a subsequent offense and except that if bodily injury results, the length of imprisonment shall be not more than 10 years, and if death results, it shall be for any term of years or for life.

(c) CIVIL REMEDIES-

(1) RIGHT OF ACTION

(A) IN GENERAL - Any person aggrieved by reason of the conduct prohibited bysubsection (a) may commence a civil action for the relief set forth in subparagraph (B), except that such an action may be brought under subsection

(a)(l) only by a person involved in providing or seeking to provide reproductive health services, and such an action may be brought under subsection (a)(2) only by a person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of worship or by the entity that owns or operates such a place of worship.

(B) RELIEF- In any action under subparagraph (A), the court may award appropriate relief, including temporary, preliminary or permanent injunctive relief and compensatory and punitive damages, as well as the costs of suit and reasonable fees for attorneys and expert witnesses. With respect to compensatory damages, the plaintiff may elect, at any time prior to the rendering of final judgment, to recover, in lieu of actual damages, an award of statutory damages in the amount of $5,000 per violation.

(2) ACTION TAKEN BY ATTORNEY GENERAL OF THE UNITED STATES

(A) IN GENERAL - If the Attorney General of the United States has reasonable cause to believe that any person or group of persons is being, has been, or may be injured by conduct constituting a violation of this section, the Attorney General may commence a civil action in any appropriate United States District Court.

(B) RELIEF - In any action under subparagraph (A), the court may award appropriate relief, including temporary, preliminary or permanent injunctive relief, and compensatory damages to persons aggrieved as described in paragraph (1)(B). The court, to vindicate the public interest, may also assess a civil penalty against each respondent—

(i) in an amount not exceeding $10,000 for a nonviolent physical obstruction and $15,000 for other first violation; and

(ii) in an amount not exceeding $15,000 for a nonviolent physical obstruction and $25,000 for any other subsequent violation.

(3) ACTIONS BY STATE ATTORNEYS GENERAL

(A) IN GENERAL- If the Attorney General of a State has reasonable cause to believe that any person or group of persons is being, has been, or may be injuredby conduct constituting a violation of this section, such Attorney General may commence a civil action in the name of such State, as parens patriae on behalf of natural persons residing in such State, in any appropriate United States DistrictCourt.

(B) RELEF- In action under subparagraph (A), the court may award appropriate relief, including temporary, preliminary or permanent injunctive relief,

compensatory damages, and civil penalties as described in paragraph (2)(B).

DEFINITIONS—As used in this section:

(1) FACILITY- The term 'facility' includes a hospital, clinic, physician's office, or other facility that provides reproductive health services, and includes the building or structure in which the facility is located.

(2) INTERFERE WITH- The term 'interfere with' means to restrict a person's freedom of movement.

(3) INTIMIDATE- The term 'intimidate' means to place a person in reasonable apprehension of bodily harm to him/herself or to another.

(4) PHYSICAL OBSTRUCTION- The term 'physical obstruction' means rendering impassable ingress to or egress from a facility that provides reproductive health services or to or from a place of religious worship, or rendering passage to or from such a facility or place of religious worship unreasonably difficult or hazardous.

(5) REPRODUCTIVE HEALTH SERVICES- The term 'reproductive health services' means reproductive health services provided in a hospital, clinic, physician's office, or other facility, and includes medical, surgical, counseling or referral services relating to pregnancy or the termination of a pregnancy.

(6) STATE- The term 'State" includes a State of the United States, the District of Columbia, and any commonwealth, territory, or possession of the United States.

Appendix B: References

Government Agencies

Department of Justice Civil Rights Division	https://www.justice.gov/crt
Federal Bureau of Investigation	https://www.fbi.gov
US Marshals Service	http://www.usmarshals.gov
Bureau of Alcohol, Tobacco, Firearms	https://www.atf.gov
US Postal Inspection Service	https://postalinspectors.uspis.gov
Federal Emergency Management Agency	http://www.fema.gov

Non-Governmental Organizations

Planned Parenthood	https://www.plannedparenthood.org
National Abortion Federation	http://prochoice.org
Feminist Majority Foundation	http://feminist.org

Information on Cyber Threats

Department of Homeland Security Cyber Security Information
https://www.dhs.gov/topic/cybersecurity
More information of Cyber Crimes
https://www.fbi.gov/investigate/cyber
Internet Crimes Complaint Center
http://www.ic3.gov

Information on Bomb Threats

DHS Bomb Threat Checklist
https://www.cisa.gov/publication/dhs-bomb-threat-checklist
FBI suspicious package info sheet
https://www.fbi.gov/file-repository/suspicious-package-indicators.pdf/view
FEMA Emergency Response Plan
https://www.ready.gov/explosions
More information on Emergency Response Plans
https://www.ready.gov/business/implementation/emergency

Information on Active Shooters

FBI Active Shooter Video
https://www.fbi.gov/about/partnerships/office-of-partner-engagement/active-shooter-resources
DHS Active Shooter resources
https://www.cisa.gov/active-shooter-preparedness

Appendix C: Example Checklists

The National Explosives Task Force (NETF) coordinates rapid integration of explosives expertise with intelligence and law enforcement information to support operational activities. Products are peer-reviewed by explosives experts from participating agencies.

National Explosives Task Force

Suspicious Package Indicators and Recommended Response Procedures

Package bombs, which include letters, parcels, and anything delivered by postal or courier service, are not a new technique and have been used by terrorists and anarchist groups. Many of these bombs are triggered when victims handle or open the packages, although they can be initiated in other ways.

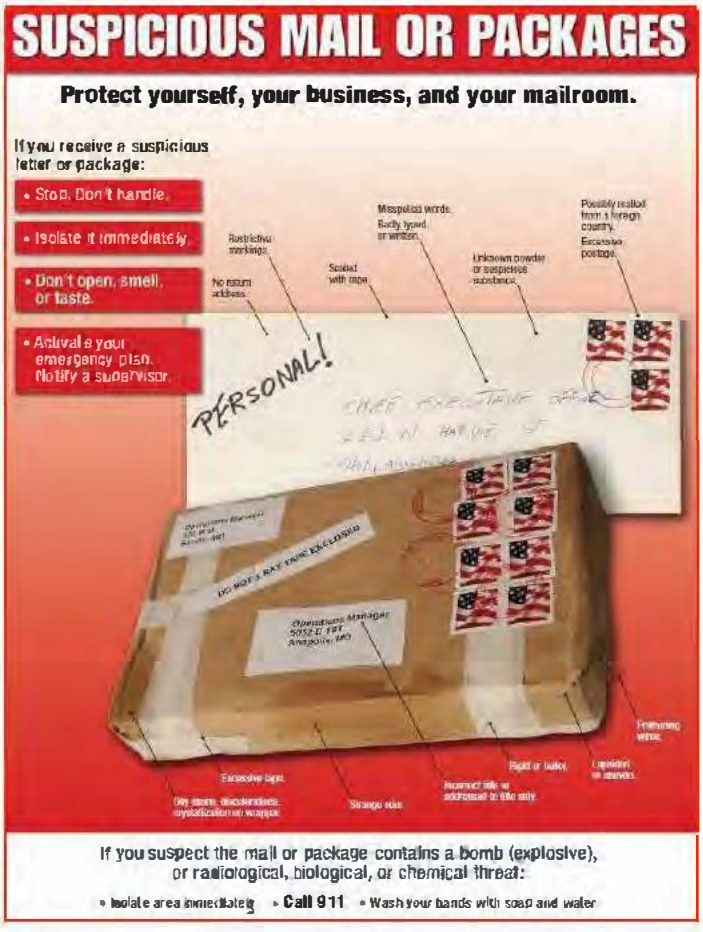
Package bombs come in a variety of shapes and sizes, and they may look harmless. There are a number of characteristics that may lead you to become suspicious of a letter or package.

If you believe a letter or package is suspicious:

- Stop. Do not handle or open.
- Do not use cell phones, pagers, or two-way radios near suspected devices.
- Be aware of secondary devices.
- Evacuate and isolate the immediate area.
- If applicable, activate the facility's emergency plan.
- Make note of the characteristics that caused suspicion.
- Call 911.

Formal Screening Procedures

Commercial or government entities with mail screening procedures are advised to review existing procedures for screening packages, identifying suspicious items, and instituting the appropriate safety protocols. If no current procedures are in place, guidance should be



https://about.usps.com/posters/pos84.pdf

sought from local, state, and/or federal resources. Planning considerations shouldinclude (but not be limited to) recurring training for screeners, an understanding of the standards and limitations for operating times, and regularly scheduled maintenance of screening equipment, such ascalibration, updates, and testing.

Response Procedures

The NETF prepared this document to raise awareness of package bombs and the need for diligence and safety procedures in evaluating suspected improvised explosive devices. If a suspicious package is found, call 911. Any diagnostic or render safe actions should be performed only by FBI HazardousDevices School (HDS) certified public safety bomb technicians or current U.S. military explosive ordnance disposal technicians.

The U.S. government has resources on mail security available to citizens and businesses. More information can be found at http://about.usps.com/securing-the-mail/mail-security-center.htm

To report suspicious activity, call 911 or contact local law enforcement.

Suspicious activity reports (SARs) will be forwarded to the appropriate fusion center and FBI Joint Terrorism Task Force for further action. For more information on the Nationwide SAR Initiative, visit: https://nsi.ncirc.gov/resources.aspx.

March 2018

When law enforcement arrives:

- Remain calm and follow instructions.
- Drop items in your hands. (e.g., bags, jackets)
- Raise hands and spread fingers.
- Keep hands visible at all times.
- Avoid quick movements toward officers, such as holding on to them for safety.
- Avoid pointing, screaming or yelling.
- Do not ask questions when evacuating.

Information to provide to 911 operators:

- Location of the active shooter.
- Number of shooters.
- Physical description of shooters.
- Number and type of weapons shooter has.
- Number of potential victims at location.

For questions or additional assistance contact:

Your local FBI Office:

FBI Headquarters National Press Office: (202) 324-3691

Federal Bureau of Investigation
935 Pennsylvania Avenue, NW
Washington, DC 20535

U.S. Department of Justice
Federal Bureau of Investigation

ACTIVE SHOOTER EVENT
QUICK REFERENCE GUIDE

An active shooter is an individual actively engaged in killing or attempting to kill people in a populated area.

- *Victims are selected at random.*
- *Event is unpredictable and evolves quickly.*
- *Knowing what to do can save lives.*

ACTIVE SHOOTER EVENTS

When an Active Shooter is in your vicinity, you must be prepared both mentally and physically to deal with the situation.

You have three options:

1 RUN

- Have an escape route and plan in mind.
- Leave your belongings behind.
- Evacuate regardless of whether others agree to follow.
- Help others escape, if possible.
- Do not attempt to move the wounded.
- Prevent others from entering an area where the active shooter may be.
- Keep your hands visible.
- Call 911 when you are safe.

2 HIDE

- Hide in an area out of the shooter's view.
- Lock door or block entry to your hiding place.
- Silence your cell phone (including vibrate mode) and remain quiet.

FIGHT 3

- Fight as a last resort and only when your life is in imminent danger.
- Attempt to incapacitate the shooter.
- Act with as much physical aggression as possible.
- Improvise weapons or throw items at the active shooter.
- Commit to your actions . . . your life depends on it.

The first officers to arrive on scene will not stop to help the injured. Expect rescue teams to follow initial officers. These rescue teams will treat and remove the injured.

Once you have reached a safe location, you likely will be held in that area by law enforcement until the situation is under control and all witnesses have been identified and questioned. Do not leave the area until law enforcement authorities have instructed you to do so.

BOMB THREAT PROCEDURES

This quick reference checklist is designed to help employees and decision makers of commercial facilities, schools, etc. respond to a bomb threat in an orderly and controlled manner with the first responders and other stakeholders.

Most bomb threats are received by phone. Bomb threats are serious until proven otherwise. Act quickly, but remain calm and obtain information with the checklist on the reverse of this card.

If a bomb threat is received by phone:

1. Remain calm. Keep the caller on the line for as long as possible. DO NOT HANG UP, even if the caller does.
2. Listen carefully. Be polite and show interest.
3. Try to keep the caller talking to learn more information.
4. If possible, write a note to a colleague to call the authorities or, as soon as the caller hangs up, immediately notify them yourself.
5. If your phone has a display, copy the number and/or letters on the window display.
6. Complete the Bomb Threat Checklist immediately. Write down as much detail as you can remember. Try to get exact words.
7. Immediately upon termination of call, DO NOT HANG UP, but from a different phone, contact authorities immediately with information and await instructions.

If a bomb threat is received by handwritten note:

- Call _____
- Handle note as minimally as possible.

If a bomb threat is received by e-mail:

- Call _____
- Do not delete the message.

Signs of a suspicious package:

- No return address
- Excessive postage
- Stains
- Strange odor
- Strange sounds
- Unexpected delivery
- Poorly handwritten
- Misspelled words
- Incorrect titles
- Foreign postage
- Restrictive notes

** Refer to your local bomb threat emergency response plan for evacuation criteria*

DO NOT:

- Use two-way radios or cellular phone. Radio signals have the potential to detonate a bomb.
- Touch or move a suspicious package.

WHO TO CONTACT (Select One)

- **911**
- **Follow your local guidelines**

For more information about this form contact the Office for Bombing Prevention at: OBP@cisa.dhs.gov

BOMB THREAT CHECKLIST

DATE: **TIME:**

TIME CALLER HUNG UP: **PHONE NUMBER WHERE CALL RECEIVED:**

Ask Caller:

- Where is the bomb located? (building, floor, room, etc.)
- When will it go off?
- What does it look like?
- What kind of bomb is it?
- What will make it explode?
- Did you place the bomb? Yes No
- Why?
- What is your name?

Exact Words of Threat:

Information About Caller:

- Where is the caller located? (background/level of noise)
- Estimated age:
- Is voice familiar? If so, who does it sound like?
- Other points:

Caller's Voice	Background Sound	Threat Language
☐ Female	☐ Animal noises	☐ Incoherent
☐ Male	☐ House noises	☐ Message read
☐ Accent	☐ Kitchen noises	☐ Taped message
☐ Angry	☐ Street noises	☐ Irrational
☐ Calm	☐ Booth	☐ Profane
☐ Clearing throat	☐ PA system	☐ Well-spoken
☐ Coughing	☐ Conversation	
☐ Cracking Voice	☐ Music	
☐ Crying	☐ Motor	
☐ Deep	☐ Clear	
☐ Deep breathing	☐ Static	
☐ Disguised	☐ Office machinery	
☐ Distinct	☐ Factory machinery	
☐ Excited	☐ Local	
☐ Laughter	☐ Long distance	
☐ Lisp		
☐ Loud		
☐ Nasal		
☐ Normal		
☐ Ragged		
☐ Rapid		
☐ Raspy		
☐ Slow		
☐ Slurred		
☐ Soft		
☐ Stutter		

Other Information:

EXHIBIT 013

From: "Weiner, Robert (CRT)" <[redacted]>
To: "Bradford, Aryele (PAO)" <[redacted]>
Subject: RE: MD Florida FACE Indictment (1/18)
Date: Wed, 18 Jan 2023 19:14:08 -0500
Importance: Normal

Kristen asked whether the anti-abortiondolks calledthemselves Pregnancy Centers or Pregnancy Resource Centers. Sanjay says both, but more often the former.

But apart form the question, I didn't get a clear answer from KC as to whether she signed off, so I've re-upped it with an indication that you'd like to get it to leadership.

Will let you know.

R

From: Bradford, Aryele (PAO) <[redacted]>
Sent: Wednesday, January 18, 2023 4:22 PM
To: Bernstein, Laura-Kate (CRT) <[redacted]>; Gibson, Rose (CRT)d<[redacted]>; Weiner, Robert (CRT) <[redacted]>; Morris, Catherine (PAO) <[redacted]>
Cc: Moossy, Robert (CRT) <[redacted]>; Felte, James (CRT)d<[redacted]>; Patel, Sanjay (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Subject: RE: MD Florida FACE Indictment (1/18)

Hey Team – I need to elevate this to the leadership offices, so do we have a final from KC? Thanks!

From: Bernstein, Laura-Kate (CRT) <[redacted]>
Sent: Tuesday, January 17, 2023 3:41 PM
To: Gibson, Rose (CRT)d<[redacted]>; Bradford, Aryeie (PAO) <[redacted]>; Weiner, Robert (CRT) <[redacted]>; Morris, Catherine (PAO) <[redacted]>
Cc: Moossy, Robert (CRT) <[redacted]>; Felte, James (CRT)d<[redacted]>; Patel, Sanjay (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Subject: RE: MD Florida FACE Indictment (1/18)

The case agent has advised that we should considermentioning the substantial assistance of the [redacted] Police Department,[redacted] Police Department, and the [redacted] Police Department in the investigation.

Thanks,

Laura-Kate

Laura-Kate Bernstein
Trial Attorney

Criminal Section
Civil Rights Division
U.S. Department of Justice
[redacted]

From: Gibson, Rose (CRT) <[redacted]>
Sent: Tuesday, January 17, 2023 3:32 PM
To: Bradford, Aryele (PAO) <[redacted]>; Weiner, Robert (CRT) <[redacted]>; Morris, Catherine (PAO) <[redacted]>
Cc: Moossy, Robert (CRT) <[redacted]>; Felte, James (CRT) <[redacted]>; Bernstein, Laura-Kate (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Subject: RE: MD Florida FACE Indictment (1/18)

Just heard from the trial team that the indictment will remain under seal until 1/23.

Rose Gibson
Deputy Chief, Criminal Section
Civil Rights Division
U.S. Department of Justice
[redacted]
She/her/hers

From: Bradford, Aryele (PAO) <[redacted]>
Sent: Tuesday, January 17, 2023 2:41 PM
To: Weiner, Robert (CRT) <[redacted]>; Gibson, Rose (CRT) <[redacted]>; Morris, Catherine (PAO) <[redacted]>
Cc: Moossy, Robert (CRT) <[redacted]>; Felte, James (CRT) <[redacted]>; Bernstein, Laura-Kate (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Subject: RE: MD Florida FACE Indictment (1/18)

Fair point. Is there a reason we can't say "pregnancy resource center" I think that might make it clearer for the public, but let me know if I'm missing something.

From: Weiner, Robert (CRT) <[redacted]>
Sent: Tuesday, January 17, 2023 2:38 PM
To: Bradford, Aryele (PAO) <[redacted]>; Gibson, Rose (CRT) <[redacted]>; Morris, Catherine (PAO) <[redacted]>
Cc: Moossy, Robert (CRT) <[redacted]>; Felte, James (CRT) <[redacted]>; Bernstein, Laura-Kate (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Subject: RE: MD Florida FACE Indictment (1/18)

Given that this is the first prosecution of its kind we have done, how about adding at the end of the headline, "That Provide Abortion Alternatives"?

So the full headline would read,

> **"Two Defendants Indicted for Civil Rights Conspiracy and FACE Act Offenses Targeting Reproductive Health Services Facilities Tat Provide Abortion Alternatives."**

From: Bradford, Aryele (PAO) <[redacted]>
Sent: Tuesday, January 17, 2023 12:27 PM

To: Gibson, Rose (CRT)[redacted]; Morris, Catherine (PAO) [redacted]
Cc: Moossy, Robert (CRT) [redacted]; Weiner, Robert (CRT) [redacted]; Felte, James (CRT)[redacted]; Bernstein, Laura-Kate (CRT) [redacted]; Patel, Sanjay (CRT) [redacted]; Fitzgerald, Paige (CRT) [redacted]
Subject: RE: MD Florida FACE Indictment (1/18)

Thanks, Rose. Sharing additional edits.

Flagging that Leadership will likely want to see this, so Rob can we get KC to sign off as soon as possible?

AB

From: Gibson, Rose (CRT)[redacted]
Sent: Tuesday, January 17, 2023 12:17 PM
To: Bradford, Aryele (PAO) [redacted]; Morris, Catherine (PAO) [redacted]
Cc: Moossy, Robert (CRT) [redacted]; Weiner, Robert (CRT) [redacted]; Felte, James (CRT)[redacted]; Bernstein, Laura-Kate (CRT) [redacted]; Patel, Sanjay (CRT) [redacted]; Fitzgerald, Paige (CRT) [redacted]
Subject: RE: MD Florida FACE Indictment (1/18)

Please use this version instead. Thank you!

Rose Gibson
Deputy Chief, Criminal Section
Civil Rights Division
U.S. Department of Justice
[redacted]
She/her/hers

From: Gibson, Rose (CRT)
Sent: Tuesday, January 17, 2023 6:02 AM
To: Bradford, Aryele (PAO) [redacted]; Morris, Catherine (PAO) [redacted]
Cc: Moossy, Robert (CRT) [redacted]; Weiner, Robert (CRT) [redacted]; Felte, James (CRT)[redacted]; Bernstein, Laura-Kate (CRT) [redacted]; Patel, Sanjay (CRT) [redacted]; Fitzgerald, Paige (CRT) [redacted]
Subject: MD Florida FACE Indictment (1/18)

Greetings,

Attached please find a draft press release for *U.S. v. Freestone et al*. We expect to present this indictment tomorrow Wednesday January 18, 2023. We do not yet know when the indictment will be unsealed. The trial team will keep us up to update. This matter is being prosecuted by Laura-Kate Bernstein and Sanjay Patel from the Criminal Section in partnership with the USAO in the Middle District of Florida.

Please let us know if you have questions.

Thanks!

Rose Gibson
Deputy Chief, Criminal Section
Civil Rights Division
U.S. Department of Justice
[redacted]
She/her/hers

EXHIBIT 014

From: "Weiner, Robert (CRT)" <[redacted]>
To: "Clarke, Kristen (CRT)" <[redacted]>
Cc: "Moossy, Robert (CRT)" <[redacted]>
Subject: FACE Act -- Pregnancy Resource Center Press Release
Date: Tue, 17 Jan 2023 15:08:30 -0500
Importance: Normal
Attachments: MDFL_Freestone_and_SmithnStewart_Press_Release_RG_jf_OPA.docx

---

Kristen,

Attached is a press release for indictment expected tomorrow of a two Florida people for vandalizing a pregnancy resource center, one of the "pro-life" facilities that counsel patients to pursue alternatives to abortion. The defendants vandalized three facilities in Florida with spray painted threats such as, "If abortions aren't safe than niether [*sic*] are you." "YOUR TIME IS UP!!," "WE'RE COMING for U," and "We are everywhere."

The defendants are accused of using threats of force to intimidate and interfere with the employees of a reproductive health facility and intentionally damaging and destroying the facility's property because the employees and the facility were providing reproductive health services. The charges include FACE Act violations and conspiracy.

I proposed adding the words, "That Provide Abortion Alternatives," at the end of the headline, which Aryele prefers. CRM prefers Aryele's alternative initial suggestion of "Two Defendants Indicted for Civil Rights Conspiracy and FACE Act Offenses Targeting Pregnancy Resource Centers."

I'm fine either way, so long as we make clear in the headline that this case deals with anti-abortion centers.

Aryele thinks Department leadership should also review this release.

The text of the release is reproduced below. Please let me know if you have any changes or questions.

Thanks.

Have a good trip back.

Rob

Two Defendants Indicted for Civil Rights Conspiracy and FACE Act Offenses Targeting Reproductive Health Services Facilities That Provide Abortion Alternatives

WASHINGTON – Two Florida residents were indicted for federal offenses in connection with the alleged vandalism of reproductive health services facilities in the state.

The indictment, returned by a federal grand jury in the Middle District of Florida, alleges that Caleb Freestone, 27, and Amber Smith-Stewart, 23, engaged in a conspiracy to prevent employees of reproductive health services facilities from providing those services. According to the indictment, as part of the conspiracy, the defendants targeted reproductive health services facilities that provide abortion alternatives and vandalized those facilities with spray-painted threats. According to the indictment, Freestone and Smith-Stewart, and other co-conspirators, are alleged to have spray painted threats, including "If abortions aren't safe than niether [sic] are you," "YOUR TIME IS UP!!," "WE'RE COMING for U," and "We are everywhere" on a reproductive health services facility

in [redacted], Florida. The indictment further alleges that facilities in [redacted], Florida and [redacted], Florida were also targeted.
The indictment also alleges that Freestone and Smith-Stewart violated the FACE Act by using threats of force to intimidate and interfere with the employees of a reproductive health services facility in [redacted] because those employees were providing or seeking to provide reproductive health services. The indictment further alleges that Freestone and Smith-Stewart violated the FACE Act by intentionally damaging and destroying the facility's property because the facility provides reproductive health services.

If convicted of the offenses, Freestone and Smith-Stewart each face up to a maximum of 12 years in prison, three years of supervised release and fines of up to $350,000.

Assistant Attorney General Kristen Clarke of the Justice Department's Civil Rights Division, U.S. Attorney Roger B. Handberg for the Middle District of Florida and [INSERT FBI SAC] made the announcement.

The FBI Tampa Field Office investigated the case.

Assistant U.S. Attorney Lisa Tbelwell for the Middle District of Florida and Trial Attorneys Sanjay Patel and Laura-Kate Bernstein of the Civil Rights Division's Criminal Section are prosecuting the case.

Anyone who has information about incidents of violence, threats, and obstruction that target a patient or provider of reproductive health services, or damage and destruction of reproductive health care facilities, should report that information to the FBI at www.tips.fbi.gov. For more information about clinic violence, and the Department of Justice's efforts to enforce FACE Act violations, please visit www.justice.gov/crt/national-task-force-violence-against-reproductive-health-care-providers.

An indictment is merely allegation. All defendants are presumed innocent until proven guilty beyond a reasonable doubt in a court of law.

EXHIBIT 015

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "[redacted]@usccb.org" <[redacted]@usccb.org>
Subject: FYI
Date: Wed, 25 Jan 2023 12:00:01 -0500
Importance: Normal

Mr. Balserak,

I wanted to bring this matter to your attention. Thank you for your work.

Two Defendants Indicted for Civil Rights Conspiracy and FACE Act Offenses Targeting Pregnancy Resource Centers | OPA | Department of Justice

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

EXHIBIT 016

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "Dan Balserak" <[redacted]@usccb.org>
Cc: "Anthony Granado" <[redacted]@usccb.org>, "Michelle Gress" <[redacted]@usccb.org>, "William Quinn" <[redacted]@usccb.org>, "Michael Moses" <[redacted]@usccb.org>
Subject: Update
Date: Fri, 13 Sep 2024 15:02:28 -0400
Importance: Normal

Director Balserak,

I am writing to flag an announcement regarding our ongoing efforts to address issues facing pregnancy resource centers. As always, please be in contact with the Justice Department at any time regarding these issues. A core principle underlying the Justice Department's enforcement of the FACE Act is that violence or threats of violence against patients or providers of reproductive health services is simply unacceptable. The Department will continue enforcing the Act evenhandedly to protect the rights of *all* patients and *all* providers, including pregnancy resource centers.

Office of Public Affairs | Florida Man Sentenced for Civil Rights Conspiracy Targeting Pregnancy Resource Centers | United States Department of Justice

Thanks to you and your colleagues for your work.

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

EXHIBIT 017

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "[redacted]@heartbeatinternational.org" <[redacted]@heartbeatinternational.org>
Subject: New Matter
Date: Sat, 09 Dec 2023 11:32:30 -0500
Importance: Normal

President Godsey:

I am writing to inform you that a defendant in U.S. District Court for the Northern District of Ohio pled guilty plea yesterday to a violation of the FACE Act for attacking a pregnancy resource center. In her plea, Whitney M. Durant admitted that on April 15, 2023, she used spray paint to vandalize a pregnancy resource center, HerChoice, in Bowling Green, Ohio. Ms. Durant could receive up to a year in prison for her offense. The sentencing will occur at a later date. You can find further detail regarding this development here: Office of Public Affairs | Ohio Woman Pleads Guilty to Freedom of Access to Clinic Entrances (FACE) Act Violation for Damaging Pregnancy Center | United States Department of Justice

As I have previously said, the key principle underlying Justice Department's enforcement of the FACE Act is that violence or threats of violence against patients or providers of reproductive health services is unacceptable. The Department will enforce the Act evenhandedly to protect the rights of *all* patients and *all* providers, including pregnancy resource centers.

If you or your colleagues or members at Heartbeat International have information about incidents of violence, threats, or obstruction that target a patient or provider of reproductive health services or about efforts to damage reproductive health care facilities, please encourage them to report that information to the FBI at www.tips.fbi.gov. Providers needing assistance in enhancing the security of their facilities should visit Civil Rights Division | Security Recommendations to Enhance the Safety and Protection of Providers (justice.gov) or contact their local FBI Field Office.

And, of course, if you or any of your colleagues or members face imminent danger, call 911.

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

EXHIBIT 018

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "[redacted]@usccb.org" <[redacted]@usccb.org>
Subject: Important Development
Date: Sat, 09 Dec 2023 1d:22:24 -0500
Importance: Normal

Dear Mr. Balserak:

I am writing to inform you that a defendant in U.S. District Court for the Northern District of Ohio pled guilty plea yesterday to a violation of the FACE Act for attacking a pregnancy resource center. In her plea, Whitney M. Durant admitted that on April 15, 2023, she used spray paint to vandalize a pregnancy resource center, HerChoice, in Bowling Green, Ohio. Ms. Durant could receive up to a year in prison for her offense. The sentencing will occur at a later date. You can find further detail regarding this development here: Office of Public Affairs | Ohio Woman Pleads Guilty to Freedom of Access to Clinic Entrances (FACE) Act Violation for Damaging Pregnancy Center | United States Department of Justice

As I have previously said, the key principle underlying Justice Department's enforcement of the FACE Act is that violence or threats of violence against patients or providers of reproductive health services is unacceptable. The Department will enforce the Act evenhandedly to protect the rights of *all* patients and *all* providers, including pregnancy resource centers.

If you or your colleagues or members have information about incidents of violence, threats, or obstruction that target a patient or provider of reproductive health services or about efforts to damage reproductive health care facilities, please encourage them to report that information to the FBI at www.tips.fbi.gov. Providers needing assistance in enhancing the security of their facilities should visit Civil Rights Division | Security Recommendations to Enhance the Safety and Protection of Providers (justice.gov) or contact their local FBI Field Office.

And, of course, if you or any of your colleagues or members face imminent danger, call 911.

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

EXHIBIT 019

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "[redacted]@nifla.org" <[redacted]@nifla.org>
Subject: New Matter
Date: Sat, 09 Dec 2023 11:26:05 -0500
Importance: Normal

Mr. Glessner:

I am writing to inform you that a defendant in U.S. District Court for the Northern District of Ohio pled guilty plea yesterday to a violation of the FACE Act for attacking a pregnancy resource center. In her plea, Whitney M. Durant admitted that on April 15, 2023, she used spray paint to vandalize a pregnancy resource center, HerChoice, in Bowling Green, Ohio. Ms. Durant could receive up to a year in prison for her offense. The sentencing will occur at a later date. You can find further detail regarding this development here: Office of Public Affairs | Ohio Woman Pleads Guilty to Freedom of Access to Clinic Entrances (FACE) Act Violation for Damaging Pregnancy Center | United States Department of Justice

As I have previously said, the key principle underlying Justice Department's enforcement of the FACE Act is that violence or threats of violence against patients or providers of reproductive health services is unacceptable. The Department will enforce the Act evenhandedly to protect the rights of *all* patients and *all* providers, including pregnancy resource centers.

If you or your colleagues or members at NIFLA have information about incidents of violence, threats, or obstruction that target a patient or provider of reproductive health services or about efforts to damage reproductive health care facilities, please encourage them to report that information to the FBI at www.tips.fbi.gov. Providers needing assistance in enhancing the security of their facilities should visit Civil Rights Division | Security Recommendations to Enhance the Safety and Protection of Providers (justice.gov) or contact their local FBI Field Office.

And, of course, if you or any of your colleagues or members face imminent danger, call 911.

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

EXHIBIT 020

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "Roland Warren" <[redacted]@care-net.org>
Cc: "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: [EXTERNAL] Re: New Development
Date: Wed, 13 Dec 2023 15:59:40 -0500
Importance: Normal
Inline-Images: ~WRD0000.jpg

President Warren,

Thank you for your response. I am connecting you with Sanjay Patel who I know the organization has been in touch with concerning your request for an update on outstanding cases.

I look forward to remaining in touch,

Kristen Clarke
Assistant Attorney General
Civil Rights Division

From: Roland Warren [redacted]@care-net.org>
Sent: Saturday, December 9, 2023 9:44 PM
To: Clarke, Kristen (CRT) <[redacted]>
Subject: [EXTERNAL] Re: New Development

Ms. Clarke,

Thank you for making me aware of this. I appreciate the DOJ holding this woman accountable for her actions. That said, as you know, there have been many attacks on pregnancy centers, including firebombings. I am hopeful that these perpetrators will be prosecuted as well. Is there a way that we can get a more comprehensive update on outstanding cases?

Best regards,
Roland
Roland C. Warren
President & CEO

[redacted]
V: [redacted] F: [redacted]
E: [redacted] W: care-net.org

On Sat, Dec 9, 2023 at 11:23 AM Clarke, Kristen (CRT) <[redacted]> wrote:

> Dear Mr. Warren:
>
> I am writing to inform you that a defendant in U.S. District Court for the Northern District of Ohio pled guilty plea yesterday to a violation of the FACE Act for attacking a pregnancy resource center. In her plea, Whitney M. Durant admitted that on April 15, 2023, she used spray paint to vandalize a pregnancy resource center, HerChoice, in Bowling Green, Ohio. Ms. Durant could receive up to a year in prison for her offense. The sentencing will occur at a later date. You can find further detail regarding this development here: Office of Public Affairs | Ohio Woman Pleads Guilty to Freedom of Access to Clinic Entrances (FACE) Act Violation for Damaging Pregnancy Center | United States Department of Justice
>
> As I have previously said, the key principle underlying Justice Department's enforcement of the FACE Act is that violence or threats of violence against patients or providers of reproductive health services is unacceptable. The Department will enforce the Act evenhandedly to protect the rights of *all* patients and *all* providers, including pregnancy resource centers.
>
> If you or your colleagues or members have information about incidents of violence, threats, or obstruction that target a patient or provider of reproductive health services or about efforts to damage reproductive health care facilities, please encourage them to report that information to the FBI at www.tips.fbi.gov. Providers needing assistance in enhancing the security of their facilities should visit Civil Rights Division | Security Recommendations to Enhance the Safety and Protection of Providers (justice.gov) or contact their local FBI Field Office.
>
> And, of course, if you or any of your colleagues or members face imminent danger, call 911.
>
> Kristen Clarke
> Assistant Attorney General
> Civil Rights Division
> U.S. Department of Justice

EXHIBIT 021

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "[redacted]@usccb.orgd" <[redacted]@usccb.org>
Subject: FYI
Date: Fri, 20 Dec 2024 22:37:52 -0500
Importance: Normal

Mr. Balserak,

I am writing to flag a new development in one of our cases concerning a pregnancy resource center in Florida. Please see below. The Justice Department will continue to ensure access to the full spectrum of reproductive health services afforded to the public, whether those services include abortion or counseling on alternatives to abortion.

Office of Public Affairs | Florida Woman Convicted of Civil Rights Conspiracy Targeting Pregnancy Resource Centers | United States Department of Justice

If you or your colleagues or members at Heartbeat International have information about incidents of violence, threats, or obstruction that target a patient or provider of reproductive health services or about efforts to damage reproductive health care facilities, please encourage them to report that information to the FBI at www.tips.fbi.gov. Providers needing assistance in enhancing the security of their facilities should visit Civil Rights Division | Security Recommendations to Enhance the Safety and Protection of Providers (justice.gov) or contact their local FBI Field Office.

As always, if you or any of your colleagues or members face imminent danger, call 911.

Thank you for your leadership and advocacy.

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

EXHIBIT 022

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "[redacted]nifla.org" <[redacted]@nifla.org>
Subject: FYI
Date: Fri, 20 Dec 2024 22:37:02 -0500
Importance: Normal

Mr. Glessner,

I am writing to flag a new development in one of our cases concerning a pregnancy resource center in Florida. Please see below. The Justice Department will continue to ensure access to the full spectrum of reproductive health services afforded to the public, whether those services include abortion or counseling on alternatives to abortion.

Office of Public Affairs | Florida Woman Convicted of Civil Rights Conspiracy Targeting Pregnancy Resource Centers | United States Department of Justice

If you or your colleagues or members at Heartbeat International have information about incidents of violence, threats, or obstruction that target a patient or provider of reproductive health services or about efforts to damage reproductive health care facilities, please encourage them to report that information to the FBI at www.tips.fbi.gov. Providers needing assistance in enhancing the security of their facilities should visit Civil Rights Division | Security Recommendations to Enhance the Safety and Protection of Providers (justice.gov) or contact their local FBI Field Office.

And, of course, if you or any of your colleagues or members face imminent danger, call 911.

Thank you for your leadership and advocacy.

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

EXHIBIT 023

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "[redacted]@heartbeatinternational.org" <[redacted]@heartbeatinternational.org>
Subject: FYI
Date: Fri, 20 Dec 2024 22:35:32e0500
Importance: Normal

President Godsey:

I am writing to flag a new development in one of our cases concerning a pregnancy resource center in Florida. Please see below. The Justice Department will continue to ensure access to the full spectrum of reproductive health services afforded to the public, whether those services include abortion or counseling on alternatives to abortion.

Office of Public Affairs | Florida Woman Convicted of Civil Rights Conspiracy Targeting Pregnancy Resource Centers | United States Department of Justice

If you or your colleagues or members at Heartbeat International have information about incidents of violence, threats, or obstruction that target a patient or provider of reproductive health services or about efforts to damage reproductive health care facilities, please encourage them to report that information to the FBI at www.tips.fbi.gov. Providers needing assistance in enhancing the security of their facilities should visit Civil Rights Division | Security Recommendations to Enhance the Safety and Protection of Providers (justice.gov) or contact their local FBI Field Office.

And, of course, if you or any of your colleagues or members face imminent danger, call 911.

Thank you for your leadership and advocacy.

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

EXHIBIT 024

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "[redacted]@care-net.org" <[redacted]@care-net.org>
Subject: FYI
Date: Fri, 20 Dec 2024 22:34:20 -0500
Importance: Normal

President Warren,

I am writing to flag a new development in one of our cases concerning a pregnancy resource center in Florida. Please see below. The Justice Department will continue to ensure access to the full spectrum of reproductive health services afforded to the public, whether those services include abortion or counseling on alternatives to abortion.

Office of Public Affairs | Florida Woman Convicted of Civil Rights Conspiracy Targeting Pregnancy Resource Centers | United States Department of Justice

Thank you for your leadership and advocacy,

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

EXHIBIT 025

From: "Patel, Sanjay(CRT)" <[redacted]>
To: Roland Warren <[redacted]@care-net.org>
Cc: Dan Balserak <[redacted]@usccb.org>, "[redacted]@usccb.org" <[redacted]@usccb.org>, "[redacted]@usccb.org" <[redacted]@usccb.org>, Michelle Gress <[redacted]@usccb.org>, Vince DiCaro <[redacted]@care-net.org>, [redacted]@care-net.org" <[redacted]@care-net.org>, "[redacted]@nifla.org" <[redacted]@nifla.org>, Tom Glessner <[redacted]>, "[redacted]@nifla.org" <[redacted]@nifla.org>, [redacted]@hearbeatinternational.org" <[redacted]@hearbeatinternational.org>, "Trudden, Andrea" [redacted]@heartbeatinternational.org>, [redacted]@heartbeatinternational.org" [redacted]@heartbeatinternational.org>, Danielle White [redacted]@heartbeatinternational.org>, "Taskforce, Clinicviolence (CRT)" <[redacted]>, "Channapati, Anita (CRT)" <[redacted]>
Subject: RE: [EXTERNAL] Re: FL defendants sentenced for targeting pregnancy resource centers
Date: Wed, 16 Oct 2024 08:21:32e0400
Iuline-Images: ~WRD0002.jpg

[EXTERNAL EMAIL] DO NOT CLICK links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Roland –
Your request for a report and FACE Act prosecution listing would have to be routed through the Department's Freedom of Information Act Unit (FOIA).
I'm including a link below where you can submit the request.
At our meeting, Anita and I can share with you some general information about the Department's FACE Act prosecutions following *Dobbs*, including those brought against defendants who targeted pro-life facilities.
Best,
SP

https://www.justice.gov/oip/make-foia-request-doj

From: Roland Warren <[redacted]>
Sent: Tuesday, October 15, 2024 7:40 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Dan Balserak <[redacted]@usccb.org>; [redacted]@usccb.org; [redacted]@usccb.org; Michelle Gress <[redacted]@usccb.org>; Vince DiCaro <[redacted]@care-net.org>; [redacted]@care-net.org; [redacted]@nifla.org; Tom Glessner <[redacted]>; [redacted]@nifla.org; [redacted]@hearbeatinternational.org; Trudden, Andrea <[redacted]@heartbeatinternational.org>; [redacted]@heartbeatinternational.org; Danielle White <[redacted]@heartbeatinternational.org>; Taskforce, Clinicviolence (CRT) <[redacted]>; Channapati, Anita (CRT) <[redacted]>
Subject: Re: [EXTERNAL] Re: FL defendants sentenced for targeting pregnancy resource centers

Sanjay,
Thanks for your willingness to meet to discuss this. However, to ensure that this meeting is fact-based and a good use of time, I would like to see a report regarding the enforcement of the FACE Act since the overturning of Roe. Specifically, I would like to see a listing of charges/convictions sorted by those charged related to pro-life facilities and those related to abortion facilities. Moreover, I would like a description of the charges and, if convicted or not, and the resulting sentence. Please advise.

Thanks,
Roland

Roland C. Warren
President & CEO

[redacted]
V: [redacted] F [redacted]
E: [redacted] W: care-net.org

[redacted]

On Sun, Sep 15, 2024 at 2:12 PM Patel, Sanjay (CRT) <[redacted]> wrote:

> Hello, Roland –
> I really appreciate your email, and would invite you to discuss the concerns you raised.
> There are many distinguishing factors that account for any sentence imposed by a federal court judge.
> The case you mentioned, like others, are quite distinguishable from each other, and from the Freestone case that I shared with you.
> I'm happy to convene a meeting to discuss.
> Please let me know what date/time works best for you.
> Best,
> Sanjay
>
> **From:** Roland Warren<[redacted]@care-net.org>
> **Sent:** Friday, September 13, 2024 10:30 PM
> **To:** Patel, Sanjay (CRT) <[redacted]>
> **Cc:** Dan Balserak <[redacted]>; [redacted]@usccb.org; [redacted]@usccb.org; Michelle Gress <[redacted]@usccb.org>; Vince DiCaro <[redacted]@care-net.org>; [redacted]; [redacted]@nifla.org; Tom Glessner <[redacted]; [redacted]@nifla.org; [redacted]@heartbeatinternational.org; Trudden, Andrea [redacted]heartbeatinternational.org>; [redacted]@heartbeatinternational.org; Danielle White [redacted]@heartbeatinternational.org>; Taskforce, Clinicviolence (CRT) <[redacted]>; Channapati, Anita (CRT) <[redacted]>
> **Subject:** [EXTERNAL] Re: FL defendants sentenced for targeting pregnancy resource centers
>
> Sanjay,
>
> Thank you for the update. However, I would be remiss if I did not point out that pro-choice activists doing acts that violate the FACE Act are getting significantly less severe punishment than pro-life

people. A case in point is the treatment of Paulette Harlow, a 75 year old woman who was praying in a DC abortion clinic. She was sentenced to 24 months in prison. Others with her received similarly severe treatment: Harlow's sister Jean Marshall, 74, was sentenced to 24 months in prison. Also sentenced: Heather Idoni, 59 (24 months in prison); Lauren Handy, 30; John Hinshaw, 69; William Goodman, 54 (27 months in prison); Joan Bell, 76 (27 months in prison); and Herb Geraghty, 27 (27 months in prison). There are many other cases with similar and longer sentences given to pro-life people for violating the FACE Act.

The bottom line is that there appears to be a double standard in these cases and not equal treatment under the law. So, I would like to know why this is happening and what will be done to deal with the seemingly biased administration of the law.

Regards,
Roland
Roland C. Warren
President & CEO

[redacted]
V: [redacted] F: [redacted]
E: [redacted] W: care-net.org

[redacted]

On Fri, Sep 13, 2024 at 8:26 AM Patel, Sanjay (CRT) <[redacted]> wrote:

> Alle-
> I hope this email finds you well.
> Passing along an update about the Department's Florida prosecution against defendants who targeted pregnancy resource centers throughout the state.
> In June, I shared news that three of the four defendants charged had pleaded guilty to felony civil rights offenses for their involvement in vandalizing these clinics with threatening graffiti.
> Yesterday, those three defendants were sentenced in federal court.
> More information about that is available here:
>
> Office of Public Affairs | Florida Man Sentenced for Civil Rights Conspiracy Targeting Pregnancy Resource Centers | United States Department of Justice
>
> Regardless of viewpoint, the Department is committed to prosecuting anyone who uses violence to violate access to reproductive health care.
> Such conduct will not be tolerated, and the Department will vigorously prosecute those who violate civil rights, which includes access to reproductive health care free from violence and obstruction.
>
> Please feel free to contact me or my partner, Anita Channapati (cc'd) should the need arise.

Best,
Sanjay

Sanjay Patel
Director
National Task Force on Violence Against Reproductive Health Care Providers
U.S. Department of Justice
Civil Rights Division
Washington, D.C.
[redacted]
https://www.justice.gov/crt/national-task-force-violence-against-reproductive-health-care-providers

EXHIBIT 026

From: "Karlan, Pamela (CRT)" <[redacted]>
To: "Felte, James (CRT)" <[redacted]>, "Fitzgerald, Paige (CRT)" <[redacted]>
Cc: "Sooknanan, Sparkle (OASG)" <[redacted]>, "Grogg, Adam (OASG)" <[redacted]>, "Moossy, Robert (CRT)" <[redacted]>, "Friel, Gregory B (CRT)" <[redacted]>, "Smith, Johnathan (CRT)" <[redacted]>, "Calderon, Tovah R (CRT)" <[redacted]>, "Cochran, Shaylyn (CRT)" <[redacted]>, "Clarke, Kristen (CRT)" <[redacted]>
Subject: Texas and the FACE Act
Date: Thu, 02 Sep 2021 10:28:13 -0400
Importance: Normal

Dear Jim and Paige,

Sparkle and Adam from OASG came to me to say that the AG raised the possibility at the morning leadership meeting whether DOJ should put out some kind of statement or letter today reminding everyone and reassuring clinics that the FACE Act is there. I'm not sure exactly what he's looking for, but thought you might be the right person to discuss this with them because of CRM's FACE Act work. I'm looping in the other DAAGs (I'm coming straight to you in CRM, because Robert may be offline this morning.)

So now that I've connected everyone, I fear I'll be out of pocket shortly for my trip to the backcountry. But I'll be able to check email for another hour or so if something comes up.

Take care,

Pam

Pamela S. Karlan
Principal Deputy Assistant Attorney General
Civil Rights Division
U.S Department of Justice
[redacted] (mobile)

EXHIBIT 027

Event: HOLD-- Calls to NGOs, Marshall Service & TX US Attys

Start Date: 2021-09-02 16:00:00 -0400

End Date: 2021-09-02 17:00:00 -0400

Organizer: Clarke, Kristen (CRT) <[redacted]>

Class: X-PERSONAL

Date Created: 2024-10-10 09:42:40 -0500

Date Modified: 2024-10-10 09:42:40 -0500

Priority: 5

EXHIBIT 028

From: "Clarke, Kristen (CRT)" <[redacted]>
To:t" [redacted]@ppfa.org" <[redacted]@ppfa.org>
Subject: FACE Act Compliance
Date: Thu, 02 Sep 2021 18:01:56 -0400
Importance: Normal

Alexis,

I wanted to connect with you briefly regarding the situation in Texas. Note that we are on high alert when it comes to ensuring freedom of access to clinics; we are committed to using the FACE Act to hold accountable those who may seek to obstruct access to clinics.

Please call me at your convenience. I can be reached at [redacted].

Kristen

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice
Tel: [redacted]

EXHIBIT 029

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "[redacted]" <[redacted]>, "[redacted]. (CID) (FBI)" <[redacted]>, "[redacted]. (CTD) (FBI)" <[redacted]>, "[redacted]. (CTD) (FBI)" <[redacted]>
Subject: RE: FACE ACT TF Meeting
Date: Wed, 04 May 2022 08:08:23 -0400
Importance: Normal

Good morning, [redacted] –
Apologies for the delay responding (I've been in transit bw cities for work).
You read my mind, and I was planning to convene a meeting of the TF only to discuss potential fallout before any larger meeting with providers, which I suspect will be loaded with questions.
I'll send an invite out shortly for a meeting Friday morning.
SP

From: [redacted] <[redacted]>
Sent: Tuesday, May 3, 2022 11:37 AM
To: Patel, Sanjay (CRT)i<[redacted]>; [redacted]. (CID) (FBI)i<[redacted]>;i[redacted]. (CTD) (FBI)i<[redacted]>;i[redacted] (CTD) (FBI)i<[redacted]>
Subject: FACE ACT TF Meeting

Sanjay,

On our last FACE Act Task Force meeting in March, you indicated you wanted to host a NGO Security Director meeting for late April, early May. In light of everything going on, it seems like a good opportunity to touch base and get ahead of any would-be threats. Do you still plan to set up a call? If so, when?

Thank you!

[redacted]
Unit Chief
CTD/DTOS/Northeast
[redacted] (Cell)
[redacted] (Desk)

EXHIBIT 030

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Cowall, Laura (CRT)" <[redacted]>, "Smith, Katelyn (CRT)" <[redacted]>, "Goddard, Lauren (NSD)" <[redacted]>, "McCracken, Brice P." <[redacted]>, "Jablonski, Daniel (USMS)" <[redacted]>, "[redacted] (CID) (FBI)" <[redacted]>, "[redacted] (CTD) (FBI)" <[redacted]>, "[redacted] (CTD) (FBI)" <[redacted]>, "[redacted] (CTD) (FBI)" <[redacted]>, "[redacted]@uspis.gov" <[redacted]@uspis.gov>, "Brandt, Robert (USMS)" <[redacted]>
Subject: Clinic Violence Task Force meeting
Date: Wed, 04 May 2022 09:52:20 -0400
Importance: Normal
Attachments: unnamed

Given the leaked SCOTUS opinion, I would like to convene a meeting to discuss questions/concerns I've been receiving from the provider community and our local federal partners.
This meeting will be TF only, and not include any providers or NGOs.
This is very short notice, and I understand if some of you are unavailable.
If you cannot make it, please let me know if there are any topics/concerns you believe the TF should discuss.
Thank you,
Sanjay

Microsoft Teams meeting

Join on your computer or mobile app
[redacted]

Or call in (audio only)
[redacted]

Phone Conference ID: [redacted]
Find a local number | Reset PIN

Learn More | Meeting options

EXHIBIT 031

From: "Felte, James (CRT)" <[redacted]>

To: "Patel, Sanjay (CRT)" <[redacted]>, "Taskforce, Clinicviolence (CRT)" <[redacted]>, "Fitzgerald, Paige (CRT)" <[redacted]>, "Smith, Katelyn (CRT)" <[redacted]>, "Goddard, Lauren (NSD)" <[redacted]>, "[redacted] (CID) (FBI)" <[redacted]>, "Brandt, Robert (USMS)" <[redacted]>, "Jablonski, Daniel (USMS)" <[redacted]>, "[redacted]@uspis.gov" <[redacted]@uspis.gov>, "[redacted] (CTD) (FBI)" <[redacted]>, "[redacted] (CTD) (FBI)" <[redacted]>, "[redacted](FBI)" <[redacted]>, Michelle Davidson <[redacted]@prochoice.org>, "duVergne Gaines" <[redacted]@feminist.org>, "Noah, Krista" <[redacted]@ppfa.org>, "Wester, John E." <[redacted]>, "[redacted]@ppfa.org" <[redacted]@ppfa.org>, Melissa Fowler <[redacted]@prochoice.org>, "[redacted]@ppfa.org" <[redacted]@ppfa.org>, "[redacted]@ppfa.org" <[redacted]@ppfa.org>, Kathy Spillar <[redacted]@feminist.org>, "Elizabeth Wilson" <[redacted]@feminist.org>, "[redacted] (CTD) (FBI)" <[redacted]>, Robert Ledogar <[redacted]@prochoice.org>, "Hughes, Timothy (USMS)" <[redacted]>, "[redacted] (CTD) (FBI)" <[redacted]>, "[redacted](CTD) (FBI)" <[redacted]>, Ellie Smeal <[redacted]@feminist.org>, Eduardo Serrano <[redacted]@prochoice.org.>, "Moossy, Robert (CRT)" <[redacted]>, "Cowall, Laura (CRT)" <[redacted]>, "Fitzgerald, Paige (CRT)" <[redacted]>

Subject: FW: Attorney General Merrick B. Garland Statement on Supreme Court Ruling in Dobbs v. Jackson Women's Health Organization

Date: Fri, 24 Jun 2022 16:36:15 -0400

Importance: Normal

All,

In light of the Supreme Court's ruling today in *Dobbs*, I wanted to share the below statement from Attorney General Garland.

Jim Felte
Chief, Criminal Section
Civil Rights Division
U.S. Department of Justice

The United States Department of Justice

FOR IMMEDIATE RELEASE
WWW.JUSTICE.GOV/NEWS

June 24, 2022

Attorney General Merrick B. Garland Statement on Supreme Court Ruling in Dobbs v. Jackson Women's Health Organization

WASHINGTON – Attorney General Merrick B. Garland today released the following statement following the Supreme Court's decision in *Dobbs, State Health Officer of the Mississippi Department of Health, et al. v. Jackson Women's Health Organization et al.:*

"Today, the Supreme Court overturned *Roe v. Wade* and *Planned Parenthood v. Casey* and held that the right to abortion is no longer protected by the Constitution.

"The Supreme Court has eliminated an established right that has been an essential component of women's liberty for half a century – a right that has safeguarded women's ability to participate fully and equally in society. And in renouncing this fundamental right, which it had repeatedly recognized and reaffirmed, the Court has upended the doctrine of *stare decisis*, a key pillar of the rule of law.

"The Justice Department strongly disagrees with the Court's decision. This decision deals a devastating blow to reproductive freedom in the United States. It will have an immediate and irreversible impact on the lives of people across the country. And it will be greatly disproportionate in its effect – with the greatest burdens felt by people of color and those of limited financial means.

***

"But today's decision does not eliminate the ability of states to keep abortion legal within their borders. And the Constitution continues to restrict states' authority to ban reproductive services provided outside their borders.

"We recognize that traveling to obtain reproductive care may not be feasible in many circumstances. But under bedrock constitutional principles, women who reside in states that have banned access to comprehensive reproductive care must remain free to seek that care in states where it is legal. Moreover, under fundamental First Amendment principles, individuals must remain free to inform and counsel each other about the reproductive care that is available in other states.

"Advocates with different views on this issue have the right to, and will, voice their opinions. Peacefully expressing a view is protected by the First Amendment. But we must be clear that violence and threats of violence are not. The Justice Department will not tolerate such acts.

***

"The Justice Department will work tirelessly to protect and advance reproductive freedom.

"Under the Freedom of Access to Clinic Entrances Act, the Department will continue to protect healthcare providers and individuals seeking reproductive

health services in states where those services remain legal. This law prohibits anyone from obstructing access to reproductive health services through violence, threats of violence, or property damage.

"The Department strongly supports efforts by Congress to codify Americans' reproductive rights, which it retains the authority to do. We also support other legislative efforts to ensure access to comprehensive reproductive services.

"And we stand ready to work with other arms of the federal government that seek to use their lawful authorities to protect and preserve access to reproductive care. In particular, the FDA has approved the use of the medication Mifepristone. States may not ban Mifepristone based on disagreement with the FDA's expert judgment about its safety and efficacy.

"Furthermore, federal agencies may continue to provide reproductive health services to the extent authorized by federal law. And federal employees who carry out their duties by providing such services must be allowed to do so free from the threat of liability. It is tbe Department's longstanding position that States generally may not impose criminal or civil liability on federal employees who perform their duties in a manner authorized by federal law. Additionally, the Department's Office of Legal Counsel has determined that federal employees engaging in such conduct would not violate the Assimilative Crimes Act and could not be prosecuted by the federal government under that law. The Justice Department is prepared to assist agencies in resolving any questions about the scope of their authority to provide reproductive care.

***

"The ability to decide one's own future is a fundamental American value, and few decisions are more significant and personal than the choice of whether and when to have children.

"Few rights are more central to individual freedom tban the right to control one's own body.

"The Justice Department will use every tool at our disposal to protect reproductive freedom. And we will not waver from this Department's founding responsibility to protect the civil rights of all Americans."

###

OAG

22-663

Do not reply to this message. If you have questions, please use the contacts in the message or call the Office of Public Affairs at 202-514-2007.

EXHIBIT 032

From: "Weiner, Robert (CRT)" <[redacted]>
To: "Bond, Rebecca (CRT)" <[redacted]>, "Clarke, Kristen (CRT)" <[redacted]>
Subject: RE: Leadership Conference Meeting on Reproductive Rights
Date: Mon, 25 Jul 2022 21:45:10 -0400
Importance: Normal

The speakers uniformly expressed gratitude for DOJ's strong commitment to reproductive rights, to a point that Maya Wiley asked them to dispense with the thanks because it was taking up too much time.

The AG, DAG and Associate all spoke. Vanita said that you wanted to be there but you were in transit. She point out that CRT was represented in the meeting. All three DOJ speakers referred to the post-*Dobbs* response as a core civil rights issue. I will focus primarily on what the groups had to say, with some indication of DOJ responses, but I can provide further readout of the leadership statements if you want.

The speakers from the groups hewed fairly closely to the agenda.

[redacted] **of NARAL Pro-Choice America** asked about the Task Force and how the groups could stay connected to DOJ's work. Vanita identified Jodie Moore as the point of contact and said that there would be a series of calls with different collections of the groups.

[redacted] **of Planned Parenthood** reported that they had seen increased harassment of providers. She is grateful for our FACE Act enforcement and the local briefings we have done. She said that there needed to be more trainings of local law enforcement, and the FACE Act needed to extend to all sorts of threats, including cybersecurity and doxing. She also noted that there was a tremendous influx of patients into states where abortion is legal. She said it was important to ensure patients have the right to travel. The AG responded that the right to travel is "core" and is protected by multiple constitutional provisions. He referred to the upcoming pro bono convening as a way to get representation for women whose rights are infringed.

[redacted] **of the National Health Law Project** acknowledged our issuance of the 1557 NPRM. She also said that federal law requires states to provide abortions that fall within the Hyde Amendment exceptions, but that states were not complying even before *Dobbs*. Recognizing the litigation risks, she urged DOJ and HHS to pursue those issues.

[redacted] **of the National Women's Law Center** focused primarily on whether the Administration would declare a medical emergency under the PREP Act (Public Readiness and Emergency Preparedness Act) to deal with the crisis in access to abortion. HHS could use the PREP Act to require that states not interfere with the use of medication abortions as a way to ameliorate the crisis. The AG said that DOJ was advising HHS on the issue, but he could not disclose the substance of our advice. There was no pushback on that point, but Maya Wiley added that the groups wanted DOJ to be aggressive and to take risks in dealing with the crisis.

[redacted] **of the Center for Reproductive Rights** said that there were three dozen pending abortion rights cases, and that states were trying to claw back rights previously granted.

[redacted] **of the National Action Network** expressed concerns about the criminalization of abortion, but said they would discuss the issue in more detail with the DOJ Task Force.

[redacted] **of the National Latina Institute for Reproductive Justice** expressed concern about abortion rights for immigrants. They are unable to travel to get healthcare. Moreover, immigrants are concerned that DHS will treat abortion convictions as grounds for deportation. The DAG said that she had held a quarterly meeting with immigration rights groups earlier in the day and was focused on the problem. Vanita said she would flag the issue as an area of concern in the interagency task force. Rodriguez also expressed concern about vigilante actions against immigrants under

SB8. She said that there was potential for communities of color to be targeted under such statutes. The AG said that the absence of judicial review enabled discrimination in enforcement and was incompatible with the rule of law.

[redacted] **of the National Action Network** pointed out that blacks were more likely to be criminally prosecuted for abortion. Vanita said that it was important for the groups to keep us informed as they see specific threats to individual rights and discrimination.

[redacted] **of the National Council of Jewish Women** accused the Supreme Court of legislating one religion's conception of when life begins. That belief is inconsistent with Jewish theology. In fact, Jewish law requires abortions in some circumstances (e.g., to save the life of the mother). She said that rabbis were worried about going to jail, but were also talking about setting up religious-based reproductive clinics. The clergy want further dialogue. She also noted that the threats under the FACE Act were intersecting with white supremacists' activities. The AG said that the Department was very focused on that issue, and that the FBI was tracking attacks on religious institutions. Vanita said that CRT was dealing with violence against religious groups.

[redacted] **of the Human Rights Campaign** expressed fear that the closure of clinics would deny transgender people gender-affirming care. She is also concerned about the legality of IVF, which LGBTQ+ people rely on. The AG said that we would do everything we can to protect these rights.

[redacted] **of In Our Own Voice**, a group focused on the reproductive rights of black women, asked how DOJ would protect women who get an abortion in a state where it is legal but are prosecuted in the state where they live. The AG said that the Constitution protected the right to travel to another state to get a legal abortion, but that did not guarantee the absence of prosecutions. He said that DOJ would not bring such cases.

[redacted] **of the Lawyers' Committee** expressed concern that criminalization of abortion would lead to people being denied access to public housing because of abortion convictions. He also note the prospect of discriminatory enforcement in school systems. The AG said that HUD and DOE are tracking these issues, and we are advising them.

[redacted] **of the National Partnership for Women and Families** said that the groups cannot easily access the data necessary to show discrimination. She wondered whether DOJ could help on that issue.

[redacted] **of the National Urban League** expressed concern that criminalization of abortion might affect the ability of entrepreneurs to get SBA loans, or impede the ability of some to get security clearances. The AG said that we h ad not thought about those issues, but that they merited attention.

Maya Wiley said that the meeting itself was a signal of DOJ's commitment to working with the groups and the priority it is giving the issue of reproductive rights. I think their gratitude for DOJ's commitment is heartfelt.

Please let me know if you have questions or would like elaboration on any of the issues above.

Best,

Rob

From: Bond, Rebecca (CRT) <[redacted]>
Sent: Monday, July 25, 2022 6:32 PM
To: Clarke, Kristen (CRT) <[redacted]>
Cc: Weiner, Robert (CRT) <[redacted]>
Subject: Leadership Conference Meeting on Reproductive Rights

Hi Kristen,

I hope that your speech went well and that you have a safe flight home. Attached please find the agenda and list of attendees for this afternoon's Leadership Conference meeting with the Attorney General. Rob is preparing a read-out. For the most part, the groups hewed closely to the topics identified on the agenda and expressed much appreciation for

the Department's efforts, including the Division's FACE-related work. Maya Wiley also acknowledged that the Division had met with the Leadership Conference recently. Although not listed on the attached agenda, both Lisa Monaco and Vanita gave opening remarks. Lisa's remarks focused on safety issues, and Vanita's focused on the work of the Reproductive Rights Task Force. Vanita also explained that you were in transit and highlighted that we were there to represent the Civil Rights Division.

Thanks,

Rebecca

EXHIBIT 033

From: "Clarke, Kristen (CRT)" <[redacted]>
To: "Robert Ledogar" <[redacted]@prochoice.org>
Cc: "Cheung-Smith, Bridget (CRT)" <[redacted]>
Subject: RE: NAF Security DC area trip - March for Life
Date: Tue, 10 Jan2023 22:37:43 -0500
Importance: Normal
Inline-Images: image002.jpg

Mr. Ledogar,

Thank you for your message. I would be pleased to meet with you during your time in D.C. I have copied my assistant who will help us coordinate.

Regards,

Kristen Clarke
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

From: Robert Ledogar <[redacted]@prochoice.org>
Sent: Monday, January 9, 2023 12:47 PM
To: Clarke, Kristen (CRT) <[redacted]>
Subject: [EXTERNAL] NAF Security DC area trip - March for Life

Good Day Ma'am,

I'm not sure if we meet, I am Robert Ledogar at NAF Security. I hope the holiday season was good and the New Year is going well. For this year's March for Life events, I'll be in the DC area on Sunday 1/5 thru Sunday 1/22. I will be visiting with several NAF members facilities to discuss security awareness and offer any assistance needed.

My back ground is 32 years of military and federal law enforcement. I served for almost 7 years in the US Navy with security, investigations and instructor. Then went onto the US Marshals Service, where I served 25 years in E/NY as a Deputy and then a Supervisory Deputy US Marshal. I had quite an amazing and tough career. I was fortunate enough to develop great relationships with AUSA's in E/NY, mainly the criminal division. In my position at NAF, I am the Southeast Regional Security Manager, which has me conducting training and assessments. In order to fully support the members of NAF, attending conferences and rally's such as the March for Life, so that we can identify and witness the extremists that find the need to prevent reproductive health care.

Over the past two (2) years that I have been with NAF Security, I have witnessed an amazing relationship with the NAF Security Director Michelle Davidson and members of the DOJ Civil Right Division AUSA Sanjay Patel, AUSA Katelyn Smith, AUSA Laura Cowall and Supervisor AUSA Paige Fitzgerald. The past year, NAF Security has been part of several FACE Act investigations, working with AUSA's and FBI in TN, FL, VA, CA, NY, MD and NC. The guidance from the team in DC has been nothing short of superb.

If I may request, as I mentioned I will be in DC for the week of January 15th, if time permits with your schedule I would be honored to meet with you and Thank You in person. I am available at your convenience.

Respectfully,

Robert Ledogar



NAF Security

SE Security Manager

[redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 034

From: "Cheung-Smith, Bridget (CRT)" <[redacted]>
To: "Clarke, Kristen (CRT)" <[redacted]>, Robert Ledogar <[redacted]>
Subject: Meeting - AAG Clarke and NAF Secuirty Robert Ledogar
Date: Tue, 17 Jan2023 13:45:02 -0500
Importance: Normal
Attachments: unnamed

EXHIBIT 035

From: "Weiner, Robert (CRT)" <[redacted]>
To: "Robert Ledogar" <[redacted]@prochoice.org>
Subject: RE: FYSA: NAF Security Alert: 2024 March for Life Protests in D.C. & Nationwide - Jan. 19 (Jan-Mar)
Date: Wed, 17 Jan 2024 15:57:18 -0500
Importance: Normal
Inline-Images: image001.jpg; image002.jpg; image003.jpg; image004.jpg; image005.jpg; image006.jpg; image007.jpg; image008.jpg; image009.jpg; image010.jpg; image011.jpg; image012.jpg; image013.jpg; image014.jpg; image015.jpg; image016.jpg; image017.jpg; image018.jpg; image019.jpg; image020.jpg; image021.jpg; image022.jpg; image023.jpg; image024.jpg; image025.jpg; image026.jpg; image027.jpg; image028.jpg; image029.jpg; image030.jpg; image031.jpg

---

Mr. Ledogar,

Paige Fitzgerald and I are looking forward to meeting you at 3 PM tomorrow.

Please come to the Justice Department entrance on Constitution Ave between 9th and 10th Streets, N.W. After you get through security there, someone from the Civil Rights Division Front Office will come escort you to our conference room.

Best regards,

Rob Weiner

From: Robert Ledogar <[redacted]@prochoice.org>
Sent: Friday, January 12, 2024 1:28 PM
To: Weiner, Robert (CRT) <[redacted]>
Subject: [EXTERNAL] FYSA: NAF Security Alert: 2024 March for Life Protests in D.C. & Nationwide - Jan. 19 (Jan-Mar)

Good day Sir,

I would like to share this with you, as this information is pushed over to our organization, members, law enforcement and community officials; all for security awareness.

Best,
Bob

Robert Ledogar
NAF Security, SE Region
[redacted]

For Your Situational Awarenes...

The 51st annual March for Life (M4L) has been scheduled to occur on Friday, January 19, 2024, in Washington D.C. The annual event garners significant attention and support from pro-life members, with hundreds to thousands of participants possibly attending. According to the event webpage, March for Life 2024, it does not appear that the group plans on protesting outside NAF or Planned Parenthood facilities in the area on the day of the event; however, due to the large number of protesters and counter-protesters that typically attend this event, the probability of this occurring remains highly likely. The event page also urges participants to remain peaceful and not to engage counter-protesters.

The event in Washington, D.C. is planned to begin at approximately 11:00am local time and occur until approximately 4:00pm. The rally itself will take place at 12:00pm local time and will begin at 12th St. on the National Mall, between Madison Drive and Jefferson Drive. Following the rally, the march will begin on Constitution Avenue between 12th and 14th Streets at approximately 1:00 pm local time. Participants will then march to the steps of the U.S. Capitol Building. Additionally, multiple protests have been planned to occur at the Supreme Court of the United States (SCOTUS) and other venues in Washington, D.C. in the days before, during, and after the main March for Life events. Several known groups of interest GOI), including the Progressive Anti-Abortion Uprising (PAAU), among others, are expected to participate in the protest activity. At this time, a Facebook event for the "2024 March for Life" lists 43 people as attending and 72 people as interested in attending the protest on Friday, January 19. Participants are encouraged to RSVP on the M4L website, and the number of those expected to attend the protest is expected to rise as the event date approaches.

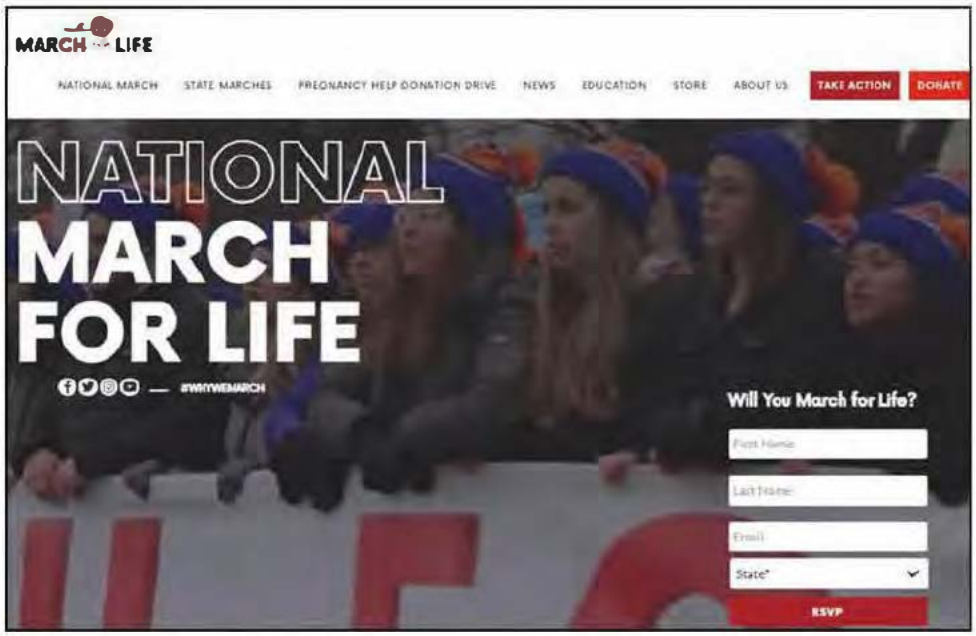
In addition to the main March for Life event in Washington, D.C., additional protests at various locations across the U.S., and on different days, have also been planned to coincide with the March for Life protests in Washington, D.C., some of which are planned to occur outside Planned Parenthood locations or other women's medical health facilities. Known groups of interest (GOIs) Priests for Life and known person of interest (POI) [redacted] have once again planned to conduct a "Prayer and Protest at Planned Parenthood" protest event on the day before the march, Thursday, January 18, at the Planned Parenthood, C[redacted]. The protest is planned to begin at approximately 9:00am local time and is expected to be peaceful; however, this cannot be confirmed. Additionally, this protest will very likely inspire counter-protests from pro-choice supporters that will increase the possibility of violence at the location. At this time, it is unclear how many people intend on attending the protest as no Facebook event page for the demonstration has been discovered at this time.

Protests associated with March for Life are planned to occur until at least March 2024, with additional events occurring between April and October. According to M4L's locations webpage, upcoming March for Life protests are scheduled in Virginia, MD, Atlanta, GA, Denver, CO, Springfield, IL, Sacramento, CA. Phoenix, AZ, Hartford, CT. Additionally, Facebook event pages have been discovered for several March for Life protests this month, including Dallas, TX, Carthage, TX, Saint Petersburg, FL, and Topeka, KS. The protests are intended to be peaceful but have inspired counter-protests from pro-choice supporters that will increase the possibility of violence at some locations. In addition, some locations could have up to 100 protesters or more, but this is currently difficult to determine.

Google Maps:



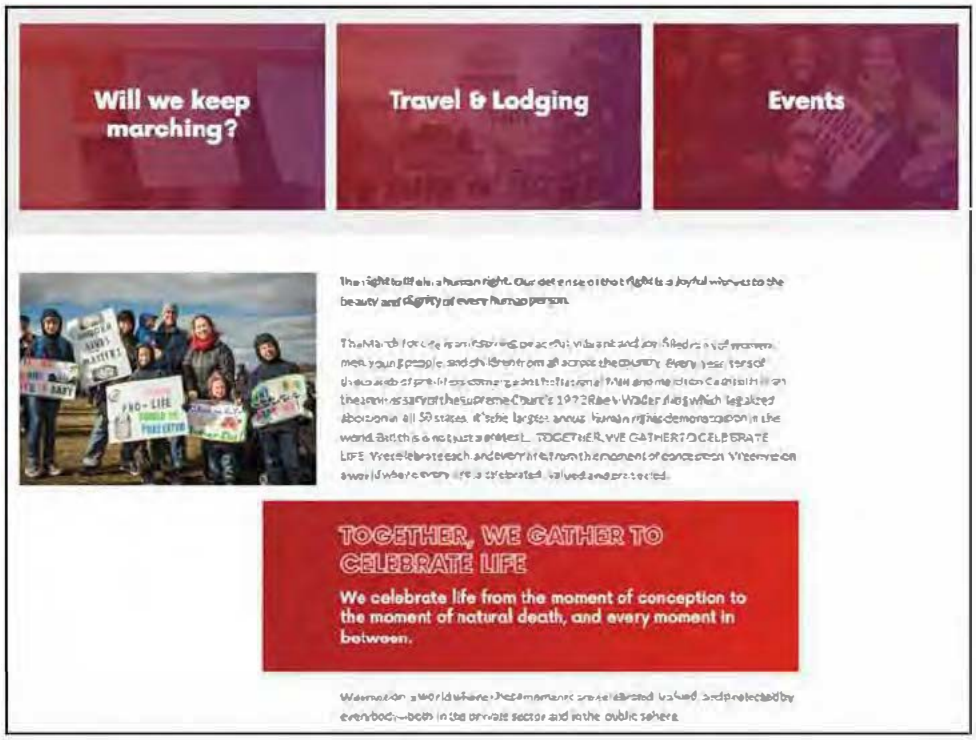
M4L website Images:



NEW ROUTE



In order to mark not only our victory in *Dobbs* but also our need to maintain a presence in Washington, this year's March for Life will have a slightly different marching route than in years past. This year we will also march past the Capitol and finish between the Capitol and Supreme Court. We will give witness to the inherent dignity of the human person to pro-life and pro-abortion legislators alike, helping them understand that we will not cease advocating for women and children until every life is protected.



WHY WILL WE CONTINUE TO MARCH?

Even with the wonderful blessing of *Roe v. Wade* being overturned, which allows more freedom at the state level to enact pro-life laws, the necessary work to build a culture of life in the United States of America is not finished. Rather, it is focused differently. Sadly, the number of abortions annually is still well over 900,000 each year, and that number is expected to decrease only by roughly 200,000 each year in a post-*Roe* America. Many national legislative battles loom, including even keeping longstanding Hyde protections, which limit government funding for abortion on annual appropriation bills. The Hyde Amendment has saved over 2 million lives and is arguably the most impactful pro-life policy in our nation's history, but now cannot be taken for granted. Last, our most important work is changing hearts and minds. The goal of the national March for Life is to not only change laws at the state and federal level, but to change the culture to ultimately make abortion unthinkable.

With the role of the states being more important, we are also growing a strong state march for life initiative quickly. however, we will continue to march every January at the national level until a culture of life is restored in the United States of America.

2024 SCHEDULE

Wednesday, January 17, 2024

March for Life Expo: 6:00 p.m. – 8:00 p.m.

Thursday, January 18, 2024

March for Life Expo: 9:00 a.m. – 8:00 p.m.
Marching 101: 11:00 a.m. – 12:00 p.m.

Friday, January 19, 2024

March for Life Expo: 9:00 a.m. – 11:00 a.m. & 4:00 p.m. – 7:00 p.m.
Pre-Rally Concert: 11:00 a.m. – 12:00 p.m.
March for Life Rally: 12:00 p.m. – 1:00 p.m.
March for Life: 1:00 p.m. – 4:00 p.m.
Rose Dinner Gala: 6:00 p.m. – 9:00 p.m.

EVENTS

Wednesday, January 17

March for Life Expo

The March for Life Expo is open to the public and no charge to attend. The Expo is an opportunity for marchers to connect with pro-life organizations and ministries, pick up pro-life swag, and meet other pro-lifers from across the country.

— Learn More

Thursday, January 18

Marching 101: Pro-Life Advocacy Workshop

Marching 101 is a FREE advocacy workshop, giving participants the opportunity to learn how to make their voices heard by their elected representatives. Hear from a panel of top pro-life lobbyists and policy experts on how to effectively navigate the legislative system, from Capitol Hill to your state capitol.

— Register Today

Friday, January 19

March for Life Rally

Join us in Washington, DC for the March for Life Rally. This FREE event features a live concert and inspiring speeches from pro-life leaders – sharing how to stay involved in the pro-life movement all year long. The Rally will begin at 12 pm ET on the National Mall. You can also watch the live-streamed event on our website, Facebook, and YouTube channel.

March for Life

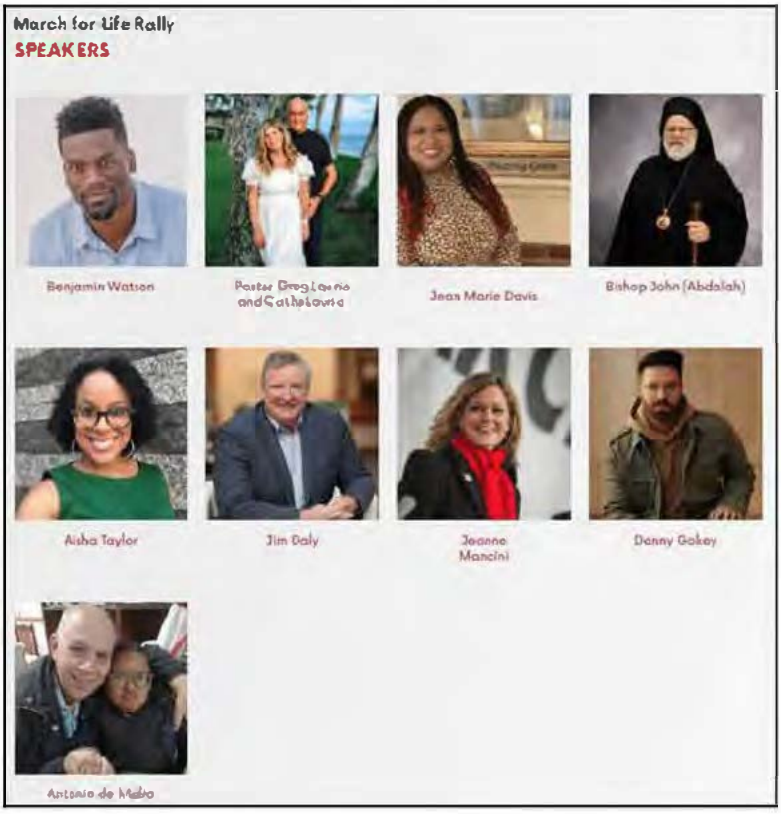
This is the main event! The March for Life will begin immediately following the Rally - usually around 1p.m. – starting between 12th and 14th Streets. We will march peacefully up Constitution Ave. to the steps of the U.S. Capitol Building.
After marching, consider attending the Silent No More testimonies outside the Supreme Court, visiting your Representative to advocate for life, or proceeding past The Capitol to help the flow of oncoming marchers.

— See Why People March

Rose Dinner Gala

An evening of inspiration and fellowship, the Rose Dinner is the perfect way to conclude your March for Life experience in our Nation's Capital.

— Learn More about the Rose Dinner





There are many events happening around Washington, D.C. surrounding the March for Life. These events are not sponsored by the March for Life, but we wanted to make you aware of the many opportunities to the Nation's Capital.

Check back in the weeks leading up to the March for Life as related events are continually added to this page! To have your event listed, please reach out to Dawn Fitzpatrick.

MUSEUM OF THE BIBLE

January 17-21, 2024
400 4th St SW Washington, D.C. | 10:00 AM – 5:00 PM

Washington Revelations: A Monumental Scavenger Hunt of Biblical Proportions. Search out Biblical references throughout D.C. to find where the Bible hides in plain sight! Plus, bring your finished answers back to the Museum of the Bible to claim your prize – a free pass to refer on the Washington Revelations virtual fly over.

January 18 – The Race is On!

The Great Expedition Day at the Museum of the Bible. Our educators at "Mission Command" will launch guests of all ages on this immersive experience – The Great Expedition! Like on *The Amazing Race*, your group will compete to solve clues and complete tasks throughout the museum, including our Scripture and Science exhibit. Additional $4.99 for the Great Expedition Day.

Museum admission just $10 with discount code MFL.

Learn more at www.museumofthebible.org

LIFE IS VERY GOOD

January 18-19, 2024
Eagle Bank Arena | 7:30 PM – 9:45 PM Thursday, 9:00 AM – 11:00 AM Friday

The Diocese of Arlington invites you to join thousands of participants from across the country at Life is VERY Good on January 18 and 19, 2024. Life is VERY Good will be held at Eagle Bank Arena, which has a capacity of 8400, so we welcome groups of any size! The Evening of Prayer on January 18 is an opportunity to pray for the success of the March for Life in changing our hearts and those of others in this country. The Morning Rally on January 19 prepares us to take to the streets of Washington D.C. to make our voices heard as we proclaim the gospel of life. We hope to see you at one or both of these events to proclaim that "Life is VERY Good!"

Learn more at arlingtondiocese.org/livg/

LAW OF LIFE SUMMIT (11TH ANNUAL)

January 18, 2024
Westin Downtown D.C. Potomac Ballroom | 1:00 PM – 4:00 PM

The Law of Life Summit has been referred to as the best kept secret during the week of the March for Life. At the Summit you will hear from leaders, lawyers, media personalities and advocates. The Summit ties together law, media and strategy to energize and inspire the movement in post Roe America.

The *2024 Law of Life Summit* will include the famous firehose session providing a snapshot of pro-life America with multiple guest-speakers, a VIP panel for messaging in media, and finally our keynote panel hosted by the *Thomas More Society* featuring nationally recognized and distinguished attorneys. The full program will be announced in early January!

Registration is free with premium tickets available. Space is limited. Register here.
https://lawoflifesummit.regfox.com/2024-law-of-life-summit-dc

LIFE FEST

January 19, 2024
The Westin Downtown D.C. | 7:00 AM – 10:30 AM

Let's return to the heart of the matter.

We are at a critical moment in history that demands a new vision. The fall of Roe is not the end. Let's renew our commitment to love. Let's be agents of healing in a broken world. We need each other.

For more information see www.lifefestrally.com/

NATIONAL PRAYER SERVICE

January 19, 2024
DAR Constitutional Hall | 8:30 AM – 10:30 AM

Start the day of the March for Life at the 29th Annual National Prayer Service on Friday, January 19, 2024 at DAR Constitution Hall, 1776 D. St (18th and D) Washington, DC, from 8:30-10:30am! Catholic Mass at 7:30a.m! We will present the Pro-Life Recognition Award to Bishop Joseph Strickland of Tyler, TX. Mark Lee Dickson, founder of the Sanctuary Cities for the Unborn initiative. Sr. Deirdre Byrne, POSC and Mark Houck. It will be a time of prayer, praise, music and inspiring speakers. Pro-Life Leader Frank Pavone will deliver a powerful pro-life message. Sponsored by Priests for Life and the National Pro-Life Religious Council. Admission is free.

For more information see www.NationalPrayerService.com

TRAVEL

Airports

The most convenient way to get to D.C. is by flying here. There are two airports serving the D.C. area, both are Metro accessible:

- **Washington Dulles Airport** – in Dulles, VA; an easy 25-mile drive from downtown D.C.
- **Ronald Reagan Washington National Airport** – in Crystal City, VA; just 5 miles from downtown D.C.

Buses

Charter buses are also a great way to get to D.C. However, they present certain parking problems and do require permits. Charter buses can be parked at the following locations: **Union Station** or the **Basilica of the National Shrine of the Immaculate Conception.**

— Obtain your bus permits

Interested in organizing a bus trip?
Special Event Management handles VIP transportation for the March for Life and has arranged hundreds of bus trips for groups coming to the March from all over the US.
To receive a customized quote, please reach out to Chuck Genrich at: [redacted]
Phone: [redacted]
Toll Free: [redacted]
Website: www.specialeventteam.com

Metro

Whether you want to do some sight-seeing or come straight to the March, the easiest way to get around D.C. is through our extensive Metro system. Gathering with your fellow pro-life marchers in D.C. is easy. On the day of the March itself, simply take the metro to one of the three stops within an easy walking distance from the rallying location: **Federal Triangle, Smithsonian, Metro Center.**

— Order, register, and add value to your metro card

HOTEL INFORMATION

IMPORTANT NOTE:

On October 6, 2023, our host hotel, the Renaissance DC Downtown Hotel will officially be rebranded and renamed the Westin DC Downtown Hotel.

The Westin DC Downtown Hotel (*previously named Renaissance DC Downtown Hotel)* is located across from the Washington Convention Center, between Capitol Hill and the White House. The hotel is 25 miles from Washington Dulles Airport and 5 miles from Ronald Reagan Washington National.

WESTIN DC DOWNTOWN HOTEL (Formerly Renaissance Hotel)

999 9th St NW

Washington, D.C. 20001

MFL Reservations:

Individual Reservations: **BOOK HERE!**

Metro location: Gallery Place/Chinatown

The March for Life has guaranteed the bulk of our rooms for three nights, Wednesday, January 17, Thursday, January 18, and Friday, January 19, 2024. We also have some rooms blocked before and after these dates for those wishing to extend their time in Washington, D.C.



KENTUCKY MARCH FOR LIFE

MICHIGAN MARCH FOR LIFE

NEW JERSEY MARCH FOR LIFE

NORTH DAKOTA MARCH FOR LIFE

OHIO MARCH FOR LIFE

PENNSYLVANIA MARCH FOR LIFE

VIRGINIA MARCH FOR LIFE

ARIZONA MARCH FOR LIFE

CALIFORNIA MARCH FOR LIFE

COLORADO MARCH FOR LIFE

CONNECTICUT MARCH FOR LIFE

GEORGIA MARCH FOR LIFE

ILLINOIS MARCH FOR LIFE

Priests for Life - Website Images:

2024 March for Life, Washington, DC and Walk for Life, San Francisco

Priests for Life organizes and helps to lead a number of events associated with the annual **March for Life** in Washington and **Walk for Life West Coast** – including the Planned Parenthood Protest, the National Prayer Service, the Youth Rally and the Silent No More Gatherings. Below, you will find information about those and similar events and how you can connect with us! Please spread the word!

For those who cannot attend the events, follow the events live at **www.EndAbortion.TV** ***and on the various social media platforms linked from there!***

2024 March for Life, Washington, DC

Thursday, January 18

9-11 a.m.: Prayer and protest at Planned Parenthood killing center in DC at [redacted]

12:30 - 2:00 p.m.: Activist event an hour and a half after Planned Parenthood event ends. Co-sponsored by: Priests for Life, Stand True, Christian Defense Coalition, The White Rose Resistance and Created Equal. Speakers confirmed so far will be Bryan Kemper, Frank Pavone, AJ Hurley, Pat Mahoney. More speakers and exact location to be announced.

Friday, January 19

8:30 -10:30 a.m. - National Prayer Service at DAR Constitution Hall, 1776 D St., NW (18th and D St). **Catholic mass at 7:30 am.** For more information, see www.NationalPrayerService.com. **Frank Pavone will deliver a strong pro-life message to rally the crowd and we will honor Bishop Joseph Strickland, Mark Lee Dickson, Sr. Deidre Byrnes, POSC and Mark Houck.** Admission is free. Help us fill the beautiful hall with prayers and song as we prepare to go out and march in defense of the most defenseless among us. The event consists exclusively of two worship services: The Mass and the interdenominational prayer service.

1:00 p.m. - March for Life: Members of the Silent No More Awareness Campaign (a joint project of Priests for Life and Anglicans for Life) march together, holding their signs showing regret for their abortions.

2:00 p.m. (approx.) - Once the marchers begin to reach the end of the March route, the **Gathering of the Silent No More Awareness Campaign** begins in front of the Supreme Court. Testimonies are given by mothers and fathers who have lost children to abortion, as well as by other family members who have been impacted by abortion. The public is asked to come and support these brave women and men who give their testimonies, and to spread those testimonies which can be found at www.abortiontestimonies.com.

Saturday, January 20

8:00 a.m. - 7:00 p.m.: Priests for Life is a co-sponsor of the National Pro-life Summit. Grand Hyatt, 1000 H Street NW, Washington, DC. Stop by to meet our leaders and staffers.

Monday, January 22 (The actual anniversary of Roe v. Wade)

11 a.m. to 1 p.m. - Prayers and remembering the victims of Roe v. Wade - in front of the Supreme Court. Flowers will be laid on the steps of the Supreme Court at the conclusion.



2024 West Coast Walk for Life, San Francisco, CA

Saturday, January 20

8:00-9:00 am: Planned Parenthood Protest, 1522 Bush Streetnear Van NessAvenue, San Francisco. Frank Pavone and other leaders will speak.

8:30-9:30 am: Pro-life Leader Frank Pavone will be on the Plaza of St. Mary's Cathedral, 1111 Gough Street, San Francisco greeting and talkingwith marchers prior to the 9:30AM Walk for Life Mass.

10:45 a.m. -12:15 p.m. - Civic Center Plazae- Pro-life Leader Frank Pavone, Pastoral Director of the Silent No More Awareness Campaign, will address the crowd and lead the members of Silent No More who will share their testimonies of the pain that follows abortion and the healing that is available. This is the same location as the Walk for Life Rally.

12:30 - 1:30 pm- Walk for Life Rally at the Civic Center Plaza, San Francisco.

1:30 pm - West Coast Walk for Life -- Members of the Silent No More Awareness Campaign will march together.

Archdiocese of New York -Wwebsite Images:

March For Life – Washington D.C.
Friday, January 19, 2024

What is the March for Life in Washington D.C.?

The March for Life in Washington D.C. began as a grassroots response of pro-lifers nationwide to Roe v. Wade, the 1973 Supreme Court decision legalizing abortion throughout the 9 months of a woman's pregnancy. Although Roe v. Wade was overturned in the landmark Dobbs vs Jackson decision, the battle of life continues and the March for Life is more important than ever! Inspired by the Holy Spirit's gift of Reverence, Catholics and all people of good will come together at our Nation's Capital to pray and publicly intercede on behalf of the unborn, their parents, families, our communities, our nation and its leaders – that this prayerful presence may open hearts, minds, souls to the fullness of the Gospel of Life in our lives and laws.

Bus Pilgrimages to the March for Life

Below are the bus trips that confirmed for 2024 – keep checking back as we expect more buses to be added:

- **Brooklyn/Queens**
- **Bronx**
- **Dutchess**
- **Manhattan**
- **Orange County**
- **Putnam County**
- **Rockland County**
- **Staten Island**
- **Westchester**

March for Life Mass for Archdiocese of New York Pilgrims

Join pilgrims from throughout New York who have traveled to Washington, D.C. for the March for Life at the New York Pilgrim Mass at 10:30am at St. Patrick's Church.

March for Life, Washington D.C.
January 19, 2024 @ 10:30AM

NY PILGRIM MASS

St. Patrick's Church
619 10th St NW
Washington D.C.



Opportunities for Local Prayer and Witness

If you are not able to attend the March for Life in D.C. this year, we encourage you to participate in local prayer events or peaceful, prayerful witness outside of an abortion clinic near you. January 22nd remains the National Day of Prayer and Fasting for the legal protection of the unborn.

Consider witnessing at one of the following abortion clinics:

- **Bronx**
- **Manhattan**
- **White Plains**
- **Newburgh**
- **Spring Valley**
- **Staten Island**

Life Fest

Life Fest is a Mass and Rally hosted by the Sisters of Life on the morning of the March for Life. January 19th, from 7:30am-10:30 am in Washington, D.C. It includes music, prayer and dynamic speakers. Perfect for youth and young adults. For more information, visit www.lifefestrally.com.

WHY LIFE FEST? BECAUSE EVERY HUMAN PERSON IS MADE IN GOD'S IMAGE. BECAUSE OUR WORLD IS CRYING OUT FOR HEALING. BECAUSE LOVE IS THE ANSWER. YOU HAVE BEEN CHOSEN FOR THIS TIME. A NEW MOVEMENT IS RISING UP. WILL YOU?



National Prayer Vigil for Life

The National Prayer Vigil for Life is a pro-life prayer vigil held on the eve of the March for Life each January. It is held at the Basilica of the National Shrine of the Immaculate Conception in Washington, DC. The Opening Mass will be celebrated by Bishop Burbidge on Thursday, January 18th at 5:00 p.m. and will be immediately followed by a 7:00-8:00 p.m. Holy Hour for Life. Throughout the night, Holy Hours will be led by various bishops throughout the country and available on live-stream. A closing Mass for the Vigil will be celebrated at 8am on Friday morning. Typically, over 20,000 pilgrims from across the nation pray through the night for an end to abortion and a greater respect for all human life.

The Vigil Program will be televised by EWTN and livestreamed on the Basilica's webpage so millions can participate remotely.



Facebook Images:

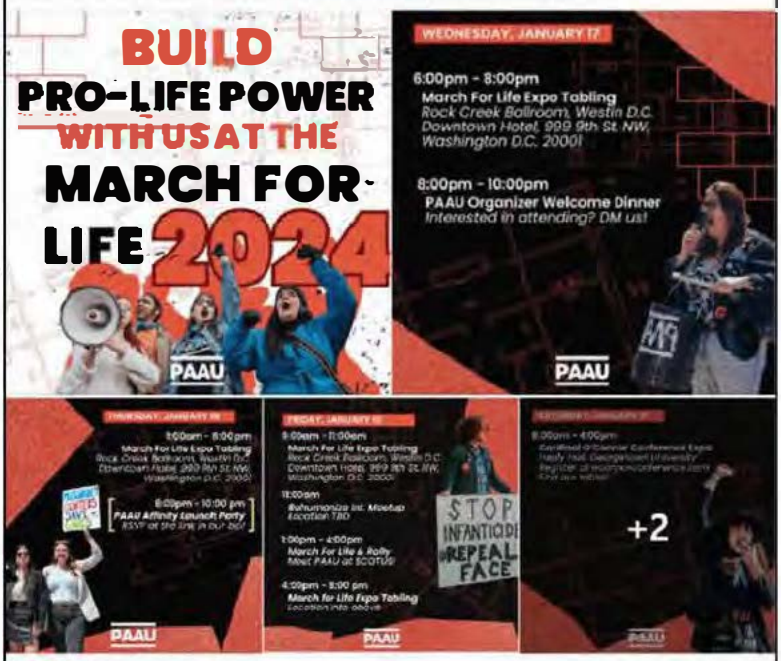




Progressive Anti-Abortion Uprising
December 27, 2023 at 11:55 AM

What is PAAU doing for the M4L? It's all in this post. BE THERE!!!!

RSVP for Affinity Launch event here: https://forms.gle/7SxQxhfTioKfu4h78



11 4 comments 1 share

LifeSiteNews
@LifeSite

FULL LIST: Events surrounding the 2024 March for Life

#MarchforLife #ProLife #abortion



11:30 AM · Jan 3, 2024 · 506 Views

2 1

EXHIBIT 036

From: "Weiner, Robert (CRT)" <[redacted]>
To: "Fitzgerald, Paige (CRT)" <[redacted]>
Subject: Emails from the person we're meeting with tomorrow
Date: Wed, 17 Jan 2024 15:53:07 -0500
Importance: Normal
Embedded: [EXTERNAL]_FYSA:_Intel_Social_Media_Alert:_GOI_Protest_at_Fort_Myers,_FL_[redacted]_-_Jan._18;
[EXTERNAL]_Social_Media_Alert:_GOI_Protest_at_[redacted]_in_Washington,_DC_-_Jan._18;
[EXTERNAL]_FYSA:_NAF_Security_Alert:_2024_March_for_Life_Protests_in_D.C._&_Nationwide_-_Jan._19_(Jan-Mar)

From: Robert Ledogar <[redacted]@prochoice.org>
To: "Weiner, Robert (CRT)" <[redacted]>
Subject: [EXTERNAL] FYSA: Intel Social Media Alert: GOI Protest at Fort Myers, [redacted] - Jan.18
Date: Fri, 12 Jan 2024 13:31:00 -0500
Importance: Normal
Inline-Images: image002.jpg; image003.jpg

Sir,

This group, OSA is the group that is announcing protests in support of members being prosecuted in TN and this information is about the group attending a conference in Ft Myers, FL and organizing a protest at a local clinic.

Best,

FYSA– we believe that members of OSA, will drive from Nashville, TN to Ft Myers, FL. They may attempt to perform an unannounced protest in GA.

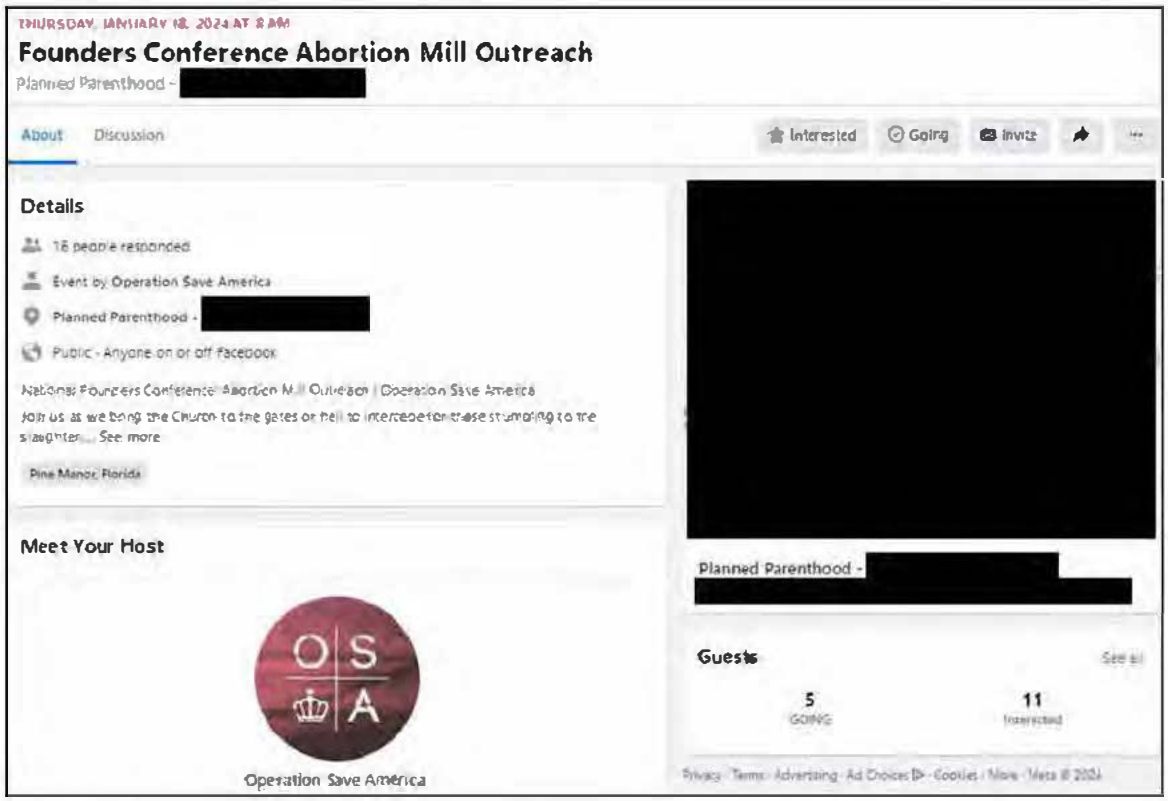
Known group of interest (GOIs) Operation Save America (OSA) has organized their "Founders Conference Abortion Mill Outreach" pro-life conference and protest events to occur on **Thursday, January 18, 2024**, beginning at **8:00am** local time at Planned Parenthood's [redacted] located at [redacted]

According to the Facebook event page, at this time, at least 5 people are confirmed to attend and 11 others have expressed interest. It is unclear how many people were invited to the protest due to Facebook's privacy settings. The events will feature known persons of interest (POI) and current and former leaders of OSA, Jason Storms, Derin Stidd, [redacted] and more. Due to the relatively large following of OSA, as well as the aforementioned POIs and other GOIs involved, it is likely that the event and subsequent protests will gather a significant amount of support and participants; however, this cannot be confirmed. The protests are intended to be peaceful but are expected to garner a sizeable group of demonstrators, and are also likely to inspire counter-protests from pro-choice supporters that may increase the possibility of disturbances or violence. Additionally, it is possible that extreme or more radical pro-life supporters could use this as an excuse, reason or motivation to conduct acts of violence against NAF or their affiliates.

The descriptions from the OSA Facebook event page state the following:

> *"Join us as we bring the Church to the gates of hell to intercede for those stumbling to the slaughter... We will have an extended time of prayer, worship, a series of rally talks, and sidewalk advocacy as we plead with mothers and fathers not to take the lives of their precious children."*

Facebook Images:



Twitter Images:



Regards,

From: Robert Ledogar <[redacted]@prochoice.org>
To: "Weiner, Robert (CRT)" <[redacted]>
Subject: [EXTERNAL] Social Media Alert: GOI Protest at [redacted] in Washington, DC - Jan. 18
Date: Fri, 12 Jan 2024 13:28:54 -0500
Importance: Normal
Inline-Images: image010.jpg; image011.jpg; image012.jpg; image013.jpg

---

Sir,

Additional information on a specific group, PAAU. This information is also shared with our organization, members, law enforcement and community officials.

Best,
Bob

This is the group that raises so many concerns for all of us, they were the one's who attempted last year to schedule fake appointments, walk ins at several clinics and disruption outside of clinics. Several of the groups' members were found guilty at trial when they committed felony acts against clinics in the DC area. This group just recently traveled to NY, NH and MA to disrupt clinic operations at four centers.

Known group of interest (GOI) Progressive Anti-Abortion Uprising (PAAU) has planned a "DC Planned Parenthood Protest" to occur on Thursday, January 18, 2024, at Planned Parenthood's [redacted] Center, located at [redacted] Protest activity is scheduled to begin at approximately 12:00pm local time and will include "sidewalk counseling" and "community defense." According to the Facebook event page, at this time, at least two people are confirmed to attend and one other has expressed interest. The number of expected participants will likely increase as the protest date draws closer.

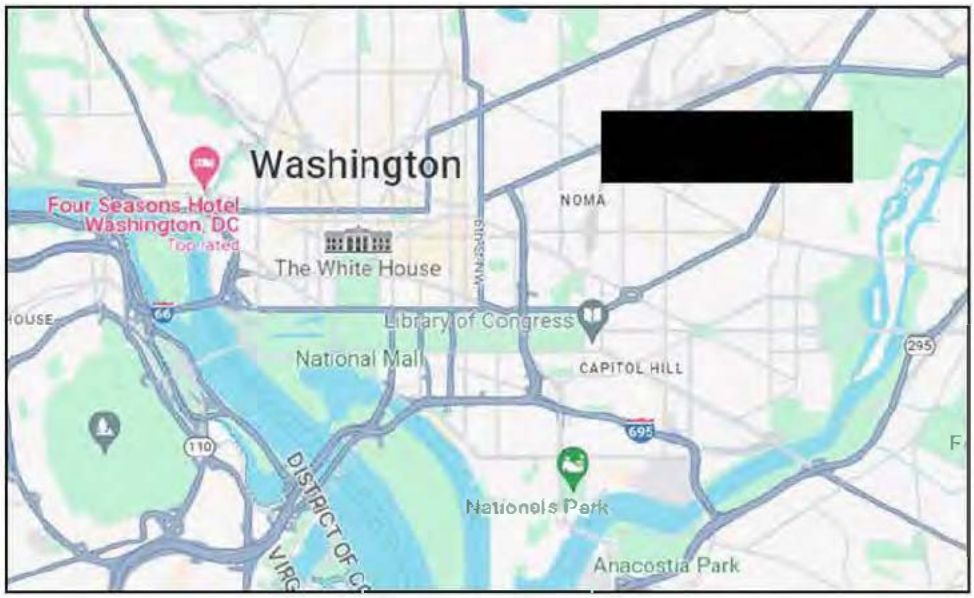
PAAU's Facebook event page states the following:

> *"Join us on one of DC's late-term abortion days to participate in sidewalk counseling, protest, and community defense. During the busy March for Life week, take a moment to spend time where the killing is happening. PAAU will provide literature, chalk, signs, and megaphones. Come as you are and participate how you want. See you there!"*

While the protest is expected to be peaceful, there is the potential that protesters may employ tactics, such as causing disturbances, trespassing or attempting to illegally enter the facility, due to PAAU's involvement and commitment to "Red Rose Rescue" (RRR) and "Pink Rose Rescue" (PRR) events. The protest may also inspire counter-protests from pro-choice supporters that could increase the possibility of violence during the demonstrations. At this time, PAAU has not publicly expressed an intent to protest any other women's health centers in the Washington, DC area, but impromptu or planned actions at local facilities remain likely.

The protest comes ahead of the 51st annual March for Life (M4L) on Friday, January 19, 2024 in Washington, DC. PAAU has created a "March for Life with PAAU!" event, in which its members will gather with other pro-life groups and walk to the M4L rally location on the National Mall. PAAU has also organized a "PAAU Mixer" event to occur on Thursday, January 18, 2024, the night before the March for Life in NE Washington, DC. The event is RSVP only, and the address and details will only besent to registered attendees.

Google Maps Images:



Facebook Images:



FRIDAY, JANUARY 19, 2024 AT 11 AM – 4 PM

March for Life with PAAU!

Supreme Court of the United States

About Discussion

Interested Going Invite

Details

3 people responded

Event by Progressive Anti-Abortion Uprising

Supreme Court of the United States

Duration: 5 hr

Public · Anyone on or off Facebook

Want to march with PAAU this year? Join us as we walk from the Reflemantic International annual meetup all the way to the Supreme Court where we will rally together to make noise for LIFE! Here's the plan:

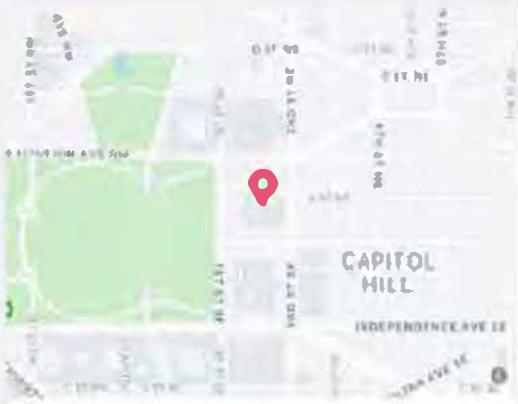
11:00-12:30: Reflemantic meet up
Join us at the corner of 12th and Constitution as we gather with other non-traditional pro-life groups! This event features speakers, music and fellowship.

12:30-1:30: Walk to SCOTUS
Following the meetup, PAAU will walk from that location to the Supreme Court, culture jamming and handing out fliers on the way. This allows us to walk in front of the larger March and saturate the space with our messaging and arrive at SCOTUS before others get there.

2:00-4:00: PAAU Rally at SCOTUS
Meet PAAU infront of the Supreme Court at the end of the March. We will rally, protest, celebrate and make noise for the unborn together as we call for Justice for the Pre, the Repeal of FACE, and Preborn Liberation!

See less

Washington D.C.



Supreme Court of the United States
1 1st St NE, Washington DC

The Supreme Court of the United States is the highest federal court of the United States. Established pursuant to Article ... See more

Guests

See all

2 GOING

1 Interested

THURSDAY, JANUARY 18, 2024 AT 8 PM – 10 PM

PAAU Mixer

About Discussion

Interested Going Invite

Details

6 people responded

Event by Progressive Anti-Abortion Uprising

Duration: 2 hr

Public · Anyone on or off Facebook

Join us for a Mixer event at the new Activist House in NE DC! This event is by RSVP only, so please do not share the address with others. Address and details will be sent out by email on Monday, January 15th.

Come enjoy food, drinks, and friends and learn about how to be involved with PAAU! We can't wait to see you there!

RSVP HERE: https://forms [redacted] See less

Guests

See all

3 GOING

3 Interested

Privacy · Terms · Advertising · Ad Choices · Cookies · More · Meta © 2024

From: Robert Ledogar <[redacted]@prochoice.org>
To: "Weiner, Robert (CRT)" <[redacted]>
Subject: [EXTERNAL] FYSA: NAF Security Alert: 2024 March for Life Protests in D.C. & Nationwide Jan. 19 (Jan-Mar)
Date: Fri, 12 Jan 2024 13:27:39 -0500
Importance: Normal
Attachments: IMG_1411.jpg
Inline-Images: image002.jpg; image003.jpg; image004.jpg; image005.jpg; image006.jpg; image007.jpg; image008.jpg; image009.jpg; image010.jpg; image011.jpg; image012.jpg; image013.jpg; image014.jpg; image015.jpg; image016.jpg; image017.jpg; image018.png; image019.jpg; image020.jpg; image021.jpg; image022.jpg; image023.jpg; image024.jpg; image025.jpg; image026.jpg; image027.jpg; image028.jpg; image029.jpg; image030.jpg; image031.jpg; image032.jpg; image033.jpg

---

Good day Sir,

I would like to share this with you, as this information is pushed over to our organization, members, law enforcement and community officials; all for security awareness.

Best,
Bob

Robert Ledogar
NAF Security, SE Region
[redacted]

For Your Situational Awarenes...

The 51st annual March for Life (M4L) has been scheduled to occur on Friday, January 19, 2024, in Washington D.C. The annual event garners significant attention and support from pro-life members, with hundreds to thousands of participants possibly attending. According to the event webpage, March for Life 2024, it does not appear that the group plans on protesting outside NAF or Planned Parenthood facilities in the area on the day of the event; however, due to the large number of protesters and counter-protesters that typically attend this event, the probability of this occurring remains highly likely. The event page also urges participants to remain peaceful and not to engage counter-protesters.

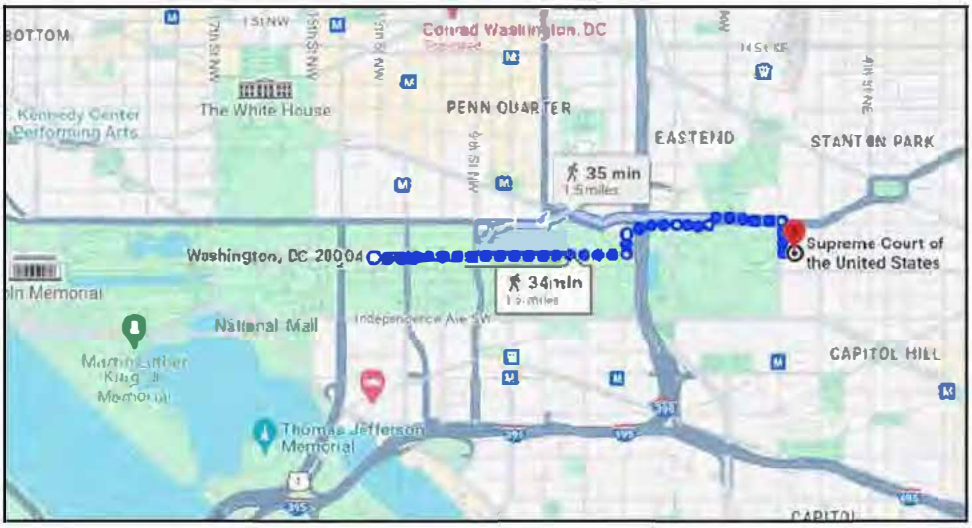
The event in Washington, D.C. is planned to begin at approximately 11:00am local time and occur until approximately 4:00pm. The rally itself will take place at 12:00pm local time and will begin at 12th St. on the National Mall, between Madison Drive and Jefferson Drive. Following the rally, the march will begin on Constitution Avenue between 12th and 14th Streets at approximately 1:00 pm local time. Participants will then march to the steps of the U.S. Capitol Building. Additionally, multiple protests have been planned to occur at the Supreme Court of the United States (SCOTUS) and other venues in Washington, D.C. in the days before, during, and after the main March for Life events. Several known groups of interest GOI), including the Progressive Anti-Abortion Uprising (PAAU), among others, are expected to participate in the protest activity. At this time, a Facebook event for the "2024 March for Life" lists 43 people as attending and 72 people as interested in attending the protest on Friday, January 19. Participants are encouraged to RSVP on the M4L website, and the number of those expected to attend the protest is expected to rise as the event date approaches.

In addition to the main March for Life event in Washington, D.C., additional protests at various locations across the U.S., and on different days, have also been planned to coincide with the March for Life protests in Washington, D.C., some of which are planned to occur outside Planned Parenthood locations or other women's medical health facilities. Known groups of interest (GOIs) Priests for Life and known person of Interest (POI) [redacted] have once again planned to

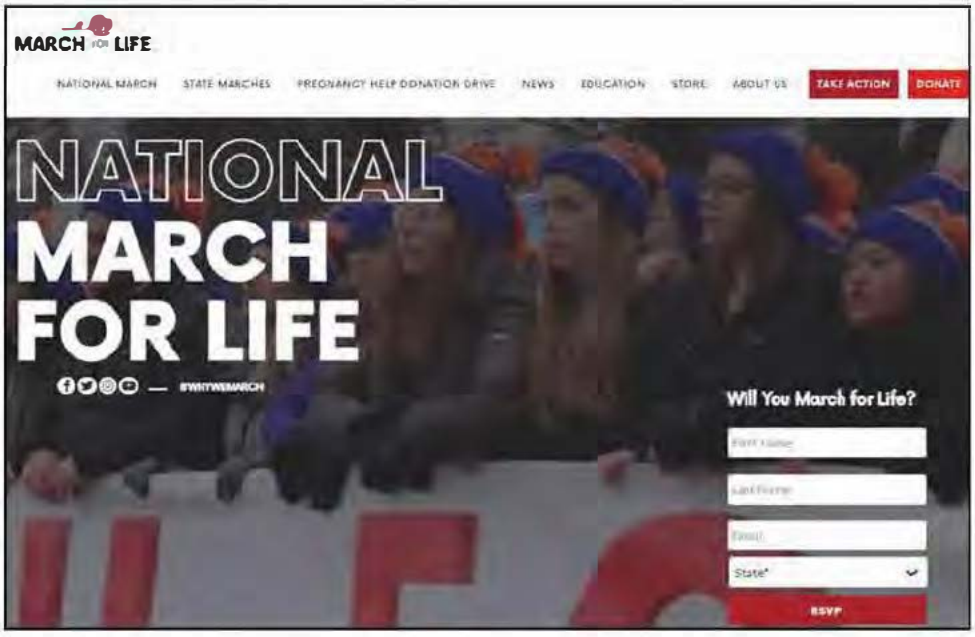
conduct a "Prayer and Protest at Planned Parenthood" protest event on the day before the march, Thursday, January 18, at the Planned Parenthood, [redacted] Center, [redacted] The protest is planned to begin at approximately 9:00am local time and is expected to be peaceful; however, this cannot be confirmed. Additionally, this protest will very likely inspire counter-protests from pro-choice supporters that will increase the possibility of violence at the location. At this time, it is unclear how many people intend on attending the protest as no Facebook event page for the demonstration has been discovered at this time.

Protests associated with March for Life are planned to occur until at least March 2024, with additional events occurring between April and October. According to M4L's locations webpage, upcoming March for Life protests are scheduled in Virginia, MD, Atlanta, GA, Denver, CO, Springfield, IL, Sacramento, CA. Phoenix, AZ, Hartford, CT. Additionally, Facebook event pages have been discovered for several March for Life protests this month, including Dallas, TX, Carthage, TX, Saint Petersburg, FL, and Topeka, KS. The protests are intended to be peaceful but have inspired counter-protests from pro-choice supporters that will increase the possibility of violence at some locations. In addition, some locations could have up to 100 protesters or more, but this is currently difficult to determine.

Google Maps:



M4L website Images:



NEW ROUTE



In order to mark not only our victory in *Dobbs* but also our need to maintain a presence in Washington, this year's March for Life will have a slightly different marching route than in years past. This year we will also march past the Capitol and finish between the Capitol and Supreme Court. We will give witness to the inherent dignity of the human person to pro-life and pro-abortion legislators alike, helping them understand that we will not cease advocating for women and children until every life is protected.



WHY WILL WE CONTINUE TO MARCH?

Even with the wonderful blessing of *Roe v. Wade* being overturned, which allows more freedom at the state level to enact pro-life laws, the necessary work to build a culture of life in the United States of America is not finished. Rather, it is focused differently. Sadly, the number of abortions annually is still well over 900,000 each year, and that number is expected to decrease only by roughly 200,000 each year in a post-*Roe* America. Many national legislative battles loom, including even keeping longstanding Hyde protections, which limit government funding for abortion on annual appropriation bills. The Hyde Amendment has saved over 2 million lives and is arguably the most impactful pro-life policy in our nation's history, but now cannot be taken for granted. Last, our most important work is changing hearts and minds. The goal of the national March for Life is to not only change laws at the state and federal level, but to change the culture to ultimately make abortion unthinkable.

With the role of the states being more important, we are also growing a strong state march for life initiative quickly, however, we will continue to march every January at the national level until a culture of life is restored in the United States of America.

2024 SCHEDULE

Wednesday, January 17, 2024

March for Life Expo: 6:00 p.m. – 8:00 p.m.

Thursday, January 18, 2024

March for Life Expo: 9:00 a.m. – 8:00 p.m.
Marching 101: 11:00 a.m. – 12:00 p.m.

Friday, January 19, 2024

March for Life Expo: 9:00 a.m. – 11:00 a.m. & 4:00 p.m. – 7:00 p.m.
Pre-Rally Concert: 11:00 a.m. – 12:00 p.m.
March for Life Rally: 12:00 p.m. – 1:00 p.m.
March for Life: 1:00 p.m. – 4:00 p.m.
Rose Dinner Gala: 6:00 p.m. – 9:00 p.m.

EVENTS

Wednesday, January 17

March for Life Expo

The March for Life Expo is open to the public and no charge to attend. The Expo is an opportunity for marchers to connect with pro-life organizations and ministries, pick up pro-life swag, and meet other pro-lifers from across the country.

— Learn More

Thursday, January 18

Marching 101: Pro-Life Advocacy Workshop

Marching 101 is a FREE advocacy workshop, giving participants the opportunity to learn how to make their voices heard by their elected representatives. Hear from a panel of top pro-life lobbyists and policy experts on how to effectively navigate the legislative system, from Capitol Hill to your state capitol.

— Register Today

Friday, January 19

March for Life Rally

Join us in Washington, DC for the March for Life Rally. This FREE event features a live concert and inspiring speeches from pro-life leaders – sharing how to stay involved in the pro-life movement all year long. The Rally will begin at 12 pm ET on the National Mall. You can also watch the live-streamed event on our website, Facebook, and YouTube channel.

March for Life

This is the main event! The March for Life will begin immediately following the Rally - usually around 1 p.m. - starting between 12th and 14th Streets. We will march peacefully up Constitution Ave. to the steps of the U.S. Capitol Building.
After marching, consider attending the Silent No More testimonies outside the Supreme Court, visiting your Representative to advocate for life, or proceeding past The Capitol to help the flow of oncoming marchers.

— See Why People March

Rose Dinner Gala

An evening of inspiration and fellowship, the Rose Dinner is the perfect way to conclude your March for Life experience in our Nation's Capital.

— Learn More about the Rose Dinner

March for Life Rally

SPEAKERS



Benjamin Watson



Pastor Greg Laurie and Cathe Laurie



Jean Mona Davis



Bishop John (Abdalah)



Aisha Taylor



Jim Daly



Joanna Mancini



Danny Gokey



Antonio de Mello



There are many events happening around Washington D.C. surrounding the March for Life. These events are not sponsored by the March for Life, but we wanted to make you aware of them during your trip to the Nation's Capital.

Check back in the weeks leading up to the March for Life as related events are continually added to this page! To have your event listed, please reach out to Dawn Fitzpatrick.

MUSEUM OF THE BIBLE

January 17-21, 2024
400 4th St SW Washington, D.C. | 10:00 AM – 5:00 PM

Washington Revelations: A Monumental Scavenger Hunt of Biblical Proportions Search out Biblical references throughout D.C. to find where the Bible hides in plain sight! Plus, bring your finished answers back to the Museum of the Bible to claim your prize – a free pass to relive the Washington Revelations virtual fly over.

January 18 – The Race is On!

The Great Expedition Day at the Museum of the Bible. Our educators at "Mission Command" will launch guests of all ages on this immersive experience - The Great Expedition! Like on *The Amazing Race*, your group will compete to solve clues and complete tasks throughout the museum, including our Scripture and Science exhibit. Additional $4.99 for the Great Expedition Day.

Museum admission just $10 with discount code: MFL

Learn more at www.museumofthebible.org

LIFE IS VERY GOOD

January 18-19 @2024
EagleBank Arena | 7:30 PM – 9:45 PM Thursday 9:00 AM – 11:00 AM Friday

The Diocese of Arlington invites you to join thousands of participants from across the country at Life is VERY Good on January 18 and 19, 2024. Life is VERY Good will be held at EagleBank Arena, which has a capacity of 8400, so we welcome groups of any size! The Evening of Prayer on January 18 is an opportunity to pray for the success of the March for Life in changing our hearts and those of others in this country. The Morning Rally on January 19 prepares us to take to the streets of Washington D.C. to make our voices heard as we proclaim the gospel of life. We hope to see you at one or both of these events to proclaim that "Life is VERY Good!"

Learn more at arlingtondiocese.org/livg/

LAW OF LIFE SUMMIT (11TH ANNUAL)

January 18, 2024
Westin Downtown D.C. Potomac Ballroom | 1:00 PM – 4:00 PM

The Law of Life Summit has been referred to as the best kept secret during the week of the March for Life. At the Summit you will hear from leaders, lawyers, media personalities and advocates. The Summit ties together law, media and strategy to energize and restore the movement in post Roe America.

The *2024 Law of Life Summit* will include the famous firehose session providing a snapshot of pro-life America with multiple guest-speakers, a VIP panel for messaging in media, and finally our keynote panel hosted by the *Thomas More Society*, featuring nationally recognized and distinguished attorneys. The full program will be announced in early January.

Registration is free with premium tickets available. Space is limited. Register here:
https://lawoflifesummit.regfox.com/2024-law-of-life-summit-dc

LIFE FEST

January 19, 2024
The Westin Downtown D.C. | 7:00 AM – 10:30 AM

Let's return to the heart of the matter.

We are at a critical moment in history that demands a new vision. The fall of Roe is not the end. Let's renew our commitment to love. Let's be agents of healing in a broken world. We need each other.

For more information see www.lifefestrally.com/

NATIONAL PRAYER SERVICE

January 19, 2024
DAR Constitutional Hall | 8:30AM– 10:30AM

Start the day of the March for Life at the 29th Annual National Prayer Service on Friday, January 19, 2024 at DAR Constitution Hall, 1776 D. St | 18th and D| Washington, DC, from 8:30-10:30am. Catholic Mass at 7:30 a.m. We will present the Pro-Life Recognition Award to Bishop Joseph Strickland of Tyler, TX. MarkLee Dickson, founder of the Sanctuary Cities for the Unborn Initiative, Sr. Deirdre Byrne, POSC and Mark Houck. It will be a time of prayer, praise, music and inspiring speakers. Pro-Life Leader Frank Pavone will deliver a powerful pro-life message. Sponsored by Priests for Life and the National Pro-Life Religious Council. Admission is free.

For more information see www.NationalPrayerService.com

TRAVEL

Airports

The most convenient way to get to D.C. is by flying here. There are two airports serving the D.C. area, both are Metro accessible:

- **Washington Dulles Airport**—in Dulles, VA; an easy 25-mile drive from downtown D.C.
- **Ronald Reagan Washington National Airport**—in Crystal City, VA; just 5 miles from downtown D.C.

Buses

Charter buses are also a great way to get to D.C. However, they present certain parking problems and do require permits. Charter buses can be parked at the following locations: **Union Station** or the **Basilica of the National Shrine of the Immaculate Conception**.

— Obtain your bus permits

Interested in organizing a bus trip?
Special Event Management handles VIP transportation for the March for Life and has arranged hundreds of bus trips for groups coming to the March from all over the US.
To receive a customized quote, please reach out to Chuck Genrich at: [redacted]
Phone: [redacted]
Toll-Free: [redacted]
Website: www.specialeventteam.com

Metro

Whether you want to do some sight-seeing or come straight to the March, the easiest way to get around D.C. is through our extensive Metro system. Gathering with your fellow pro-life marchers in D.C. is easy. On the day of the March itself, simply take the metro to one of the three stops within an easy walking distance from the rallying location: **Federal Triangle, Smithsonian, Metro Center**.

— Order, register, and add value to your metro card

HOTEL INFORMATION

IMPORTANT NOTE:

On October 6, 2023, our host hotel, the Renaissance DC Downtown Hotel will officially be rebranded and renamed the Westin DC Downtown Hotel.

The Westin DC Downtown Hotel (*previously named Renaissance DC Downtown Hotel)* is located across from the Washington Convention Center, between Capitol Hill and the White House. The hotel is 25 miles from Washington Dulles Airport and 5 miles from Ronald Reagan Washington National.

WESTIN DC DOWNTOWN HOTEL (Formerly Renaissance Hotel)

999 9th St NW

Washington, D.C. 20001

MFL Reservations:

Individual Reservations: **BOOK HERE!**

Metro location: Gallery Place/Chinatown

The March for Life has guaranteed the bulk of our rooms for three nights, Wednesday, January 17, Thursday, January 18, and Friday, January 19, 2024. We also have some rooms blocked before and after these dates for those wishing to extend their time in Washington, D.C.



KENTUCKY MARCH FOR LIFE

MICHIGAN MARCH FOR LIFE

NEW JERSEY MARCH FOR LIFE

NORTH DAKOTA MARCH FOR LIFE

OHIO MARCH FOR LIFE

PENNSYLVANIA MARCH FOR LIFE

VIRGINIA MARCH FOR LIFE

ARIZONA MARCH FOR LIFE

CALIFORNIA MARCH FOR LIFE

COLORADO MARCH FOR LIFE

CONNECTICUT MARCH FOR LIFE

GEORGIA MARCH FOR LIFE

ILLINOIS MARCH FOR LIFE

Priests for Life - Website Images:

2024 March for Life, Washington, DC and Walk for Life, San Francisco

Priests for Life organizes and helps to lead a number of events associated with the annual **March for Life** in Washington and **Walk for Life West Coast** -- including the Planned Parenthood Protest, the National Prayer Service, the Youth Rally and the Silent No More Gatherings. Below, you will find information about those and similar events and how you can connect with us! Please spread the word!

For those who cannot attend the events, follow the events live at **www.EndAbortion.TV** *and on the various social media platforms linked from there!*

2024 March for Life, Washington, DC

Thursday, January 18

9-11 a.m.: Prayer and protest at Planned Parenthood killing center in DC at [redacted]

12:30 - 2:00 p.m.: Activist event an hour and a half after Planned Parenthood event ends. Co-sponsored by: Priests for Life, Stand True, Christian Defense Coalition, The White Rose Resistance and Created Equal. Speakers confirmed so far will be Bryan Kemper, Frank Pavone, A.J. Hurley, Pat Mahoney. More speakers and exact location to be announced.

Friday, January 19

8:30 -10:30 a.m. - National Prayer Service at DAR Constitution Hall, 1776 D St., NW (18th and D St). **Catholic mass at 7:30 am.** For more information, see www.NationalPrayerService.com. **Frank Pavone will deliver a strong pro-life message to rally the crowd and we will honor Bishop Joseph Strickland, Mark Lee Dickson, Sr. Deidre Byrnes, POSC and Mark Houck.** Admission is free. Help us fill the beautiful hall with prayers and song as we prepare to go out and march in defense of the most defenseless among us. The event consists exclusively of two worship services: The Mass and the interdenominational prayer service.

1:00 p.m. - March for Life: Members of the Silent No More Awareness Campaign (a joint project of Priests for Life and Anglicans for Life) march together, holding their signs showing regret for their abortions.

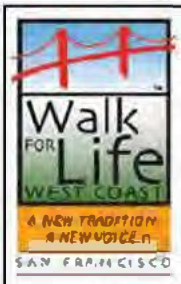
2:00 p.m. (approx.) - Once the marchers begin to reach the end of the March route, the **Gathering of the Silent No More Awareness Campaign** begins in front of the Supreme Court. Testimonies are given by mothers and fathers who have lost children to abortion, as well as by other family members who have been impacted by abortion. The public is asked to come and support these brave women and men who give their testimonies, and to spread those testimonies which can be found at www.AbortionTestimonies.com.

Saturday, January 20

8:00 a.m. - 7:00 p.m.: Priests for Life is a co-sponsor of the National Pro-life Summit. Grand Hyatt, 1000 H Street NW, Washington, DC. Stop by to meet our leaders and staffers.

Monday, January 22 (The actual anniversary of Roe v. Wade)

11 a.m. to 1 p.m. - Prayers and remembering the victims of Roe v. Wade - in front of the Supreme Court. Flowers will be laid on the steps of the Supreme Court at the conclusion.



2024 West Coast Walk for Life, San Francisco, CA

Saturday, January 20

8:00-9:00 am: Planned Parenthood Protest, 1522 Bush Street near Van Ness Avenue, San Francisco. Frank Pavone and other leaders will speak.

8:30-9:30 am: Pro-life Leader Frank Pavone will be on the Plaza of St. Mary's Cathedral, 1111 Gough Street, San Francisco greeting and talking with marchers prior to the 930AM Walk for Life Mass.

10:45 a.m. - 12:15 p.m. - Civic Center Plaza– Pro-life Leader Frank Pavone, Pastoral Director of the Silent No More Awareness Campaign, will address the crowd and lead the members of Silent No More who will share their testimonies of the pain that follows abortion and the healing that is available. This is the same location as the Walk for Life Rally.

12:30 - 1:30 pm- Walk for Life Rally at the Civic Center Plaza, San Francisco.

1:30 pm - West Coast Walk for Life -- Members of the Silent No More Awareness Campaign will march together.

Archdiocese of New York -Wwebsite Images:

March For Life – Washington D.C.
Friday, January 19, 2024

What Is the March for Life in Washington D.C.?

The March for Life in Washington D.C. began as a grassroots response of pro-lifers nationwide to Roe v. Wade, the 1973 Supreme Court decision legalizing abortion throughout the 9 months of a woman's pregnancy. Although Roe v. Wade was overturned in the landmark Dobbs vs Jackson decision, the battle of life continues and the March for Life is more important than ever! Inspired by the Holy Spirit's gift of Reverence, Catholics and all people of good will come together at our Nation's Capital to pray and publicly intercede on behalf of the unborn, their parents, families, our communities, our nation and its leaders – that this prayerful presence may open hearts, minds, souls to the fullness of the Gospel of Life in our lives and laws.

Bus Pilgrimages to the March for Life

Below are the bus trips that confirmed for 2024 - keep checking back as we expect more buses to be added:

- **Brooklyn/Queens**
- **Bronx**
- **Dutchess**
- **Manhattan**
- **Orange County**
- **Putnam County**
- **Rockland County**
- **Staten Island**
- **Westchester**

March for Life Mass for Archdiocese of New York Pilgrims

Join pilgrims from throughout New York who have traveled to Washington, D.C. for the March for Life at the New York Pilgrim Mass at 10:30am at St. Patrick's Church.

March for Life, Washington D.C.
January 19, 2024 @ 10:30AM

NY PILGRIM MASS

St. Patrick's Church
619 10th St NW
Washington D.C.



Opportunities for Local Prayer and Witness

If you are not able to attend the March for Life in D.C. this year, we encourage you to participate in local prayer events or peaceful, prayerful witness outside of an abortion clinic near you. January 22nd remains the National Day of Prayer and Fasting for the legal protection of the unborn.

Consider witnessing at one of the following abortion clinics:

- **Bronx**
- **Manhattan**
- **White Plains**
- **Newburgh**
- **Spring Valley**
- **Staten Island**

Life Fest

Life Fest is a Mass and Rally hosted by the Sisters of Life on the morning of the March for Life. January 19th, from 7:30am-10:30 am in Washington, D.C. It includes music, prayer and dynamic speakers. Perfect for youth and young adults. For more information, visit www.lifefestrally.com.

WHY LIFE FEST? BECAUSE EVERY HUMAN PERSON IS MADE IN GOD'S IMAGE. BECAUSE OUR WORLD IS CRYING OUT FOR HEALING. BECAUSE LOVE IS THE ANSWER. YOU HAVE BEEN CHOSEN FOR THIS TIME. A NEW MOVEMENT IS RISING UP. WILL YOU?



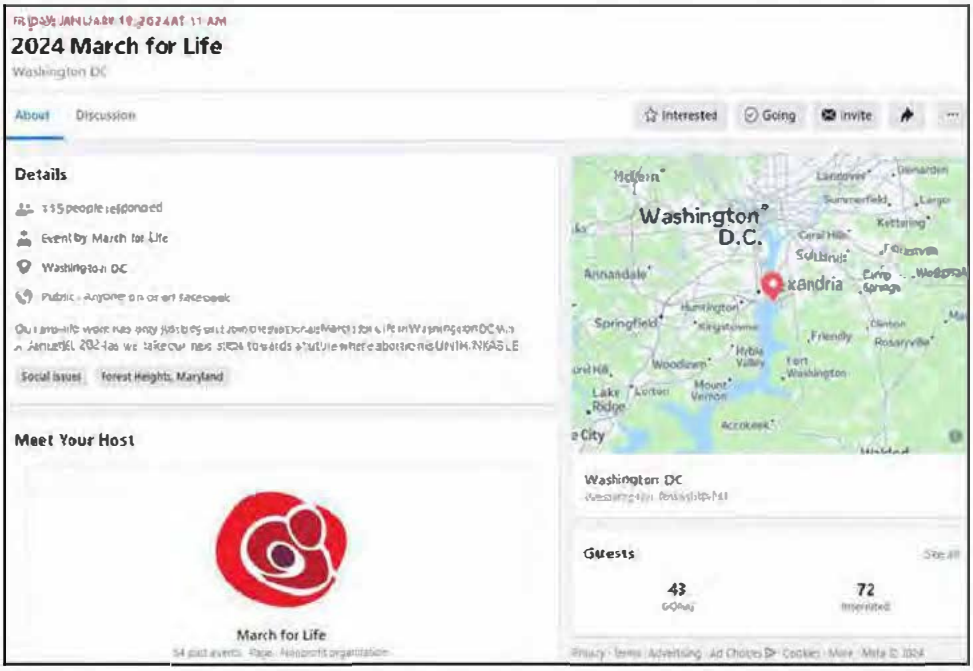
National Prayer Vigil for Life

The National Prayer Vigil for Life is a pro-life prayer vigil held on the eve of the March for Life each January. It is held at the Basilica of the National Shrine of the Immaculate Conception in Washington, D.C. The Opening Mass will be celebrated by Bishop Burbidge on Thursday, January 18th at 5:00 p.m. and will be immediately followed by a 7:00-8:00 p.m. Holy Hour for Life. Throughout the night, Holy Hours will be led by various bishops throughout the country and available on livestream. A closing Mass for the Vigil will be celebrated at 8am on Friday morning. Typically, over 20,000 pilgrims from across the nation pray through the night for an end to abortion and a greater respect for all human life.

The Vigil Program will be televised by EWTN and livestreamed on the Basilica's webpage so millions can participate remotely.



Facebook Images:

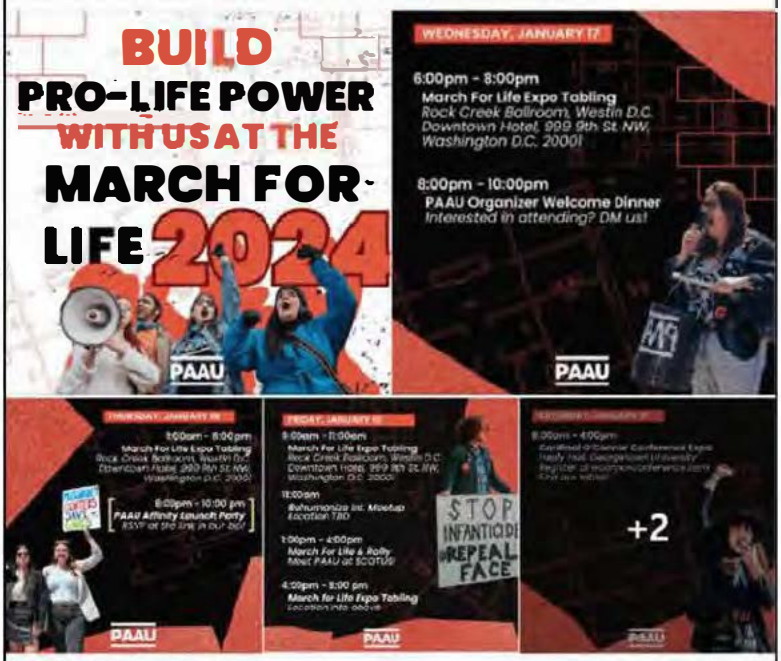




Progressive Anti-Abortion Uprising
December 27, 2023 at 11:55 AM

What is PAAU doing for the M4L? It's all in this post. BE THERE!!!!

RSVP for Affinity Launch event here: https://forms.gle/7SxQxhfTioKfu4h78



11 4 comments 1 share

LifeSiteNews
@LifeSite

FULL LIST: Events surrounding the 2024 March for Life

#MarchforLife #ProLife #abortion



11:30 AM · Jan 3, 2024 · 506 Views

2 1

BUILD PRO-LIFE POWER WITH US AT THE MARCH FOR LIFE 2024

WEDNESDAY, JANUARY 17

9:30am - 10:30am

PAAU Protest at the DNC

[redacted]

6:00pm - 8:00pm

March For Life Expo Tabling
Rock Creek Ballroom, Westin D.C. Downtown Hotel, 999 9th St. NW, Washington D.C. 20001

THURSDAY, JANUARY 18

12:00pm - 1:00pm

PAAU Planned Parenthood Protest and Sidewalk Counseling

[redacted]

8:00pm - 10:00 pm

PAAU Mixer
RSVP at the QR code below!

9:00am - 8:00 pm

March For Life Expo Tabling
Rock Creek Ballroom, Westin D.C. Downtown Hotel, 999 9th St. NW, Washington D.C. 20001

RSVP FOR THE PAAU MIXER HERE

FRIDAY, JANUARY 19

11:00am - 12:00pm

Rehumanize Int. Meetup
Corner of 12th and Constitution Ave.

2:00pm - 4:00pm

PAAU Rally at SCOTUS
Meet PAAU there after the March!

9:00am - 11:00am, 4:00pm - 8:00 pm

March for Life Expo Tabling
Rock Creek Ballroom, Westin D.C. Downtown Hotel, 999 9th St. NW, Washington D.C. 20001

SATURDAY, JANUARY 20

8:00am - 4:00pm

Cardinal O'Connor Conference Expo
Healy Hall, Georgetown Universitye
Register at oconnorconference.com
Find our table!



EXHIBIT 037

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "[redacted] (SF) (FBI)" <[redacted]>, "Michelle Davidson" <[redacted]@prochoice.org>
Subject: FW: FBI Contact Needed - California
Date: Wed, 17 Nov 2021 13:03:07 -0500
Importance: High

[redacted] –
How the heck are you?
I want to connect you with Michelle Davidson (cc'd), who is the Security Director for the National Abortion Federation [NAF] (Michelle – did I get your title correct?).
Among other things, NAF provides security services for abortion clinics nationwide.
Michelle has been a wonderful contact for me as it relates to FACE Act investigations. She has been an MVP bringing incidents to my attention, often in real-time, which usually result in an investigation/prosecution.
She's multi-talented, super smart, and a great resource for any investigations we have that involve clinic violence (in which we've seen a recent spike).
I wanted to connect you with Michelle while she is in SF doing some good work.

Michelle–
[redacted] is a bona fide super-agent (I know this from personal experience).
I'm confident you can lean on him for anything FACE Act related, for outreach, and for additional contacts beyond SF.

Let me know if either of you need anything.

Thanks,
SP

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Wednesday, November 17, 2021 11:59 AM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: [EXTERNAL] FBI Contact Needed - California
Importance: High

Hey Sanjay,

I'm in northern California to try to connect with University of California/California State University campus police and other local LE. Can you help me with the agents responsible for FACE in California? It would be great if I could get a contact for the San Francisco and Sacramento area while I'm here. (I leave on Friday) Sorry for the last minute request. It would be so helpful to connect with a few of them while I'm here so I can facilitate connections with the clinics. I meant to ask for this awhile ago and here I am, scrabbling. Seems to be a theme lately as there is so much going on. I know you're super busy as well and appreciate any help. An intro to US Marshals would be really helpful as well if possible.

Background – California passed a bill recently requiring UC/SCU student health centers to provide medical abortion services and I'm here to help them mitigate potential anti-abortion harassment.

Thanks!

-Michelle

Also- did you see my email on a RRR in Alexandria? I'm looking for more info on that for you.

EXHIBIT 038

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Michelle Davidson" <[redacted]@prochoice.org>
Cc: "[redacted] (PG) (FBI)" <[redacted]>
Subject: RE: WV FBI Contact
Date: Fri, 16 Jul 2021 16:47:45 -0400
Importance: Normal
Inline-Images: image004.png; image001.jpg

Hey, Michelle–
CC'd on this email is Special Agent [redacted].
He is the rock star FBI agent whom you can connect with about the letters sent to the clinic in Charleston.
I fwd'd the letters and email to Jim that you sent me.

[redacted]– Michelle is the Security Director for the National Abortion Federation. Michelle is an all-around superstar who has been a valuable resource for me in my role as the national FACE Act guy.

I'll let the both of you connect re: Charleston, and if anything pops, definitely let me know!

Thanks,

SP

From: Michelle Davidson [redacted]@prochoice.org>
Sent: Wednesday, July 14, 2021 9:37 AM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: WV FBI Contact

Hey Sanjay,

Can you help me get in touch with the right poc for West Virginia? Ties into the letters they received and they want to meet the new person. Thanks!

Stay safe,

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

naf NATIONAL ABORTION FEDERATION

[redacted]
Direct line: [redacted]



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 039

From: "Fitzgerald, Paige (CRT)" <[redacted]>
To: "Buchko, John (CRT)" <[redacted]>
Subject: RE: Ethics question
Date: Wed, 01 Nov 2023 14:22:48 -0400
Importance: Normal
Inline-Images: image001.png

I don't know for sure, but my strong guess is that it is not a federal grant.

From: Buchko, John (CRT)d<[redacted]>
Sent: Wednesday, November 1, 2023 1:54 PM
To: Fitzgerald, Paige (CRT) <[redacted]>
Subject: RE: Ethics question

Paige,

Do you know whether they are seeking a federal grant?

John

From: Fitzgerald, Paige (CRT) <[redacted]>
Sent: Tuesday, October 31, 2023 5:22 PM
To: Buchko, John (CRT)d<[redacted]>
Subject: Ethics question
Importance: High

Hi, John –

We received the below request from our POC with the National Abortion Federation, one of the three main reproductive health care provider (RHCP) groups in the country (the others are Planned Parenthood and Feminist Majority). We have worked with NAF for decades. NAF regularly refers potential FACE Act violations and other threats to RHCPs, helps us liaise with clinics and staff, lets us know about upcoming events that might result in security concerns so we can notify FBI and USMS, etc. Because they are NGOs, they can poke around on the internet in ways that we can't, and they have shared leads with us, etc. The information flow has always been a one-way street, and they have always been respectful, cooperative, and are frequently quite helpful.

I'm guessing we probably can't do what they are asking, but is there anything that we can do to tell grant folks that they are totally legit and they have been valuable to our law enforcement efforts? Happy to jump on a call if that would be easier. Sanjay was in trial, and just sent this to me today and their response is due tomorrow. . .

Thanks,
Paige

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Tuesday, October 24, 2023 5:37 PM
To: Patel, Sanjay (CRT)d<[redacted]>
Subject: [EXTERNAL] Request
Importance: High

Hey Sanjay,

I have a request that I hope you could squeeze into your very busy schedule. We have the opportunity to submit a proposal for grant funds that would support the already existing security work I do in the DMV for providers. I'm hoping you could write a short impact statement, on DOJ letterhead, and in your own words, on the importance of the NAF Security Departments work and the impact on provider safety in the DMV. You could also talk about how we work together and some of the outcomes of our efforts if you feel inclined.

I know you have a lot going on but a statement from you would have a big impact on the proposal. I also completely understand if it's not possible so don't worry or stress - just let me know.

Hope your good - looking forward to any updates on the next trial you may have. Let's chat soon!

-M

Michelle Davidson

Director, Security
Pronouns: Any (no preference) or just Michelle

NAF Security
[redacted]
Direct line: [redacted]
**This line is not reliable for text message use*

"Don't ever let them steal your joy" - Brandi Carlile

I respect that your working hours may be different from mine and I support your healthy work/life boundaries. Only respond when you have the time and capacity.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 040

To: "Healy, Megan (USAND)" <[redacted]>
Subject: possible Fargo civil rights matter
Date: Mon, 16 Nov 2020 17:34:23 -0500
Importance: Normal
Inline-Images: image001.jpg; image002.jpg; image003.jpg; image004.jpg

---

Hi, Megan.
Shelly Beer from the Civil Rights Division suggested that I contact you about a potential caper in your district.
Below is an email fwd that I received from the National Abortion Federation (NAF) security director regarding damage to a Fargo abortion clinic.
Assuming that the motive behind the vandalism was because the clinic provides abortion services, it would fit under 18 USC 248(a)(3) (FACE Act).
It would be a misdemeanor, but the interest in pursuing this is because a subsequent / future charge would be a felony.
NAF is obtaining the security video from the vandalism for me.
If you're interested, I'd like to investigate this matter with your office.
There has been a significant up-tick nationwide in FACE offenses directed at abortion clinics, and Fargo is one of several incidents I'm looking into.
If you have time for a call this week, I'd love to connect.
Thanks.
Sanjay

Sanjay Patel
Trial Attorney
Criminal Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave. NW – [redacted]
Washington, DC 20004
● – [redacted]
C – [redacted]

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Monday, November 2, 2020 11:43 AM
To: Fleisher, Aaron (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: [redacted] - Fargo - Vandalism (FW)

From: [redacted] <[redacted]>
Sent: Monday, November 2, 2020 11:40 AM
To: Michelle Davidson <[redacted]@prochoice.org>; [redacted] (MP)(FBI) <[redacted]>; [redacted] <[redacted]>; [redacted] <[redacted]>; [redacted]@cityoffargo.com
Subject: [redacted] - Fargo - Vandalism

On Saturday, October 31st at 12:32am a [redacted] climbed the fire escape at [redacted] Clinic & did serious damage to the fire escape, broke a storm window accessible to that fire escape and apparently may have done some

damage to an electrical box that doesn't belong to our building, but the one adjacent.

The Fargo Police Department was notified on Saturday afternoon when the damage was discovered. Case # [redacted] was initiated by Officer [redacted]. It's possible that the suspect may have damaged a vehicle parked in the [redacted] lot across the street from the clinic. The suspect can be seen, although not well, from our video cameras near the vehicle that was damaged.

I am in the process of backing up the video footage showing the individual approach by way of the east side of the building. There are multiple camera angles, so it takes some time to back up.

After he left the fire escape, he left the area by heading south, he turned toward the building & spent some time gesturing, apparently yelling & flipped his middle finger (with his left hand) toward the building. He then spent quite some time in the drive-up area of the Alerus bank building behind our building, also gesturing wildly & seeming to yell a lot towards their teller window. I am sure they likely have better footage of his face. We also discovered that there is a camera attached to the building next door to us on the west side that likely caught the entire incident of him doing the damage (our cameras are not facing the fire escape).

We could see he was [redacted]. Honestly, it looked like [redacted]. He left via the south & turned west onto [redacted] avenue around 12:50am. I am hopeful that other cameras downtown caught him or that he interacted with another officer in some way. Officer [redacted] is out until Wednesday of this week.

Please let me know if you have any questions or want copies of the footage. I generally have to share it via dropbox as files I have shared in the past are too large for any other medium.

Thanks,

[redacted]
[redacted]
[redacted]
She/Her/Hers
Clinic Director, [redacted]
[redacted]
[redacted]
@[redacted]
Abortion Care Network
Member

WIN fund
NORTH DAKOTA WOMEN IN NEED
ABORTION ACCESS FUND

Board Member, ND WIN (Women in Need) Abortion Access Fund

EXHIBIT 041

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Emma Goldberg" <[redacted]@prochoice.org>
Cc: "Michelle Davidson" <[redacted]@prochoice.org>
Subject: RE: Concerning tweet regarding Planned Parenthood - NAF
Date: Mon, 12 Apr 2021 18:51:54 -0400
Importance: Normal
Inline-Images: image001.jpg; image002.jpg; image003.jpg

Thanks, Emma/Michelle.
I've fwd your email to FBI HQ, and asked for their immediate attention to this.
Also, I wanted to let you both know that I have been designated the DOJ National FACE Act Task force director.
If you have time later this week for a call, I'd like to chat about what this means, and explore outreach initiatives.
Friday works best for me.
Also, you can take Paige off of the email distribution list. now that I have been given this position.
Thanks,
SP

From: Emma Goldberg <[redacted]@prochoice.org>
Sent: Monday, April 12, 20214:38 PM
To: Patel, Sanjay (CRT)<[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Cowall, Laura (CRT) <[redacted]>; Smith, Katelyn (CRT) <[redacted]>
Cc: Michelle Davidson <[redacted]@prochoice.org>
Subject: Concerning tweet regarding Planned Parenthood - NAF

Hi all,

We wanted to make you aware of a concerning tweet that was posted this morning and pass along the alert we received below. We're not familiar with this individual and do not know where he is located, but are alarmed by the language used. Please reach out if you have any questions or if we can assist further.

> Twitter user [redacted]" (@[redacted] posted the following: "There are 3 pipe bombs hidden inside my closest planned parenthood, you have 12 hours." The post was not in response to any previous tweets, nor does it mention any other Twitter users, and appears unprovoked.
>
> The username "[redacted]" (@[redacted]) was not connected to any other usernames and a public records of the user did not reveal any information. An thorough scrub of the user's profile did not uncover any previous mentions of Planned Parenthood or the topic of abortion. The user currently has less than 1,000 tweets and their profile appears to have been created sometime in February 2021. No other potential identifiable information was found on the user's profile.
>
> The user often posts support of Neo-Nazi beliefs, as well relatively threatening language against those of different political views or religious beliefs; however, these posts often appear to be made in jest. Although the user's mention of Planned Parenthood is threatening and concerning, the post does not mention any specific locations or personnel, and the user does not appear to intend to act on their statements; however, this cannot be confirmed. While it does not appear that the users intend to act on their hostile comments, this type of language does have the ability to evolve and motivate individuals to take direct action in various forms such as protests, disruption or violence.
>
> *Twitter Images:*





Emma Goldberg
Pronouns: she, her, hers
Security Operations and Opposition Research Coordinator
National Abortion Federation

(T) [redacted]
(E) [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is

prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 042

From: "Fleisher, Aaron (CRT)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: Obstruction Post-Lauren Handy-DMV
Date: Tue, 18 Aug 2020 11:39:42 -0400
Importance: Normal
Inline-Images: image001.png; image002.png; image003.png

Great—thanks, Sanjay!

Aaron Fleisher
Trial Attorney
Special Litigation Section, Civil Rights Division
U.S. Department of Justice
Phone: [redacted]

From: Patel, Sanjay (CRT)
Sent: Tuesday, August 18, 2020 11:38 AM
To: Fleisher, Aaron (CRT) <[redacted]>
Cc: Fitzgerald, Paige (CRT) <[redacted]>; Mody, Saeed (CRT) <[redacted]>
Subject: RE: Obstruction Post-Lauren Handy-DMV

Hey, Aaron.
I've been in touch with Michelle and I'm looking into this.
I'll keep you posted.
SP

From: Fleisher, Aaron (CRT)
Sent: Friday, August 14, 2020 9:43 PM
To: Michelle Davidson [redacted]@prochoice.org>; Fitzgerald, Paige (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon <[redacted]@procnoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: RE: Obstruction Post-Lauren Handy-DMV

Hi, Michelle.

If she actually ends up causing any obstruction, please let me know. I can't speak for Paige and Sanjay, but we on the civil side might be interested in looking further at that.

Thanks,
Aaron

Aaron Fleisher
Trial Attorney
Special Litigation Section, Civil Rights Division
U.S. Department of Justice
Phone: [redacted]

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Friday, August 14, 2020 4:08 PM
To: Fleisher, Aaron (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Patel,

Sanjay (CRT) <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Obstruction Post-Lauren Handy-DMV

Hi DOJ Team,

Please see the following post below.
Handy's hearing for her previous RRR arrest is scheduled for 8/18. I wonder if there is any way we can get this to the prosecuting attorney? We will alert our members and LE contacts in the DMV area. Let us know if we can do anything else. I hope you all have a good weekend.

-Michelle

[redacted]



[redacted]



Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
O/C:

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 043

From: "Fleisher, Aaron (CRT)" <[redacted]>
To: "Cowall, Laura (CRT)" <[redacted]>, "Fitzgerald, Paige (CRT)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>
Subject: FW: Invasion- Silver Spring
Date: Tue, 02 Feb 2021 07:51:28 -0500
Importance: Normal
Inline-Images: [redacted]

I'm looping Laura in, for her awareness. I know an FBI contact replied quickly. Could you keep us informed, Paige and Sanjay, of any developments?

On that note, I'm sorry to say that I once again cannot make the monthly meeting we set up, which is scheduled for this afternoon at 3pm. Laura, I'm not sure if you're available. If not, Sanjay, please let us know if you want to reschedule, or if you'd rather just provide any updates via email. I don't think we have anything case-related on our side. The only update I would provide is a personnel one, which is that, as Laura knows, I'm going to be leaving SPL[redacted]. I've accepted a job with [redacted]. We're working to identify a new FACE contact in our Section and will let you know once we do, but in the meantime, you can always contact Laura with anything FACE-related. I'll reach out to Michelle separately in the coming days to let her know, and will copy you all.

Thanks,
Aaron

Aaron Fleisher
Trial Attorney
Special Litigation Section, Civil Rights Division
U.S. Department of Justice
Phone: [redacted]
Pronouns: he/him/his

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Saturday, January 30, 2021 10:06 AM
To: [redacted] (WF) (FBI) <[redacted]; [redacted]; [redacted] (WF) (FBI) <[redacted], Fleisher, Aaron (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Cc: Emma Goldberg <[redacted]@prochoice.org>; Melissa Fowler <[redacted]@prochoice.org>
Subject: Invasion- Silver Spring
Importance: High

https://www.facebook.com/[redacted]

There is an active invasion/blockade at [redacted] Planning [redacted] I have spoken with [redacted] and everyone inside is in lock down and sheltering in place. Police were called 20 minutes ago have not arrived yet. Lauren Handy and unknown others are inside. Patients are not able to access. [redacted] is live streaming.

Stay safe,

Michelle Davidson
Director, Security

All pronouns are respectfully accepted

(They/Them, He/Him, She/Her)

National Abortion Federation

[redacted]

O/C[redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 044

From: Michelle Davidson <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: Jonathan Darnell
Date: Tue, 08 Dec 2020 14:42:01 -0500
Importance: Normal

Working on this now.

From: Patel, Sanjay (CRT)d<[redacted]>
Sent: Tuesday, December 8, 2020 2:14 PM
To: Michelle Davidson <[redacted]@prochoice.org>
Subject: Jonathan Darnell

Hey, Michelle–
I can't recall if you ever shared anything with me (either through an attachment or via Dropbox) about Jonathan Darnell's arrest at the other/second clinic from [redacted]?
If you did, can you re-send that to me?
Thanks.
SP

EXHIBIT 045

2021

Operation Save America National Event

Resource Guide

PHOENIX, ARIZONA
JUNE 23 - 26, 2021

NATIONAL ABORTION FEDERATION

Contents

General Information 4
Schedule of Events 4
Hotel Information 4
Relevant Arizona Ordinances and Statutes 5
Facility Ordinance 5
Residential Picketing Statutes 5
Freedom of Access to Clinic Entrances (FACE) Act Fact Sheet 6
Anti-Choice Individuals 13
[redacted] 13
[redacted] 16
[redacted] 21
[redacted] 23
[redacted] 25
[redacted] 27
[redacted] 30
[redacted] 32
[redacted] 34
[redacted] 36
[redacted] 38
[redacted] 41
Eva Edl 44
[redacted] 47
[redacted] 51
[redacted] 54
[redacted] 56
[redacted] 59
[redacted] 61
[redacted] 65
[redacted] 67

Heather Idoni 70
[redacted] 72
[redacted] 74
[redacted] 77
[redacted] 80
[redacted] 82
[redacted] 84
[redacted] 86
[redacted] 88
[redacted] 90
[redacted] 92
[redacted] 94
[redacted] 96
Derin Stidd 98
Jason Samuel Storms 101
[redacted] 104
[redacted] 107
[redacted] 111
[redacted] 113
[redacted] 115
Calvin "Cal" Zastrow 117
[redacted] 120
Eva Zastrow 122
James "Jimmy" Zastrow 125
Violence and Disruption Statistics Reports 127
[redacted] 127
[redacted]Family Planning 128
[redacted] Family Planning 129
[redacted] 130
[redacted] 131

SENSITIVE INFORMATION:
Do not disseminate without prior written consent

Appendix A 132
Freedom of Access to Clinic Entrances (FACE) Act 132

General Information

Schedule of Events

Wednesday, June 23:

6:30pm: Opening rally at Church of the Redeemer ([redacted])

Thursday, June 24:

Morning: Protest at local clinics
2:30pm: Afternoon session at Desert Hills Bible Church ([redacted])
6:30pm: Evening rally at Desert Hills Bible Church ([redacted])

Friday, June 25:

Morning: Protest at local clinics
2:30pm: Afternoon session at Desert Hills Bible Church ([redacted])
6:30pm: Evening rally at Desert Hills Bible Church ([redacted])

Saturday, June 26:

Morning: Protest at local clinics
2:30pm: Afternoon session at Desert Hills Bible Church ([redacted])
6:30pm: Evening rally at Church of the Redeemer ([redacted])

Hotel Information

OSA has blocked off rooms at the [redacted] in Mesa ([redacted])

Relevant Arizona Ordinances and Statutes

Facility Ordinance

[redacted] – PHOENIX, ARIZ., CODE OF ORDINANCES § 23-10.1 (2010).

Relevant Provisions: Creates an eight-foot cease-and-desist bubble zone within a 100-foot buffer zone around any health care facility. The ordinance makes it unlawful for a demonstrator to fail to withdraw, upon a clear request, beyond eight feet from any person in the buffer zone.

Relevant Cases: Sabelko v. City of Phoenix, 68 F.3d 1169 (9th Cir. 1995), reversing 846 F. Supp. 810 (D. Ariz. 1994), vacated and remanded, 519 U.S. 1144 (1997), aff'd 120 F.3d 161 (9th Cir. 1997) (ordinance ruled unconstitutional because it was not narrowly tailored); but see Hill v. Colorado, 530 U.S. 703 (2000) (finding constitutional an eight-foot cease-and-desist bubble zone within a 100-foot buffer zone outside of health clinics).

Residential Picketing Statutes

Arizona – ARIZ. REV. STAT. § 13-2909 (2015).

Relevant Provision: Prohibits residential picketing, defined as "demonstrating before or about the residence or dwelling place of an individual...with intent to harass, annoy, or alarm another person."

Relevant Cases: State v. Baldwin, 908 P.2d 483 (Ariz. Ct. App. 1995) (statute ruled constitutional).

MESA – MESA, ARIZ., CODE OF ORDINANCE §§ 6-12-4, 9-2-1

Relevant Provisions: Prohibits gatherings of two (2) or more people from creating noise which "disturbs the peace and quiet of a neighborhood or a reasonable person of normal sensibilities". Also prohibits the obstruction of any public walkway with personal property.

Freedom of Access to Clinic Entrances (FACE) Act Fact Sheet

What is the Freedom of Access to Clinic Entrances Act?

The FACE Act (see Appendix(A for full text) establishes that it is a federal crime to commit a range of violent, obstructive and threatening activities toward reproductive health care providers and their patients. FACE also authorizes reproductive health care providers, the state attorney general, and/or the federal government to bring civil lawsuits to get injunctions against these activities, or to obtain monetary damages.

Why was FACE passed?

During the 1980s and early 1990s, clinic protests and blockades were on the rise. Violence against abortion providers was escalating across the country, culminating in the murder of Dr. Gunn in March of 1993 outside a Pensacola, FL clinic, and the attempted murder of Dr. Tiller in August of 1993 outside his Wichita, KS clinic. These incidents propelled Congress to pass new federal legislation to address the violence against reproductive health care providers and the denial of access to people seeking their services.

When was FACE passed?

FACE was passed by the U.S. Congress and signed into law by former President Clinton in May of 1994.

What does FACE prohibit?

FACE makes it illegal to intentionally use force, the threat of force, or physical obstruction to injure, intimidate, interfere with, or attempt to injure, intimidate or interfere with somebody who provides or is obtaining reproductive health services. FACE also punishes anyone who intentionally damages or destroys a facility that provides reproductive health services.[1]

What/Who does FACE protect?

- A facility or any person that works at a facility that provides reproductive health services.
- Patients of facilities that provide reproductive health services.
- People accompanying patients, such as a parent, partner, or clinic escort.

What is included in "reproductive health services"?

FACE covers more than just abortion services. "Reproductive health services" include medical, surgical, counseling, or referral services related to pregnancy or the termination of pregnancy provided in a hospital, clinic, physician's office, or other facility that provides reproductive health services.

---

[1] 18 U.S.C.A-§ 248(a).

Who is a "reproductive health care provider"?

Any person that provides reproductive health services. Trained professionals who work in facilities are covered by FACE, as are staff necessary for the safe functioning of a facility, such as security guards, maintenance staff, and patient escorts. People who work in anti-choice reproductive health facilities, such as crisis pregnancy centers, are also covered by FACE. Protesters and sidewalk counselors who try to give information to women outside of reproductive health care facilities are not covered.[2]

What does the phrase "interfere with" mean?

Congress included specific definitions in the Act to clarify the meaning of the law. "Interfere with" means to restrict a person's freedom of movement.

What does the term "intimidate" mean?

Placing a person in reasonable apprehension of bodily injury to him or herself or another.

What is considered a "physical obstruction"?

Rendering the entrance or exit of a facility that provides reproductive health services impassable, or making access into and out of such a facility unreasonably difficult or hazardous.

What is considered a "threat"?

A statement is a true threat if a reasonable person making the statement would foresee that it would be interpreted by the person to whom it is made as a serious expression to inflict harm or assault.[3] In assessing whether a statement is an unlawful threat, the context in which the statement was made must be considered, including the reaction of the listener.

What are some examples of conduct that FACE prohibits?

- Any activity that blocks access to the entrance or obstructs the exit of a facility; blocking people trying to walk towards doors or through parking lots; or making getting in and out of the facility unreasonably difficult or dangerous.
- Acts of physical violence, such as shoving, directed towards clinic staff, escorts or patients.
- Vandalizing a reproductive health care facility by gluing locks or butyric acid attacks.
- Threats of violence. In one case, a man was found to have threatened force under FACE when he parked a Ryder truck outside of a clinic shortly after the bombing of a federal building in Oklahoma City where a Ryder truck had carried the explosives.[4]
- Stalking and threatening a clinic employee or a reproductive health provider.

---

[2] Raney v. Aware Woman Center for Choice, Inc., 224 F.3d 1266 (11th Cir. 2000).
[3] Planned Parenthood vs. ACLA, cert. denied.
[4] U.S. v. Hart, 212 F.3d 1067 (8th Cir. 2000).

- Arson or threats of arson.
- Bombings or bomb threats.

Does the prohibited behavior need to be repetitive to be in violation of FACE?

The Act does not require that the behavior occur more than once. If a singular event is heinous enough in the eyes of a U.S. Attorney, criminal prosecution is likely. However, if the prohibited act is not as severe, proof of repetition will assist in either a criminal or a civil case.

What conduct does FACE not prohibit?

FACE protects protesters' First Amendment right to free speech. Clinic protesters remain free to conduct peaceful protest, including singing hymns, praying, carrying signs, walking picket lines and distributing anti-abortion materials outside of clinics.

Is shouting outside of a clinic a FACE violation?

FACE allows shouting outside of clinics, as long as no threats are made. However, noise levels and interference may violate state or local law.

Is the use of photography or videotaping outside a clinic prohibited under FACE?

Taking somebody's picture, still or moving, without their consent is not an act of force or a threat of force, and is not a FACE violation. However, it may be actionable under state law.

Who can bring a criminal cause of action under FACE?

Only the federal government can file criminal charges under FACE.

What are the criminal penalties under FACE?

The criminal penalties vary according to the severity of the offense and the defendant's prior record of FACE violations. The Act does not provide for minimum sentences; the following are illustrative of the maximum sentences:

- Generally, a first-time offender cannot be sentenced to more than 1 year in prison and a $100,000 fine. For a second or subsequent violation after a prior FACE conviction, a defendant may be imprisoned for no more than 3 years and fined $250,000.
- If the violation is a non-violent physical obstruction, a first time "blockader" faces no more than 6 months in prison and a $10,000 fine. For subsequent violations, the maximum penalty is 18 months and a $25,000 fine.
- The maximum sentence for offenses that result in bodily injury is 10 years. In an offense that results in death the maximum penalty is life imprisonment.

Who can bring a civil cause of action under FACE?

The federal government, state governments, and/or any person or facility that has been the victim of a prohibited action under FACE can bring a civil lawsuit against a violator of FACE.

What are the civil penalties under FACE?

A private plaintiff can obtain temporary, preliminary, or permanent injunctive relief, compensatory and punitive damages, and fees for attorneys and expert witnesses. Rather than collecting compensatory damages, the plaintiff may choose to recover $5,000 for each proven violation.

The federal government or attorney general of your state may also bring a civil suit in federal court on behalf of third parties injured by FACE violations. The court may impose civil fines on the defendants according to the following, note these are all the maximum fines:

- first offense, nonviolent physical obstruction: $10,000
- other first offenses: $15,000
- subsequent offenses for nonviolent physical obstruction: $15,000
- other subsequent offenses: $25,000

Does the FACE Act define areas that the protesters cannot enter?

No, FACE does not explicitly define areas that the protesters are prohibited from entering. However, the Act does provide for injunctive relief in the event of a FACE violation, which could limit the areas in which protest occurs. In other words, to obtain a protest-free buffer zone around a clinic entrance, either the facility or the state or federal government must file a civil lawsuit against individual protesters and/or their sponsoring organizations, prove that their actions violate FACE, and prove that a buffer zone is necessary.

Is the FACE Act constitutional?

Yes, each of the nine federal appeals courts that have heard a FACE case held that FACE is constitutional.[5] The U.S. Supreme Court has chosen not to review these cases, effectively affirming the Act's constitutionality. FACE does not infringe the free speech and free assembly rights of anti-abortion protesters. Instead, the law covers unprotected conduct, such as threats, assault, trespass, and vandalism.

Has the passage and enforcement of FACE assisted in the decrease of clinic violence?

Yes. In 1994, 52% of clinics reported experiencing severe violence (classified as blockades, invasions, bombings, arsons, chemical attacks, stalking, physical violence, gunfire, bomb

[5] Norton v. Ashcroft, 298 F.3d 547 (6th Cir. 2002); U.S. v. Hart, 212 F.3d 1067 (8th Cir. 2000); U.S. v. Gregg, 226 F.3d 253 (3rd Cir. 2000); U.S. v. Wilson, 154 F.3d 658 (7th Cir.1998); U.S. v. Weslin, 156 F.3d 292 (2nd Cir. 1998); Hoffman v. Hunt, 126 F.3d 575 (4th Cir..1997); Cheffer v. Reno, 55 F.3d 1517 (11th Cir. 1996); Terry v. Reno, 101 F.3d 1412 (D.C. Cir. 1996); US v. Bird, 401 F.3d 633 (5th Cir. 2005).

threats, death threats, and murder). That percentage declined 23.5% in 2010. In 2016, the political rhetoric surrounding abortion was largely negative, contributing to an unsafe atmosphere in which 34.2% of clinics experienced violence. [6] Since its passage in 1994, FACE has been instrumental in responding to clinic violence and deterring possible offenders.

What is the status of law enforcement response to clinic incidents?

Between the passage of FACE in 1994 and July 2017, the Department of Justice (DOJ) has obtained the convictions of 92 individuals in 69 criminal prosecutions for violations of FACE. Additionally, DOJ has brought 27 civil lawsuits under FACE, which have resulted in injunctive relief, damages, and/or penalties.[7]

What are other legal devices that can be used by reproductive health care providers?

There are several federal statutes that can be used by providers, in addition to FACE:

- **Threats** (18 U.S.C. § 875 and(§ 876; 18 U.S.C.§ 844).

Criminalizes any threat to kidnap or injure a person that is sent through the mail or by interstate telephone lines. The threat need not be made directly to the intended victim. Although a telephone threat must be made between two states for it to be a federal crime, many states have parallel statewide provisions. Additionally, any threat by telephone or mail that involves the use of explosives to injure a person or destroy property is a federal crime, regardless of the originating point of the threat.

- **Telephone Harassment** (18 U.S.C.§ 223).

Criminalizes any interstate telephone call that is made for the purpose of harassment. This includes calls where no conversation ensues.

- **Extortion** (18 U.S.C. § 1951).

Criminalizes threats of violence used to force someone to relinquish property. Thus, a threat to commit an act of violence against a physician or clinic if either continues to provide abortions is a crime. The statute probably does not protect recipients of health care services who are similarly threatened.

State statutes and local ordinances that may apply:

- **State FACE corollaries**– Some states have enacted their own versions of FACE. This allows states to press criminal charges under state law, giving clinics more options for enforcement. State versions of FACE have been enacted in California, New York and Washington. Colorado, Connecticut, the District of Columbia, Kansas, Maine, Maryland,

[6] 2016 National Clinic Violence Report, Feminist Majority Foundation.
[7] National Task Force on Violence Against Health Care Providers, Department of Justice

Massachusetts, Michigan, Minnesota, Nevada, North Carolina, Oregon, and Wisconsin also have statutes that address harassment at health care facilities.

- **State Bubble/Buffer Zone Laws** – Colorado and Montana have passed buffer and bubble zone legislation. In Colorado, there is an 8-foot bubble zone in which patients cannot be approached without their consent by people distributing leaflets, displaying signs, or attempting to engage in conversation within a buffer zone stretching 100 feet from the entrance to a facility. (In *McCullen v. Coakley*, the U.S. Supreme Court ruled Massachusetts' 18-foot buffer zone around the clinic unconstitutional. However, bubble-buffer zones like Colorado's were upheld in *Hill v. Colorado*.) In Montana, a 36-foot buffer zone exists, within which protesters must remain 8 feet away from patients and clinic workers. After the US Supreme Court decision in *McCullen*, Massachusetts passed a law allowing police to order any individual or group impeding access to a facility to move at least 25 feet from the facility door or driveway for eight hours, or until the facility closes.
- **State criminal laws** against assault, trespassing, and arson.
- **Residential picketing laws** or injunctions related to picketing in residential areas. Such measures may prevent demonstrations not only in front of a targeted residence, but also in front of surrounding residences. They may also limit the number of picketers and the time and duration of the demonstrations to take account of the character of the neighborhood and the privacy of the "target."
- **Loitering laws** – These ordinances can be used if people are congregated in a public street for no apparent reason for an extended period.
- **Noise ordinances** – The Supreme Court has approved of restrictions on noise ("singing, chanting, whistling, shouting, yelling, use of bullhorns, auto horns, sound amplification equipment...") when the noise can be heard inside a clinic during clinic hours.
- **Municipal Ordinances** – Pittsburgh, Pennsylvania enacted a buffer zone ordinance containing two provisions: a 15-foot buffer zone around entrances to health care facilities, and an 8-foot personal bubble zone to prohibit protesters from approaching patients and health care workers. San Francisco, California prohibits individuals from following or harassing an individual within 25 feet of a reproductive health care facility, impeding access to a door of a facility, or shouting or using amplified sound within 50 feet of a facility. Pensacola, Florida prohibits anyone but law enforcement (and in some cases staff and patients) from entering public property within 8 feet of a clinic's property. New York, New York created a 15-foot no-harassment zone around facilities. Harrisburg, Pennsylvania created a 20-foot buffer zone around facility entrances, exits, and driveways. Oakland, California; Sacramento, California; San Diego, California; San Jose, California; Santa Barbara, California; Boulder, Colorado; Denver, Colorado; and Madison, Wisconsin have enacted 8-foot no-approach bubble zones within a 100-foot buffer zone similar to Colorado's bubble-

SENSITIVE INFORMATION.
Do not disseminate without prior written consent
NATIONAL ABORTION FEDERATION

buffer law. Chicago, Illinois has also enacted an 8-foot no-approach bubble zone, but only within a buffer zone of 50 feet.

SENSITIVE INFORMATION:
Do not disseminate without prior written consent

NATIONAL ABORTION FEDERATION

Anti-Choice Individuals

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted].

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities.

[redacted] is closely associated with [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], [redacted] and [redacted], [redacted], [redacted], and [redacted].

Major Known Areas of Travel

Nationwide

Affiliated Groups

Abolish Human Abortion

Apologia Studios

End Abortion Now

Free The States

Operation Save America

Operation Save [redacted]

Searching for Wilberforce

Arrests and Law Enforcement Contact

[redacted].

Activities and Other Info

[redacted] began protesting outside of reproductive health care facilities in 2017 after watching a video of [redacted] from Apologia Studios. He frequently protests at local Jacksonville facilities and schools and is known to travel for larger anti-choice rallies and protests.

November 5, 2019: [redacted] attended the Defenders of Life – [redacted] Freedom Rally.

January 22, 2019: [redacted] spoke at the [redacted] city counsel meeting to lobby for anti-abortion legislation.

2009: [redacted] founded [redacted], a conservative photography and videography company serving primarily faith-based customers. [redacted] has produced several anti-choice videos for known anti-abortion extremist groups.

2004: [redacted] graduated from the [redacted] with a [redacted] in [redacted].

[redacted]icense number: [redacted]

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs:[redacted]
DOB:[redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]

Phone Number: [redacted]
Website: [redacted]
Email:[redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. They have [redacted] children. His [redacted] sons [redacted] and [redacted] and at least [redacted] of his daughters have also participated in protests and clinic blockades. [redacted] and [redacted] have attained minor celebrity status along with publishing[redacted] a faith-based account of their lives.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Dallas PLAN (Pro-Life Action Network)

Operation Save America – [redacted] ([redacted])

Operation Rescue, Dallas/Fort Worth – [redacted] ([redacted])

Arrests and Law Enforcement Contact

[redacted]

[redacted]

Activities and Other Info

In August 2011, [redacted] was [redacted] after he distributed posters with the names and photos of several [redacted] doctors who provide abortions. [redacted]

In July 2006, [redacted] and 700 other members of his organization protested against the student Gay-Straight Alliance at [redacted] in [redacted] at a school board meeting. The meeting concluded with a unanimous vote to shut down the student run organization.

From July 15-22, 2006, [redacted] organized a week long protest at a [redacted] clinic—the last clinic in [redacted]—in an effort to get it to close. Demonstrators also protested in front of the State Capitol and individuals rallied against abortion, homosexuality, and Islam—destroying a Koran in the process.

On January 25, 2006, [redacted] received a citation for violating a [redacted], [redacted], noise ordinance during a lunch-hour protest.

In April 2005, [redacted] addressed the [redacted], [redacted], mayor and city council to voice his opposition to "[redacted] Pride," a weekend-long gay pride event. In May 2005, he and his

followers protested at the event; he later attended an event held by local gay rights groups on how to deal with opposition protesters' tactics.

In 2002, [redacted] moved from [redacted] to the [redacted], area where he continues to [redacted] Operation Save America. An office is still maintained in [redacted].

In 2001, [redacted] and Operation Save America organized the "Summer of Mercy Renewal" in [redacted], to mark the 10-year anniversary of the first "Summer of Mercy" in 1991.

From October 15-17, 1999, [redacted] spoke at the Pro-Life Action League conference in [redacted].

In 1999, [redacted] and Operation Rescue National organized the "Going to the Gates" campaign in which they picketed outside high schools in cities across the nation with graphic anti-abortion posters.

In July 1996, [redacted] helped organize the "Summer of Mercy Remembrance Event" to mark the five-year anniversary of Operation Rescue's "Summer of Mercy."

In Summer 1996, [redacted] and [redacted] were among the principal organizers of two cross-country Operation Rescue "Show the Truth Tour" anti-abortion campaigns, which included several clinic blockade attempts at the Republican National Convention [redacted]. This involvement with Operation Rescue contradicts [redacted] claim that, because of his work with [redacted], who signed an early version of the Defensive Action Statement, [redacted] was no longer a part of Operation Rescue.

On April 10, 1995, [redacted] attended a preview of Randall Terry's Christian Leadership Institute in [redacted], where Terry predicted Christians might be called to "take up the sword to overthrow the tyrannical regime that oppresses them."

In 1995, [redacted] was instrumental in the "conversion" of [redacted], the "Jane Roe" of Roe v. Wade. [redacted] baptized [redacted] in a swimming pool. After her "conversion," [redacted] initially shied away from public appearances, stating that she was going to be "regular person [redacted]." However, she was later arrested at a clinic blockade in [redacted], and has followed [redacted] and his allies on several national appearance tours.

In May 1994, [redacted], Operation Rescue National, Rescue America, and several other individual defendants were fined [redacted]. [redacted] was assessed no individual actual damages, but his organization, Operation Rescue National, was fined [redacted].

[redacted]

Vehicle Information: [redacted], license plate [redacted]

Statements/Press/Miscellaneous

"We are here to tell the Supreme Court that you are not supreme. There is another higher court." Associated Press, Arrest Could Stall Anti-abortion Efforts, Kansas Morning Sun Kansas, June 23, 2001 (quoting [redacted]).

[redacted] supposedly disavows violence and says of [redacted] saying that he committed "an act of cowardice, terror and murder." Steve Goldstein, Killer at Abortion Clinic Believes His Act was Right, Philadelphia Inquirer, May 6, 1999 (quoting [redacted]).

[redacted] said that Operation Rescue did not support the murder of [redacted] even though he "murdered countless thousands of innocent children . . . . He has been a killer for a long time . . . [but] I am sad to learn of his death." Murder of New York Abortion Doctor Denounced as Terrorism, CNN, Oct. 24, 1998, http://edition.cnn.com/US/9810/24/doctor.killed.02/ (quoting [redacted]).

About [redacted], [redacted] says, "He's no [redacted] any group. He's a [redacted] kind of guy . . . dangerous . . . loose cannon . . . enemy of the cross . . . . What can you do when the media allows a guy to spew heresy? . . . [redacted] needs to shut his mouth.... If there was any way I could get a hold of [redacted] and wring his neck, I would do it." Laura LaFey, Radical Abortionists Must Be Stopped, Norfolk Virginian-Pilot, Aug. 19, 1994, at A1.

'[redacted] is no longer a spokesman for Operation Rescue. There are too many unanswered questions . . . I absolutely have a big problem with the fact that he is dealing with someone like [redacted]." [redacted], [redacted] Wants to Revitalize the State Chapter of Operation Rescue, but the Issue of Violence Might Impede His Efforts, L.A. Times, Oct. 24, 1994 (quoting [redacted]).

Speaking of state laws, [redacted] said, "If those laws violate the rights of children, then I think those laws are bad laws. They are under no natural law." [redacted], Doctor, Wife Seek Restraining Order on Abortion Foes Targeting Them, Dallas Morning News, Feb. 11, 1993 (quoting [redacted]).

"I am a missionary to the pre-born." [redacted], Abortion Foe [redacted] Sues GOP Officials over Denial of a Spot on Judicial Ballot, Dallas Morning News, Feb. 9, 1994 (quoting [redacted]).

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

Facebook: [redacted]

Twitter: [redacted]
Instagram: [redacted]
LinkedIn: [redacted]
YouTube: [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted]

[redacted] is closely associated with [redacted], Chet and [redacted] Gallagher, [redacted] and [redacted], and the Zastrow family.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] drives a "truth truck" around the country to various reproductive health care facilities and OSA events.

[redacted] attended the national OSA events in 2018 in [redacted]; 2017 in [redacted]; 2016 in [redacted] 2015 in [redacted]; 2014 in [redacted]; and 2013 in [redacted].

In 2016, he was spotted in [redacted] protesting the residence of [redacted] and the church of [redacted] (both providers at [redacted]).

Statements/Press/Miscellaneous







[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:**[redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities. They have at least [redacted] child together.

[redacted] is closely associated with [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

The.Ekklesia.of [redacted] - [redacted]

The Gathering – [redacted]

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] frequently protests outside of the [redacted] facility. He also participates in training anti-choice individuals to protest abortion and recruit others.

November 2, 2019: [redacted] attended the anti-choice "Repent With Us" conference in [redacted] that was cohosted by the Ekklesia of [redacted] and Operation Save America.

January 25 – 26, 2019: [redacted] attended the Ekklesia of [redacted] first statewide gathering.

November 2017: [redacted] the Ekklesia of [redacted], an anti-choice organization, with [redacted].

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted] who is also engaged in anti-choice activities.

[redacted] is closely associated with [redacted], Jason Storms, [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

Free The States

Sermon in the Park!– [redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] has previously participated in Free the States events and meetings as a featured speaker.

[redacted] founded and is a pastor with Sermon in the Park. Every Sunday, [redacted] preaches to a group of homeless in the local area.

November 16, 2019: [redacted] spoke at the "Life Eternal, Life Now" anti-choice conference at Encounter Life Church in [redacted].

September 2019: [redacted] spoke at the Church Arise conference in [redacted].

June 2019: [redacted] published an anti-choice book, [redacted], discussing the Christian scripture and how it relates to abortion. The book has been endorsed by Free the States and its supporters.

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs: [redacted]
DOB:. [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email:. [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. They have [redacted] children together. The whole family has been active in anti-choice protests.

[redacted] is closely associated with [redacted], [redacted], [redacted], the "[redacted]," Jason Storms, [redacted], and Cal Zastrow.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

July 2019: [redacted] participated in and helped lead the annual Operation Save America national event in [redacted].

[redacted] participated in abortion clinics protests in [redacted] during the summer of 2010.

[redacted] is believed to work at [redacted] in [redacted].

[redacted] is a [redacted] at [redacted]. He graduated from [redacted] ([redacted]) in [redacted] with.a.degree.in [redacted]

Statements/Press/Miscellaneous

[redacted]

[redacted] is known to drive a [redacted] with license plate [redacted] and a "Choose Life" [redacted].



[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email:. [redacted]

Social Media:

- **Facebook:**. [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:**. [redacted]

Description/Physical Appearance

[redacted].

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities. They have at least [redacted] child. [redacted] is the [redacted] Operation Save America – [redacted].

[redacted] is closely associated with Chet and [redacted] Gallagher.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] is known to participate in the annual Operation Save America national events. Most recently [redacted] attended the 2019 even in [redacted].

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities. They have at least [redacted] child together.

[redacted] is closely associated with Bevelyn Beatty, [redacted], [redacted], [redacted] and [redacted].

Major Known Areas of Travel

Nationwide

Affiliated Groups

Operation Save America – [redacted] chapter

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] has attended numerous Operation Save America (OSA) national events nationwide. Most recently, [redacted] participated in the 2019 event in [redacted].

January 2019:. [redacted] attended OSA's Leadership Meeting

[redacted] frequently protested outside of [redacted] before it was shut down in 2015. [redacted] continues to protest at other reproductive health care facilities in [redacted].

[redacted] wrote a book in 2012, [redacted], about her cat's struggle with feline leukemia.

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. They have at least [redacted] children.

[redacted] is associated with [redacted], and [redacted].

Major Known Areas of Travel

Nationwide

Affiliated Groups

Abolish Human Abortion – [redacted] (2013 – Present)

Abolitionist Society of [redacted] – [redacted]

Center for Bio-Ethical Reform – [redacted] (2011 – 2013)

Free the States

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] is an ultrasound technician. She has previously testified before state legislatures to lobby for anti-choice bills, including ultrasound and waiting period requirements and "heart beat" bans.

November 5 – 8, 2019: [redacted] attended the "Defenders of Life – [redacted] Freedom Rally"

2019: [redacted] is featured in Apologia Studios' "Babies are Still Murdered Here" film.

2013: [redacted] attended the March for Life in [redacted].

July 7, 2012: [redacted] was a speaker at [redacted] Right to Life event outside of [redacted].

February 16, 2010: [redacted] attended the Abolitionist Conference.

Statements/Press/Miscellaneous

"We need more men willing to take risks for the sake of others, for the risk of not doing so is so much greater." - Comment on [redacted] detention at the [redacted] pride parade in 2019.

[redacted]







AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. [redacted]

Major Known Areas of Travel

Nationwide

Affiliated Groups

Army of God

Minutemen United – [redacted]

Operation Save America – [redacted]

Pass the Salt Ministries – [redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] hosts an anti-choice podcast and an "Interactive Live Huddle" through his website. He calls for people to join his "[redacted]" to challenge the "church of the status quo."

[redacted] participated in the 2010 OSA National Event in [redacted]. He helped organize the 2004 OSA National Event in [redacted]. He has also traveled to [redacted] to participate in OSA events.

Statements/Press/Miscellaneous

[redacted] Lived Bio

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. He is also engaged in anti-choice activities.

[redacted] is closely associated with Joan Andrews Bell, Coleman Boyd, [redacted], Eva Edl, Jonathan Darnel, [redacted], Dennis Green, Lauren Handy, Heather Idoni, [redacted], Justin Phillips, Cal Zastrow, and Eva Zastrow.

Major Known Areas of Travel

[redacted]

Affiliated Groups

ONElife for Life

Red Rose Rescue

Arrests and Law Enforcement Contact

March 5, 2021: [redacted] participating in a blockade at [redacted] in Mt. Juliet, TN with Eva Edl, [redacted], Dennis Green, [redacted] (minor), Heather Idoni, Eva Zastrow, James Zastrow, Cal Zastrow, and three other minors.

August 27, 2020: [redacted] participating in a blockade at [redacted] in Sterling Heights, MI with [redacted], Joel Curry, [redacted], Eva Edl, [redacted], Heather Idoni, Justin Phillips, Cal Zastrow, and Eva Zastrow.

May 13, 2020: [redacted] an attempted Red Rose Rescue invasion at [redacted] in [redacted].

Activities and Other Info

[redacted] frequently protests outside of reproductive health care facilities in and around [redacted], with [redacted].

[redacted] participates in blockades and "rescues" with a group of anti-abortion activists including the families of Coleman Boyd, Dennis Green, and Cal Zastrow.

March 2021: [redacted] traveled to [redacted] to protest outside of [redacted] with Coleman Boyd, [redacted], and Cal Zastrow.

October 22, 2020: [redacted] traveled to [redacted] to participate in a Red Rose Rescue "lock and block" at [redacted] but was not arrested.

January 24, 2020: [redacted] attended the 2020 March for Life in Washington, DC.

January 18, 2019: [redacted] attended the 2019 March for Life in Washington, DC.

Statements/Press/Miscellaneous

[redacted]

[redacted]






AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted] (née [redacted]). They have at least [redacted] children, including [redacted], and [redacted] (adopted [redacted]). The whole [redacted] family is engaged in anti-choice activities.

[redacted] is closely associate with [redacted]

[redacted], [redacted], [redacted], [

September 18, 2018: [redacted] I Almost Died But Found Jesus – [redacted]

Eva Edl



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email:. [redacted]

Social Media:
Facebook:. [redacted]
Twitter: [redacted]
Instagram: [redacted]
LinkedIn:. [redacted]
YouTube: [redacted]

Description/Physical Appearance

[redacted].

Spouse/Family/Close Associates

Edl is also closely associated with [redacted], and the Zastrow family.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Abolish Human Abortion

Operation Save America

Arrests and Law Enforcement Contact

[redacted].

April 16, 2021: Edl was arrested while participating in a blockade at [redacted] in Saginaw, MI, with Heather Idoni.

March 5, 2021: Edl was arrested for trespassing while participating in a blockade at [redacted] in Mt. Juliet, TN, with [redacted], [redacted], Dennis Green, [redacted] (minor), Heather Idoni, Eva Zastrow, James Zastrow, Cal Zastrow, and three other minors.

[redacted]

August 27, 2020: Edl was arrested for trespassing while participating in a blockade at [redacted] in Sterling Heights, MI, with [redacted], Joel Curry, [redacted], [redacted], Heather Idoni, Justin Phillips, Cal Zastrow, and Eva Zastrow.

[redacted]

Activities and Other Info

July 2019: Edl participated in and spoke at the annual Operation Save America national event in [redacted].

Edl is mentioned in [redacted] ([redacted]) book Not on My Watch.

Edl was sent to a concentration camp in Yugoslavia in 1944, before escaping to Austria.

Statements/Press/Miscellaneous

Concentration camp survivor urges Americans to defend the preborn: 'Stand up for the innocent'

Chet Gallagher





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

Chet is married to [redacted], who is also engaged in anti-choice activities. [redacted]

Major Known Areas of Travel

Nationwide

Affiliated Groups

Abolish Human Abortion

Lambs of Christ

Operation Rescue

Operation Save America – [redacted]

Arrests and Law Enforcement Contact

[redacted]

March 5, 2021: Gallagher was arrested for trespassing while participating in a blockade at [redacted] in Mt. Juliet, TN, with [redacted], Eva Edl, Dennis Green, [redacted] (minor), Heather Idoni, Eva Zastrow, James Zastrow, Cal Zastrow, and three other minors.

[redacted]

August 27, 2020: Gallagher was arrested for trespassing while participating in a blockade at [redacted] in Sterling Heights, MI, with [redacted], Joel Curry, [redacted], Eva Edl, Heather Idoni, Justin Phillips, Cal Zastrow, and Eva Zastrow.

[redacted]

[redacted]

Activities and Other Info

[redacted]

July 2019: Gallagher participated in the annual Operation Save America national event in [redacted].

July 2016: Gallagher participated in the annual Operation Save America national event in [redacted].

Gallagher participated in national anti-abortion protests outside schools across the country on November 24, 2009[redacted].

He was in [redacted] for Operation Save America's "Summer of Mercy Renewal" in 2001.

In the summer 1993, he was the [redacted] the Operation Rescue "Cities of Refuge" campaign in [redacted].

He is listed as an evangelist with his wife, [redacted], on the [redacted] website.

Gallagher joined the Lambs of Christ [redacted].

[redacted]

[redacted]

Statements/Press/Miscellaneous

[redacted]

"Jesus Christ has not called me to murder the abortionists. Jesus has called me to block the doors so no one is killed." [redacted] Abortion Foes in Boot Camp Mull Doctor's Killing, N.Y. Times, Mar. 19, 1993 (quoting Chet Gallagher).

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

Facebook: [redacted]

Twitter: [redacted]

Instagram: [redacted]
LinkedIn: [redacted]
YouTube: [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted] They have at least [redacted] children, [redacted] and [redacted] [redacted] wife cohosts [redacted] Podcast with him, and they frequently discuss their anti-abortion views and activities.

Major Known Areas of Travel

[redacted]

Affiliated Groups

Apologia Studios

Franklin Classical School [redacted]

King's Meadow Study Center [redacted]

New College Franklin [redacted]

Operation Rescue

U.S. Taxpayers Party of Tennessee [redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

April 16, 2021: [redacted] acted as a preacher for a Gideons International Convention.

April 10, 2021: [redacted] spoke at God and Government online conference hosted by Cruciform Ministries.

August 2020: [redacted] was a featured speaker at the 2020 For God and Truth Conference, titled "A Biblical Response to Crisis".

2018: [redacted] was a guest on [redacted] Apologia Radio podcast to speak about the history of Planned Parenthood.

1998: [redacted] acted as a witness for defendant Operation Rescue in N.O.W v. Scheidler

1994: [redacted] spoke at an annual conference of the BC Pro-Life Society

1991: [redacted] spoke at an annual conference of the BC Pro-Life Society

Statements/Press/Miscellaneous

[redacted] is the author of a number of pro-life books, including: [redacted]

[redacted]. He has also written many books on Christian family values, "biblical" alternatives to

state welfare, other conservative topics. He has also written several other anti-abortion materials and created books and video curricula for classical Christian education. He and his wife [redacted] host a Christian podcast called [redacted] Podcast and frequently discusses pro-life topics. He also hosts a podcast called [redacted].

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities. They have at least [redacted] children, [redacted], [redacted], [redacted], [redacted] and [redacted].

[redacted] is closely associated with [redacted], [redacted], [redacted], [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

Living Hope Ministry [redacted]

Operation Save America [redacted]

Parents as First Educators [redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

September 19-22, 2019: [redacted] was a speaker at the Church Arise conference in[redacted].

May 3-5, 2019: [redacted] was a speaker at the [redacted] Evangelism Conference (SOEC) in [redacted].

[redacted] may drive a [redacted] with [redacted] license plates: [redacted]

Statements/Press/Miscellaneous

March 18, 2019: "The Church at Planned Parenthood" ([redacted]) – Saved Magazine YouTube video

[redacted]

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:
- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is associated with [redacted], [redacted], [redacted], [redacted], [redacted] and [redacted], [redacted] and [redacted], [redacted], Jason Storms, [redacted], [redacted] and [redacted], [redacted], [redacted], [redacted] and [redacted], and [redacted].

Major Known Areas of Travel

Nationwide

Affiliated Groups

Abolish Human Abortion

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] is extremely engaged in anti-choice activities. In addition to protesting outside of reproductive health care facilities, he also protests outside of churches, schools, and major public areas. Additionally, [redacted] is known to drive a "truth truck," cross-country, making stops at schools and reproductive health care facilities. [redacted]

June 22, 2019: [redacted] was detained with [redacted] and [redacted] for trespassing at the [redacted] pride parade.

On February 15, 2012 [redacted] protested outside the [redacted], with a sign that stated "Where's Your Church?"

[redacted] reportedly traveled to [redacted] with [redacted] to protest at [redacted] clinic in August 2009 after [redacted]. He has also protested at [redacted]. [redacted]

[redacted] license plate: [redacted]

Statements/Press/Miscellaneous

[redacted] "truth truck":







[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:
- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is closely associated with [redacted] and [redacted].

Major Known Areas of Travel

Nationwide

Affiliated Groups

Operation Save America – [redacted]

Spirit One - [redacted]

States of Refuge – [redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] travels nationally for Operation Save America events.

[redacted]

July 2012: [redacted] attended the annual Operation Save America national event in [redacted].

July 2011: [redacted] attended the annual Operation Save America national event in [redacted]

July 2010: [redacted] attended the annual Operation Save America national event in [redacted].

[redacted]

Statements/Press/Miscellaneous

[redacted]

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities.

[redacted] is closely associated with [redacted], [redacted], and [redacted].

[redacted] previously voiced criticisms of [redacted], but in recent years he has teamed up with Operation Save America to target clinics.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Army of God

Missionaries to the Preborn[redacted]

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

[redacted]

Activities and Other Info

[redacted]

[redacted] is a "Moderator" for the Missionaries to the Preborn Facebook page.

2014: [redacted] traveled to [redacted] to attend [redacted] court hearing for [redacted]

[redacted]

2001: [redacted] attended the White Rose Banquet and gave an introduction for [redacted]

[redacted]

Driver's License Numbers:

[redacted]: [redacted]

[redacted]: [redacted]

Statements/Press/Miscellaneous

[redacted]

[redacted]

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted].

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Abolish Human Abortion (AHA)

Army of God

Missionaries to the Preborn

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted]

Statements/Press/Miscellaneous

[redacted]

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email:. [redacted]

Social Media:

Facebook: [redacted]

Twitter: [redacted]
Instagram: [redacted]
LinkedIn: [redacted]
YouTube: [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted] (née [redacted]). They have at least [redacted] children together. The whole family travels together for anti-choice protests and events with AHA.

[redacted] is associated with [redacted], Jason Storms, [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

Abolish Human Abortion – [redacted]

Abolitionist Society of [redacted]

Apologia Studios

The Ekklesia of [redacted]

Free the States – [redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] creates and distributes pamphlets and fliers for Abolish Human Abortion (AHA). He assists in organizing AHA events, protests, and rallies.

[redacted] after becoming convinced that God chose him to be an abortion "abolitionist."

He draws a sharp distinction between "pro-life leaders" and "abolitionists," mainly that the pro-lifers make too many compromises on abortion, like in the case of rape or incest.

November 16, 2019: [redacted] and his family participated in the Abolish Abortion [redacted] Conference in [redacted].

Statements/Press/Miscellaneous

[redacted]

March 8, 2014: Meet the rebels of the anti-abortion movement – MSNBC

Heather Idoni

AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:
- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

Heather is married to [redacted]. They have at least [redacted] children together, [redacted]

Idoni is closely associated with [redacted], Dennis Green, Joel Curry, Cal Zastrow, Eva Zastrow, and Eva Edl.

Major Known Areas of Travel

[redacted]

Affiliated Groups

Red Rose Rescue

ONElife for Life

Citizens for a Pro Life Society

Abolitionist Society of Central [redacted]

Arrests and Law Enforcement Contact

April 16, 2021: Idoni was arrested during a blockade at [redacted] in Saginaw, MI, with Eva Edl.

March 5, 2021: Idoni was arrested during a blockade at [redacted] in Mt. Juliet, TN, with [redacted], Dennis Green, [redacted] (minor), Eva Zastrow, James Zastrow, Cal Zastrow, Eva Edl, and three other minors.

[redacted]

August 27, 2020: Idoni was arrested in a blockade at [redacted] in Sterling Heights, MI, with [redacted], Joel Curry, [redacted], Justin Phillips, Cal Zastrow, Eva Zastrow and Eva Edl.

[redacted]

April 24, 2020: Idoni attended the national Red Rose Rescue conference in [redacted].

Activities and Other Info

Idoni frequently protests outside of reproductive health care facilities in [redacted].

June 4-5, 2021: Idoni travelled and protested during a Red Rose Rescue for an invasion at the [redacted] in [redacted].

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

Facebook: [redacted]
[redacted]
Twitter: [redacted]
Instagram: [redacted]
LinkedIn: [redacted]
YouTube: [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is separated from [redacted]. They have at least [redacted] children. The entire family is engaged in anti-choice activities. [redacted] is the [redacted] of the Association of Pro-life Physicians and the [redacted] Personhood [redacted]. [redacted]

[redacted] is associated with [redacted], [redacted] and [redacted], [redacted], [redacted], [redacted], and [redacted].

Major Known Areas of Travel

Nationwide

Affiliated Groups

[redacted] Personhood

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

July 2019: [redacted] and her family participated in the annual Operation Save America national event in [redacted].

February, 2019: [redacted] published a book, [redacted] about religious liberty being under attack.

[redacted] was a featured speaker at the 2018 OSA National Event in [redacted].

[redacted] and her husband organize protests at the annual conference of the American College of Obstetricians and Gynecologists. Previous attendees include [redacted] and [redacted].

[redacted], his wife, [redacted], and their children participated in OR/OSA's national events in [redacted].

The [redacted] became involved in anti-abortion activities when they were in college at [redacted] in the [redacted]. [redacted] took part in formal campus debates on abortion while [redacted] was the [redacted] of the campus' anti-abortion organization.

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs: [redacted]
DOB:. [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
[redacted]
Phone Number: [redacted]
Website: [redacted]
Email:. [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. [redacted] has at least [redacted] children. At least [redacted] of their children, [redacted], is also engaged in anti-choice activities. [redacted].

She is closely associated with [redacted], [redacted], [redacted], and [redacted]

Major Known Areas of Travel

[redacted]

Affiliated Groups

Army of God

American Coalition of Life Activists (ACLA)

Red Rose Rescue

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] She frequently brings one or more of her children when she demonstrates at clinics.

She continues to protest regularly at the [redacted] in [redacted]

January 24, 2019: [redacted] attended the national March for Life in Washington, DC. She claims she was there as part of a documentary on abortion.

September 5, 2019: [redacted] and her daughter [redacted] entered a reproductive health care facility in [redacted] posing as a patient and her mother. On the same morning, Joan Andrews Bell, [redacted], Jonathan Darnel, and Lauren Handy entered another reproductive health care facility in [redacted] and carried out a "Window of Opportunity Rescue." This type of invasion

involves anti-choice individuals entering a facility, speaking with patients, and leaving the property before police arrive.

In 2014, [redacted] entered a reproductive health facility in [redacted] posing as a patient.

[redacted]

[redacted] was honored at the [redacted] Rose Banquet in 1998, a gathering for anti-abortion extremists organized by [redacted] and Army of God.

[redacted] joined [redacted], [redacted], and others to picket in support of [redacted] while he was jailed in [redacted].

[redacted] attended the White Rose Banquet in the [redacted] in January 1996.

[redacted]

Statements/Press/Miscellaneous

[redacted]

[redacted]



AKAs: [redacted]
DOB:. [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email:. [redacted]

Social Media:

- **Facebook:**. [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. They have [redacted] children: [redacted], [redacted], [redacted], and [redacted]. They have several grandchildren. [redacted] wife is vocal in her support for her husband and acts as president of [redacted] Christian legal organization [redacted]. At least [redacted] of [redacted] children have also been

employed by the [redacted] While some of [redacted] children remain out of the spotlight, his son [redacted]

[redacted] is affiliated with [redacted], [redacted], Jason Storms, [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

American Family Association

[redacted] – [redacted]

Operation Save America

Personhood USA

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted]

[redacted]

Statements/Press/Miscellaneous

"You know, some told me 'you know they're a radical group.' I said yeah. They are radical for God." – [redacted] defending his affiliation with Operation Save America.

[redacted]

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **Reddit:** [redacted]
- **Pinterest:** [redacted]
- **Tumblr:** [redacted]
- **Kik:** Usperson
- **Ask.fm:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] mother, [redacted], also participate in anti-choice activities.

[redacted] is closely associated with [redacted], [redacted], [redacted], [redacted], Jason Storms, [redacted] family, [redacted], [redacted], [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

Abolish Abortion [redacted]
Operation Save America
Operation Save [redacted] – [redacted] (September 2018 - Present)

Arrests

[redacted]

[redacted]

Activities and Other Info

[redacted] is known to protest at various reproductive health facilities in [redacted] including [redacted]. Additionally, he travels for Church Arise conferences and Operation Save America events.

[redacted] participates in Project Frontlines, protesting abortion outside of schools with graphic images, with [redacted].

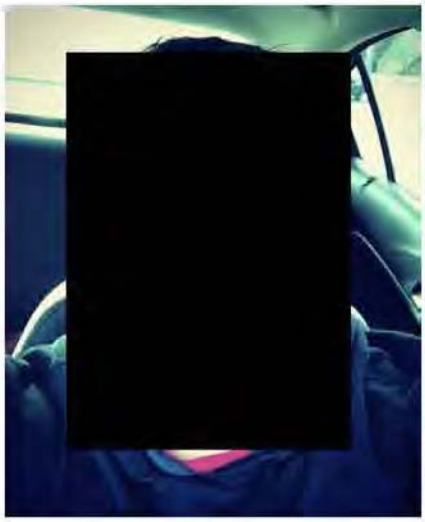
March 15, 2017: [redacted] and members of Abolish Abortion [redacted] delivered a letter to Governor Scott Walker [redacted]

Statements/Press/Miscellaneous

[redacted]

December 8, 2018: Operation Save [redacted] Facebook live [redacted] outside FPA in [redacted]

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities. They have at least [redacted] children together, [redacted], [redacted], and [redacted].

[redacted] is closely associated with [redacted], [redacted], [redacted], [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

The.Ekklesia.of [redacted] - [redacted]

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] frequently protests outside of the [redacted] facility. He also participates in training anti-choice individuals to protest abortion and recruit others.

November 2, 2019: [redacted] attended the anti-choice "Repent With Us" conference in [redacted] that was cohosted by the Ekklesia of [redacted] and Operation Save America.

January 25 – 26, 2019: [redacted] attended the Ekklesia of [redacted] first statewide gathering.

November 2017: [redacted] founded the Ekklesia of [redacted], an anti-choice organization, with [redacted].

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email:. [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:**. [redacted]
- **YouTube:**. [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities. [redacted] frequently participates in OSA activities with him and has made threatening statements against local providers in [redacted]. They have at least [redacted] son, [redacted] and [redacted] daughter, [redacted],

Major Known Areas of Travel

[redacted]

Affiliated Groups

Operation Save America - [redacted]

[redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] leads weekly OSA protests at a [redacted] in [redacted]. [redacted] has traveled to NYC and elsewhere to protest with [redacted] and OSA.

July 2019: [redacted] participated in and helped to lead the annual Operation Save America national event in [redacted].

January 24, 2019: [redacted] protested outside of [redacted] in [redacted] with dozens of other anti-choice individuals, including [redacted], Jason Storms, and [redacted].

He participated in the OR/OSA Leadership Meeting in [redacted] in February 2010, and he helped lead the July 2010 OR/OSA National Event in [redacted].

October 2009: [redacted] protests outside of a reproductive health care facility in [redacted].

Statements/Press/Miscellaneous

May 20, 2019: Extremists Are Winning the War on Abortion –Vice News

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]
- **IMDB:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted] (née [redacted]), who is also engaged in anti-choice activities.

[redacted] is closely associated with [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

Apologia Studios – [redacted]

End Abortion Now

Cross Politic Studios – [redacted]

[redacted] – [redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted]

June 2018: [redacted] attended the Biblical Worldview Student conference as a speaker.

2017 – 2018: [redacted] was the Executive producer of."[redacted]".which he created with [redacted].

May 4 – 6, 2017: [redacted] [redacted] in Apologia Studios' "End Abortion Now – National Leadership Conference" in [redacted].

2014: [redacted] [redacted] the Apologia Studios anti-choice film, "Babies Are Murdered Here"

2004 – 2006: [redacted] attended [redacted] in [redacted].

Statements/Press/Miscellaneous

[redacted]

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted], who also participates in Abolish Human Abortion events. They have at least [redacted] children together.

[redacted] is closely associated with [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

Abolitionist Society of Fort Worth[redacted]

Abolish Human Abortion

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] attends many Abolish Human Abortion protests and events. He sometimes participates in "Project Frontlines," which involves protesting abortion outside of local middle and high schools.

Statements/Press/Miscellaneous

[redacted]

Portrait of an Anti-Abortion 'Abolitionist'

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:
- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. They have [redacted] children. [redacted] wife has been active with Personhood [redacted] efforts and other anti-abortion activity. [redacted] children also participated in anti-abortion activity when they were younger.

[redacted] is associated with Dennis Green, Jason Storms, and Cal Zastrow.

Major Known Areas of Travel

[redacted]

Affiliated Groups

Morning Center Ministries

Operation Save America

Personhood Alliance – [redacted]

Personhood [redacted] – [redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

According to the Personhood Alliance, [redacted] has been involved in anti-abortion work since 1991, ranging from sidewalk counseling to advocacy.

August 2020: [redacted] became [redacted] of Personhood Alliance.

2011: [redacted] helped write and campaign for [redacted], which would have defined life and personhood as beginning at fertilization in the [redacted] state constitution. The amendment did not pass, but [redacted] continued his work with Personhood[redacted] and Personhood Alliance.

Statements/Press/Miscellaneous

September 2011: "We think that God has already told us when life begins, and science has confirmed it, and the court has just not dealt with it. We hope the [redacted] voters will force them to take another look at that decision." – [redacted], in an interview with HuffPost about the [redacted] Personhood movement.

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

Facebook: [redacted]
Twitter: [redacted]
Instagram: [redacted]
LinkedIn: [redacted]
YouTube: [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities. They have [redacted] children together, [redacted], [redacted], [redacted], and [redacted]. The kids also appear to be engaged in anti-

choice events. There are photos of them singing at "abortion-free" events, sitting on the OSA camper, and praying outside of reproductive health facilities.

The [redacted] family is associated with the [redacted], [redacted], [redacted] and [redacted] families.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] is known to travel to participate in Operation Save America protests and events.

[redacted] and his wife, [redacted] are regular protests at [redacted] reproductive health care facilities.

Statements/Press/Miscellaneous

[redacted]

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
[redacted]
Website: [redacted]
Email:. [redacted]

Social Media:
Facebook: [redacted]
[redacted] – [redacted]
Twitter: [redacted]
Instagram: [redacted]
LinkedIn: [redacted]
YouTube: [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted], who is also engaged in anti-choice activities. They have [redacted] children together, [redacted], [redacted] [redacted], and [redacted]. The kids also appear to be engaged in anti-

choice events. There are photos of them singing at "abortion-free" events, sitting on the OSA camper, and praying outside of reproductive health facilities.

The [redacted] family is associated with the [redacted], [redacted], [redacted] and [redacted] families.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] is known to travel to participate in Operation Save America protests and events.

[redacted] and her husband, [redacted], are regular protests at [redacted] reproductive health care facilities.

Statements/Press/Miscellaneous

[redacted]

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. The have [redacted] daughters. [redacted]

[redacted] is closely associated with [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

Missionaries to the Preborn

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

July 2019: [redacted] participated in the annual Operation Save America national event in [redacted].

As of 2015, a [redacted] was registered to [redacted] with [redacted] license plates: [redacted]

1990: [redacted] moved to. [redacted] to join Missionaries to the Preborn

Statements/Press/Miscellaneous

[redacted]

Derin Stidd



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

Stidd is married to [redacted]. The have [redacted] kids: [redacted], [redacted], and [redacted] younger children. Both [redacted] and [redacted] participate in anti-abortion activity. [redacted] frequently accompanies his father to anti-abortion events, has participated in events for Abolish Abortion [redacted], and uses Facebook as a platform to encourage other kids to participate as well. [redacted] is not as actively involved in anti-abortion preaching or protest but is vocally anti-abortion and has volunteered with Operation Save America. Stidd and his wife frequently bring their younger children to protest outside of abortion clinics with them.

Stidd is associated with [redacted], [redacted], [redacted], Jason Storms, [redacted], [redacted], [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

Cruciform Ministries

Free the States

[redacted] Church – Paster

Operation Save America – Assistant National Director as of June 2021

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

Stidd has been involved with Operation Save America since at least 2017 and was tapped to serve as Assistant National Director under Jason Storms when [redacted] stepped down in 2021. He consistently attends national and regional events with OSA, as well as leadership conferences, and occasionally drives an OSA trailer decorated with anti-abortion messages. Stidd also serves as a pastor in [redacted]

April 2021: Stidd and his family took a road trip to conduct anti-abortion outreach [redacted]

April 10, 2021: Stidd spoke at a conference titled "God and Government" hosted by Cruciform Ministries. Several other anti-abortion leaders spoke, including [redacted] and [redacted].

October 22, 2020: Stidd spoke at a conference titled "Holiness and the Sanctity of Human Life" hosted by Cruciform Ministries.

July 24, 2020: Stidd spoke at the 2020 Operation Save America National Event in [redacted].

February 10, 2020: Stidd gave a talk titled "What Can Southern Baptists do to Abolish Abortion?" at an event with Free the States and [redacted] Baptists for Abolishing Abortion.

July 2019: Stidd participated in Operation Save America's 2019 National event in [redacted].

April 5, 2019: Stidd and other local anti-abortion leaders hosted the Abolish Abortion [redacted] Conference. Jason Storms and [redacted] spoke at the conference.

January 22-23, 2019: Stidd and his family traveled to [redacted] for the 16th anniversary of Roe v. Wade. They joined OSA members and other anti-abortion leaders at a rally outside of the [redacted] State House and participated in protests outside of a local clinic.

July 2018: Stidd participated in a Justice March with Operation Save America in [redacted].

Statements/Press/Miscellaneous

[redacted]

Jason [redacted] Storms



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

Jason is married to [redacted] (née [redacted]), the daughter of [redacted], who is also engaged in anti-choice activities. They have at least [redacted] children together. Their oldest daughter, [redacted], also participates in anti-choice activities and mission trips.

Storms is closely associated with [redacted], the [redacted] family, [redacted], and Cal Zastrow.

Major Known Areas of Travel

[redacted]

Affiliated Groups

[redacted] Church.– [redacted]

Missionaries to the Preborn

Operation Save America – National Director (anticipated June 2021 – Present), Former Assistant Director, Former Director of Campus Outreach

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

Storms holds anti-choice protests at [redacted] reproductive health care facilities, schools, and public areas such as parks and highway overpasses.

June 2021: Storms will officially succeed [redacted] as the National Director of OSA during the OSA national event in [redacted].

July 2019: Storms attended and helped lead Operation Save America's annual anti-choice "Summer of Mercy" event in [redacted].

Storms and his wife [redacted], along with the help of [redacted], created the Faithful Soldier School of Evangelism, which is dedicated to Biblical discipleship, academic training, and evangelism and outreach.

Storms worked as a substitute teacher in the [redacted] Public School system in 2018, where he admittedly spent hours preaching to students and "making disciples."

[redacted]

[redacted], license plate: [redacted]

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
[redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:
- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. They have [redacted] children. [redacted] and many of their children are also engaged in anti-choice activities.

He also associates with [redacted] and [redacted] of Abolish Human Abortion.

Major Known Areas of Travel

Nationwide

Affiliated Groups

Christ in Action – [redacted]

Elijah Ministries – [redacted]

March for Jesus

Missionaries to the Unborn

Operation Rescue

Operation Save America - [redacted]

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] plans to step down from OSA leadership at the end of the June 2021 summer national event in [redacted].

[redacted] is a regular protester at the [redacted] facility in [redacted].

[redacted] participates in most Operation Save America events, including the annual national summer event, "Summer of Mercy," and other smaller regional protests and conferences.

[redacted] participated in clinic protests and pickets of providers' homes (including the distribution of "wanted" posters) with Operation Rescue in [redacted], in July 1995.

[redacted] appears frequently with [redacted] and appeared to be a major participant and organizer during the Operation Rescue activities at the Republican National Convention [redacted], in August 1996.

[redacted] was in [redacted], for Operation Save America's "Summer of Mercy Renewal" in 2001. He seems to have a leadership role in Operation Save America protests around the country.

Statements/Press/Miscellaneous

[redacted]

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. The [redacted] have [redacted] children, [redacted] the entire family is engaged in anti-choice activities.

[redacted] daughter [redacted] is married to [redacted], [redacted].

Major Known Areas of Travel

Nationwide – with a focus on the [redacted]

Affiliated Groups

Free the States

Gun Owners of America

Lesser Magistrates

Missionaries to the Preborn [redacted]

[redacted] Church – Pastor

Oklahomans United for Life

Tell The Truth Ministries

U.S. Taxpayers Party

Youth for America, Defensive Action

Arrests and Law Enforcement Contact

[redacted]

[redacted]

Activities and Other Info

[redacted] of Missionaries to the Preborn, he and his followers have mounted a relentless campaign against abortion providers in [redacted] for years. In addition, they conduct several "show the truth" tours each year in cities across the [redacted].

[redacted] often organizes his followers and members of Missionaries to the Preborn to canvass and protest personal residences and neighborhoods of physicians of abortion clinics.

[redacted]

January 9-11, 2020: [redacted] attended the Church Arise Alaska conference in [redacted].

November 5 – 8, 2019: [redacted] attended the "Defenders of life – [redacted] Freedom Rally" in [redacted].

July 2019: Participated in and helped lead Operation Save America's annual national event in [redacted].

April 2019: [redacted] attended an anti-choice abolitionist conference in [redacted] with [redacted], [redacted], and [redacted].

2013: [redacted] published "[redacted]" that advocates for the defiance of local/state/federal laws that are deemed "unjust" by religious teachings.

In May 1994, [redacted] (along with Operation Rescue [redacted] Randall Terry) addressed the [redacted] state U.S. Taxpayers' Party convention.

In September 1995, [redacted] was sighted in [redacted] with Operation Rescue leader [redacted], recruiting for the U.S. Taxpayers Party and promoting militia causes.

[redacted] attended the 2001 White Rose Banquet [redacted].

[redacted]

[redacted] is a signatory of the Defensive Action Statement.

Drivers License:[redacted]

Statements/Press/Miscellaneous

[redacted] Trying To Convince Elected Officials That Women Who Have Abortions Should Be 'Tried For Homicide'

"It has long been established in law, not to mention Holy Scripture, that it is legitimate to use force in order to defend other persons from bodily harm. Therefore, this idea that the use of force or violence on behalf of the preborn is 'unthinkable' or 'wrong' is nonsense." [redacted], [redacted] *Executed*, Missionaries to the Preborn, http://www.missionariestopreborn.com/mtp_articles.html#paulhill

"Hate is good. God loves and God also hates." [redacted], [redacted] *Executed*, Missionaries to the Preborn, http://www.missionariestopreborn.com/mtp_articles.html#paulhill

"[The government] are low-life swine and they aim to disarm us. What should we do? We should do what thousands of people across this nation are doing. We should be forming militias. Churches can form militias today and teach their men how to fight." Email to the National Abortion Federation (citing Broadcast, Nation Public Radio, May 2, 1995) (on file with the National Abortion Federation).

"This Christmas I want you to do the most loving thing and I want you to buy each of your children an SKS rifle and 500 rounds of ammunition." Editorial, *Protest Poisoned by Fanaticism*, Milwaukee Sentinel, Aug. 19, 1994, at A14 (quoting [redacted]).

"We are living under socialism . . . the reason we should have guns is because we are Christians, and we have a biblical view of man. The reason we should have guns is because of our government." WVCY radio broadcast, Milwaukee, Wisconsin (Jan. 28, 1993) (quoting [redacted]).

November 2019 – [redacted] children, with spouses, and grandchildren:



[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

Facebook: [redacted]
Twitter: [redacted]
Instagram: [redacted]
LinkedIn: [redacted]
YouTube: [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is closely associated with [redacted], [redacted], and [redacted], [redacted].

Major Known Areas of Travel

Nationwide

Affiliated Groups

Abolish Human Abortion (AHA)

Operation Save America (OSA)

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] frequently protests outside of reproductive health care facilities, strip clubs, pride parades, and churches. He often brings large posters with images of products of conception to these protests and uses a megaphone.

September 2019: [redacted] attended the anti-choice Church Arise conference in [redacted].

July 2019: [redacted] attended the annual Operation Save America "Summer of Mercy" event in [redacted].

July 2018: [redacted] attended the annual Operation Save America "Summer of Mercy" event in [redacted].

2015: Graduated from [redacted] with a degree in [redacted].

Statements/Press/Miscellaneous

[redacted]

[redacted]



AKAs: [redacted]
DOB:. [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. They have [redacted] young children. [redacted] wife has also expressed anti-abortion views. [redacted] is the son of [redacted], who is also active in the anti-abortion movement.

[redacted] is associated with [redacted], Derin Stidd and [redacted].

Major Known Areas of Travel

[redacted]

[redacted]

Affiliated Groups

For God and Truth [redacted]

Operation Save America

YoungLiving Essential Oils

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] runs a blog where he regularly posts his thoughts on "faith, family, and business." He does not appear to participate in direct anti-abortion activism such as sidewalk counseling and has not explicitly discussed abortion on his blog. However, he expresses anti-abortion views openly on social media and has expressed his opposition to Roe v. Wade and other abortion protections.

August 2020: [redacted] spoke at the 2020 For God and Truth Conference, [redacted]

November 2019: [redacted] and other members of his local church climbed Mt. Kilimanjaro to raise money for an anti-human trafficking organization.

Statements/Press/Miscellaneous

[redacted]

[redacted]



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email:. [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

[redacted] is married to [redacted]. They have [redacted]. [redacted] participates in anti-abortion activities.

[redacted] is associated with [redacted], [redacted], Derin Stidd, [redacted], and [redacted].

Major Known Areas of Travel

[redacted]

Affiliated Groups

[redacted] Right to life

For God and Truth [redacted]

National Right to Life

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

Activities and Other Info

[redacted] does communications and development work at [redacted] Right to Life and has contributed to National Right to Life News.

October 4, 2019: [redacted] spoke at 10 Talents Conference, a Christian networking conference in [redacted].

[redacted]

Statements/Press/Miscellaneous

[redacted]

Calvin "Cal" Zastrow





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

Cal is married to [redacted]."[redacted]" Zastrow. They have [redacted] children:[redacted], [redacted], James, and Eva. The whole Zastrow family is engaged in anti-choice activities. [redacted]. Zastrow sometimes refers to his family as the "Zastrow Holiness Revival Team," "[redacted]."

Zastrow is closely associated with [redacted], [redacted], Coleman Boyd, [redacted], [redacted], [redacted], Eva Edl, [redacted], Dennis Green, [redacted], [redacted], [redacted], Heather Idoni, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], and [redacted].

Major Known Areas of Travel

Nationwide and International

Affiliated Groups

Constitution Party–[redacted] ([redacted])

Operation Rescue

Operation Save America (OSA)

Pastors' Emergency League

Personhood USA–[redacted]

Voice for Life Ministries

Arrests and Law Enforcement Contact

March 5, 2021: Zastrow was arrested for trespassing while participating in a blockade at [redacted] in Mt. Juliet, TN, with [redacted], Eva Edl, [redacted], Dennis Green, [redacted] [redacted] (minor), Heather Idoni, Eva Zastrow, James Zastrow, and three other minors.

[redacted]

August 27, 2020: Zastrow was arrested for trespassing while participating in a blockade at [redacted] in Sterling Heights, MI, with [redacted], Joel Curry, [redacted], [redacted], Eva Edl, [redacted], Heather Idoni, Justin Phillips, and Eva Zastrow.

[redacted]

[redacted]

Activities and Other Info

Zastrow frequently protests outside of reproductive health care facilities in and around Saginaw and [redacted], MI. Additionally, Zastrow is known to travel nationwide for anti-choice events and clinic blockades, and internationally for mission trips with his family.

July 2019: Zastrow participated in Operation Save America's annual anti-choice protests outside of [redacted] in [redacted].

[redacted]

Zastrow was in [redacted], for Operation Save America's annual "Summer of Mercy" anti-choice rally and has participated in several other national OSA events since then.

Zastrow relocated to [redacted] in 2011 to promote the passage of a Personhood Amendment to the state constitution. [redacted]

Statements/Press/Miscellaneous

Zastrow family:



First row (left to right): [redacted]

Second row (left to right): [redacted].

[redacted]





AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted].

Spouse/Family/Close Associates

[redacted] is married to [redacted] ([redacted]), who was engaged in anti-choice activities in [redacted] prior to meeting [redacted]. They have at least [redacted] child together [redacted].

[redacted] is the one of Cal and [redacted] Zastrow's [redacted] children. His [redacted] siblings are [redacted], Eva, and James Zastrow. The entire Zastrow family is engaged in anti-choice activities and they sometimes refer to themselves as the "Zastrow Holiness Revival Team." [redacted] siblings and father have been arrested for anti-choice activities in the past.

Zastrow is closely associated with [redacted] and [redacted].

Major Known Areas of Travel

Michigan, Kentucky

Affiliated Groups

ONElife for Life

Operation Save America

Arrests and Law Enforcement Contact

[redacted]

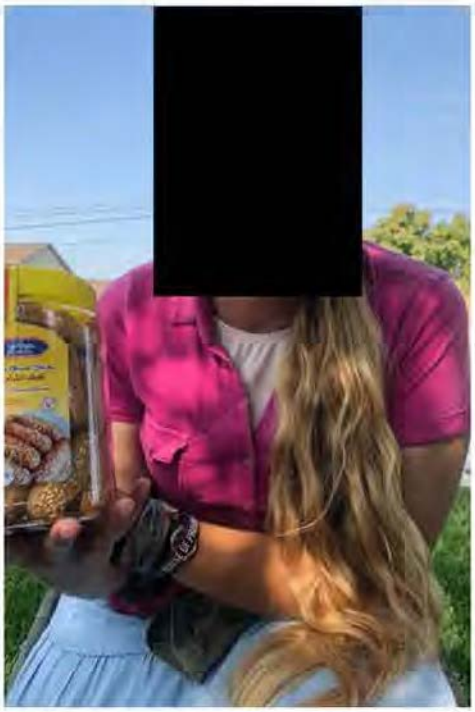
Activities and Other Info

Zastrow is a frequent protester at [redacted] in [redacted] and [redacted].

Statements/Press/Miscellaneous

January 26, 2019: Drag Queen Storytime draws small but noisy protest to [redacted] (Zastrow quoted)

Eva Zastrow



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:

- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

Eva is one of Cal and [redacted] Zastrow's [redacted] children. Her [redacted] siblings are [redacted], [redacted], and James Zastrow. The entire Zastrow family is engaged in anti-choice activities and sometimes refer to themselves as the "Zastrow Holiness Revival Team." Several members of the Zastrow family, including Eva, have been arrested at reproductive health care facilities in the past.

Zastrow is closely associated with Eva Edl, Coleman Boyd, [redacted], [redacted], Dennis Green, [redacted], Heather Idoni, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], James Zastrow, and [redacted].

Major Known Areas of Travel

Nationwide and International

Affiliated Groups

Operation Save America

Arrests and Law Enforcement Contact

March 5, 2021: Zastrow was arrested for trespassing while participating in a blockade at [redacted] in Mt. Juliet, TN, with [redacted], Eva Edl, [redacted], Dennis Green, [redacted] (minor), Heather Idoni, Cal Zastrow, James Zastrow, and three other minors.

August 27, 2020: Zastrow was arrested for trespassing while participating in a blockade at [redacted] in Sterling Heights, MI, with [redacted], Joel Curry, [redacted], [redacted], Eva Edl, [redacted], Heather Idoni, Justin Phillips, and Cal Zastrow.

[redacted]

Activities and Other Info

Zastrow participates in OSA protests with the rest of the Zastrow family and Eva Edl. She also frequently travels as a missionary.

December 2020-February 2021: Zastrow travelled to [redacted] to minister in a refugee camp.

October 22, 2020: Zastrow participated in a Red Rose Rescue clinic invasion at [redacted] but was not arrested.

Zastrow travelled to [redacted] a missionary in 2018 and to [redacted] in 2019.

Statements/Press/Miscellaneous

[redacted]

James "Jimmy" Zastrow



AKAs: [redacted]
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses: [redacted]
Phone Number: [redacted]
Website: [redacted]
Email: [redacted]

Social Media:
- **Facebook:** [redacted]
- **Twitter:** [redacted]
- **Instagram:** [redacted]
- **LinkedIn:** [redacted]
- **YouTube:** [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

James is the one of Cal and [redacted] Zastrow's [redacted] children. His [redacted] siblings are [redacted] and Eva Zastrow. The entire Zastrow family is engaged in anti-choice activities and sometimes refer to themselves as the "Zastrow Holiness Revival Team." Several members of the Zastrow family, including James, have been arrested at reproductive health care facilities in the past.

Zastrow is closely associated with Eva Edl, [redacted], Dennis Green, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], Eva Zastrow, and [redacted].

Major Known Areas of Travel

Nationwide

Affiliated Groups

Operation Save America

Arrests and Law Enforcement Contact

March 5, 2021: Zastrow was arrested while participating in a blockade at [redacted] in Mt. Juliet, TN with [redacted], Eva Edl, [redacted], Dennis Green, [redacted] (minor), Heather Idoni, Cal Zastrow, Eva Zastrow, and three other minors.

[redacted]

Activities and Other Info

Zastrow participates in OSA anti-abortion protests with the rest of the Zastrow family.

Statements/Press/Miscellaneous

[redacted]

Violence and Disruption Statistics Reports

[redacted]

Statistics submitted to NAF 2013-2019 (Export date: 06/15/2021)

[redacted]								
Type of Incident	***2013***	***2014***	***2015***	***2016***	***2017***	***2018***	***2019***	***Totals***
Murder	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Attempted Murder	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Bombing	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Arson	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Attempted Bombing/Arson	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Invasion	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Vandalism	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Trespassing	*157*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*157*
Butyric Acid Attacks	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Anthrax/Bioterrorism Threats	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Assault & Battery	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Death Threats/Threats of Harm	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Kidnapping	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Burglary	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Stalking	*2*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*2*
Hate Mail/Harassing Calls	*20*	*8*	*N/A*	*N/A*	*N/A*	*0*	*51*	*79*
Hate Email/Internet Harassment	*3*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*3*
Hoax Devices/Suspicious Packages	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Bomb Threats	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*
Picketing	*48*	*600*	*N/A*	*N/A*	*N/A*	*48*	*104*	*800*
Obstruction	*156*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*156*
Clinic Blockades	*0*	*0*	*N/A*	*N/A*	*N/A*	*0*	*0*	*0*

[redacted]

[redacted]								
Type of Incident	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**	**Totals**
Murder	0	0	N/A	N/A	0	0	0	0
Attempted Murder	0	0	N/A	N/A	0	0	0	0
Bombing	0	0	N/A	N/A	0	0	0	0
Arson	0	0	N/A	N/A	0	0	0	0
Attempted Bombing/Arson	0	0	N/A	N/A	0	0	0	0
Invasion	0	0	N/A	N/A	1	0	0	1
Vandalism	0	0	N/A	N/A	0	0	0	0
Trespassing	0	0	N/A	1	1	0	0	2
Butyric Acid Attacks	0	0	N/A	N/A	0	0	0	0
Anthrax/Bioterrorism Threats	0	0	N/A	N/A	0	0	0	0
Assault & Battery	0	0	N/A	N/A	0	0	0	0
Death Threats/Threats of Harm	0	0	N/A	N/A	0	0	0	0
Kidnapping	0	0	N/A	N/A	0	0	0	0
Burglary	0	0	N/A	N/A	0	0	0	0
Stalking	0	0	N/A	N/A	0	0	0	0
Hate Mail/Harassing Calls	1	0	N/A	N/A	10	11	16	38
Hate Email/Internet Harassment	0	0	N/A	N/A	0	0	2	2
Hoax Devices/Suspicious Packages	0	0	N/A	N/A	0	0	0	0
Bomb Threats	0	0	N/A	N/A	0	0	0	0
Picketing	36	169	N/A	N/A	222	247	279	953
Obstruction	0	0	N/A	N/A	0	0	0	0
Clinic Blockades	0	0	N/A	N/A	1	0	0	1

SENSITIVE INFORMATION.
Do not disseminate without prior written consent

NATIONAL ABORTION FEDERATION

[redacted]

[redacted]								
Type of Incident	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**	**Totals**
Murder	N/A	N/A	N/A	0	0	0	0	0
Attempted Murder	N/A	N/A	N/A	0	0	0	0	0
Bombing	N/A	N/A	N/A	0	0	0	0	0
Arson	N/A	N/A	N/A	0	0	0	0	0
Attempted Bombing/Arson	N/A	N/A	N/A	0	0	0	0	0
Invasion	N/A	N/A	N/A	0	0	0	0	0
Vandalism	N/A	N/A	N/A	0	0	0	0	0
Trespassing	N/A	N/A	N/A	0	0	0	0	0
Butyric Acid Attacks	N/A	N/A	N/A	0	0	0	0	0
Anthrax/Bioterrorism Threats	N/A	N/A	N/A	0	0	0	0	0
Assault & Battery	N/A	N/A	N/A	0	0	0	0	0
Death Threats/Threats of Harm	N/A	N/A	N/A	0	0	0	1	1
Kidnapping	N/A	N/A	N/A	0	0	0	0	0
Burglary	N/A	N/A	N/A	0	0	0	0	0
Stalking	N/A	N/A	N/A	0	0	0	0	0
Hate Mail/Harassing Calls	N/A	N/A	N/A	0	1	12	7	20
Hate Email/Internet Harassment	N/A	N/A	N/A	0	2	2	3	7
Hoax Devices/Suspicious Packages	N/A	N/A	N/A	1	0	0	0	1
Bomb Threats	N/A	N/A	N/A	0	0	0	0	0
Picketing	N/A	N/A	N/A	0	0	0	0	0
Obstruction	N/A	N/A	N/A	0	0	0	0	0
Clinic Blockades	N/A	N/A	N/A	0	0	0	0	0

SENSITIVE INFORMATION.
Do not disseminate without prior written consent

[redacted]

[redacted]								
Type of Incident	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**	**Totals**
Murder	N/A	N/A	0	0	0	0	0	0
Attempted Murder	N/A	N/A	0	0	0	0	0	0
Bombing	N/A	N/A	0	0	0	0	0	0
Arson	N/A	N/A	0	0	0	0	0	0
Attempted Bombing/Arson	N/A	N/A	0	0	0	0	0	0
Invasion	N/A	N/A	0	0	1	0	1	2
Vandalism	N/A	N/A	0	0	0	0	0	0
Trespassing	N/A	N/A	0	4	4	1	2	11
Butyric Acid Attacks	N/A	N/A	0	0	0	0	0	0
Anthrax/Bioterrorism Threats	N/A	N/A	0	0	0	0	0	0
Assault & Battery	N/A	N/A	0	0	0	0	0	0
Death Threats/Threats of Harm	N/A	N/A	0	0	0	0	0	0
Kidnapping	N/A	N/A	0	0	0	0	0	0
Burglary	N/A	N/A	0	0	0	0	0	0
Stalking	N/A	N/A	0	0	0	0	0	0
Hate Mail/Harassing Calls	N/A	N/A	0	3	100	129	209	441
Hate Email/Internet Harassment	N/A	N/A	0	1	65	21	84	171
Hoax Devices/Suspicious Packages	N/A	N/A	0	0	0	0	0	0
Bomb Threats	N/A	N/A	0	0	0	0	0	0
Picketing	N/A	N/A	50	64	605	688	883	2290
Obstruction	N/A	N/A	0	4	0	0	0	4
Clinic Blockades	N/A	N/A	0	0	0	0	0	0

SENSITIVE INFORMATION.
Do not disseminate without prior written consent

[redacted]

All Arizona Clinics (reported)								
Type of Incident	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**	**Totals**
Murder	0	0	0	0	0	0	0	0
Attempted Murder	0	0	0	0	0	0	0	0
Bombing	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Attempted Bombing/Arson	0	0	0	0	0	0	0	0
Invasion	0	0	0	0	2	0	1	3
Vandalism	0	0	0	0	0	0	0	0
Trespassing	157	0	0	5	5	1	2	170
Butyric Acid Attacks	0	0	0	0	0	0	0	0
Anthrax/Bioterrorism Threats	0	0	0	0	0	0	0	0
Assault & Battery	0	0	0	0	0	0	0	0
Death Threats/Threats of Harm	0	0	0	0	0	0	1	1
Kidnapping	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Stalking	2	0	0	0	0	0	0	2
Hate Mail/Harassing Calls	21	8	1	3	111	152	283	579
Hate Email/Internet Harassment	3	0	0	1	67	23	89	183
Hoax Devices/Suspicious Packages	0	0	0	1	0	0	0	1
Bomb Threats	0	0	0	0	0	0	0	0
Picketing	244	1109	58	64	827	983	1266	4551
Obstruction	156	0	0	4	0	0	0	160
Clinic Blockades	0	0	0	0	1	0	0	1

SENSITIVE INFORMATION.
Do not disseminate without prior written consent

NATIONAL ABORTION FEDERATION

Appendix A

Freedom of Access to Clinic Entrances (FACE) Act

Summary:

Section 248 of Title 18 protects the exercise of free choice in obtaining reproductive health services, and the exercise of First Amendment religious freedoms. Section 248 makes it unlawful for a person to use force, threat of force, or physical obstruction to intentionally injure or intimidate a person because he/she is or has been obtaining or providing reproductive health services. Section 248 also makes it unlawful for a person to use force, threat of force, or physical obstruction to intentionally injure or intimidate a person because he/she is lawfully exercising the right of religious freedom at a place of worship. Finally, Section 248 makes it unlawful for a person to intentionally damage or destroy the property of a facility because it provides reproductive health services, or because it is a place of worship. Section 248 also prohibits anyone from attempting to commit any of the above.

An offense under this statute is punishable by a range of fines and/or imprisonment up to a life term, depending upon the nature of the offense and whether or not it is a repeat conviction under this statute.

TITLE 18, U.S.C., SECTION 248

(a) Prohibited activities. – Whoever–

(1) by force or threat of force or by physical obstruction, intentionally injures, intimidates or interferes with or attempts to injure, intimidate or interfere with any person because that person is or has been, or in order to intimidate such person or any other person or any class of persons from, obtaining or providing reproductive health services;

(2) by force or threat of force or by physical obstruction, intentionally injures, intimidates or interferes with or attempts to injure, intimidate or interfere with any person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship; or

(3) intentionally damages or destroys the property of a facility, or attempts to do so, because such facility provides reproductive health services, or intentionally damages or destroys the property of a place of religious worship,

shall be subject to the penalties provided in subsection (b) and the civil remedies provided in subsection (c), except that a parent or legal guardian of a minor shall not be subject to any penalties or civil remedies under this section for such activities insofar as they are directed exclusively at that minor.

(b) Penalties. – Whoever violates this section shall–

(1) in the case of a first offense, be fined in accordance with this title, or imprisoned not more than one year, or both; and

(2) in the case of a second or subsequent offense after a prior conviction under this section, be fined in accordance with this title, or imprisoned not more than 3 years, or both;

except that for an offense involving exclusively a nonviolent physical obstruction, the fine shall be not more than $10,000 and the length of imprisonment shall be not more than six months,

or both, for the first offense; and the fine shall, notwithstanding section 3571, be not more than $25,000 and the length of imprisonment shall be not more than 18 months, or both, for a subsequent offense; and except that if bodily injury results, the length of imprisonment shall be not more than 10 years, and if death results, it shall be for any term of years or for life.

(c) Civil remedies. –

(1) Right of action. –

(A) In general. —

Any person aggrieved by reason of the conduct prohibited by subsection (a) may commence a civil action for the relief set forth in subparagraph (B), except that such an action may be brought under subsection (a)(1) only by a person involved in providing or seeking to provide, or obtaining or seeking to obtain, services in a facility that provides reproductive health services, and such an action may be brought under subsection (a)(2) only by a person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship or by the entity that owns or operates such place of religious worship.

(B) Relief. —

In any action under subparagraph (A), the court may award appropriate relief, including temporary, preliminary or permanent injunctive relief and compensatory and punitive damages, as well as the costs of suit and reasonable fees for attorneys and expert witnesses. With respect to compensatory damages, the plaintiff may elect, at any time prior to the rendering of final judgment, to recover, in lieu of actual damages, an award of statutory damages in the amount of $5,000 per violation.

(2) Action by Attorney General of the United States. –

(A) In general. —

If the Attorney General of the United States has reasonable cause to believe that any person or group of persons is being, has been, or may be injured by conduct constituting a violation of this section, the Attorney General may commence a civil action in any appropriate United States District Court.

(B) Relief. —

In any action under subparagraph (A), the court may award appropriate relief, including temporary, preliminary or permanent injunctive relief, and compensatory damages to persons aggrieved as described in paragraph (1)(B). The court, to vindicate the public interest, may also assess a civil penalty against each respondent–

(i) in an amount not exceeding $10,000 for a nonviolent physical obstruction and $15,000 for other first violations; and

(ii) in an amount not exceeding $15,000 for a nonviolent physical obstruction and $25,000 for any other subsequent violation.

(3) Actions by State Attorneys General. –

(A) In general. —

SENSITIVE INFORMATION.
Do not disseminate without prior written consent
NATIONAL ABORTION FEDERATION

If the Attorney General of a State has reasonable cause to believe that any person or group of persons is being, has been, or may be injured by conduct constituting a violation of this section, such Attorney General may commence a civil action in the name of such State, as parens patriae on behalf of natural persons residing in such State, in any appropriate United States District Court.

(B) Relief. —

In any action under subparagraph (A), the court may award appropriate relief, including temporary, preliminary or permanent injunctive relief, compensatory damages, and civil penalties as described in paragraph (2)(B).

(d) Rules of construction. — Nothing in this section shall be construed--

(1) to prohibit any expressive conduct (including peaceful picketing or other peaceful demonstration) protected from legal prohibition by the First Amendment to the Constitution;

(2) to create new remedies for interference with activities protected by the free speech or free exercise clauses of the First Amendment to the Constitution, occurring outside a facility, regardless of the point of view expressed, or to limit any existing legal remedies for such interference;

(3) to provide exclusive criminal penalties or civil remedies with respect to the conduct prohibited by this section, or to preempt State or local laws that may provide such penalties or remedies; or

(4) to interfere with the enforcement of State or local laws regulating the performance of abortions or other reproductive health services.

(e) Definitions. – As used in this section:

(1) Facility. —

The term "facility" includes a hospital, clinic, physician's office, or other facility that provides reproductive health services, and includes the building or structure in which the facility is located.

(2) Interfere with. —

The term "interfere with" means to restrict a person's freedom of movement.

(3) Intimidate. —

The term "intimidate" means to place a person in reasonable apprehension of bodily harm to him- or herself or to another.

(4) Physical obstruction. —

The term "physical obstruction" means rendering impassable ingress to or egress from a facility that provides reproductive health services or to or from a place of religious worship, or rendering passage to or from such a facility or place of religious worship unreasonably difficult or hazardous.

(5) Reproductive health services. —

The term "reproductive health services" means reproductive health services provided in a hospital, clinic, physician's office, or other facility, and includes medical, surgical, counseling or referral services relating to the human reproductive system, including services relating to pregnancy or the termination of a pregnancy.

(6) State. —

SENSITIVE INFORMATION:
Do not disseminate without prior written consent
NATIONAL ABORTION FEDERATION

The term "State" includes a State of the United States, the District of Columbia, and any commonwealth, territory, or possession of the United States.

SENSITIVE INFORMATION:
Do not disseminate without prior written consent

NATIONAL ABORTION FEDERATION

EXHIBIT 046

From: Emma Goldberg <[redacted]@prochoice.org>
To: "Patel, Sanjay (CRT" <[redacted]>, "Cowall, Laura (CRT" <[redacted]>,n"Smith,nKatelyn (CRT" <[redacted]>
Cc: Michelle Davidson <[redacted]@prochoice.org>
Subject: NAF - Social Media Posts and OSA Info
Date: Thu, 13 May 2021 17:32:35 -0400
Importance: Normal
Attachments: 20210511-ONS.pdf
Inline-Images: image001.jpg; image002.png; image003.png

Hello DOJ Team,

Please find the attached document with recently discovered anti-choice social media posts. Additionally, I'm including a Facebook post from Cal Zastrow today that commemorates the fourth anniversary of the blockade in Louisville at EMW in 2017, that reads, "Come join us for more." In a comment on a related post about the 2017 blockade from [redacted], he calls for more "rescues" and says its "normal Christian behavior". Both are screenshotted below:

[redacted] **Cal Zastrow**
1h ·

Happy 4th Anniversary of the Louisville Rescue!
This is what peacemaking is.
This is what loving your doomed preborn neighbor looks like.
This is what law-keeping looks like in a nation of violence and lawlessness.
This is Immediatism.
This is Christian interposition.
Sacrificial love, as an act of worship to Jesus.
This is Rescue.
Come join us for more.



[redacted] Coleman Boyd [redacted] and 20 others — 2 Comments 2 Shares

Like — Share

[redacted] **Cal Zastrow**
[redacted] Oma Eva [redacted]
Dennis Green [redacted]



Passing this along since the OSA regional event in Alabama begins tonight in Birmingham and runs through Saturday May 15, and we expect Zastrow and several of the individuals [redacted] at the Louisville blockade will be attending this event as well. Zastrow was more recently [redacted] at the blockades at [redacted] in MI (8/27/20), [redacted] in AR (1/15/21), and [redacted] in TN (3/5/21).

Please reach out if you have any questions or if we can assist further.

Thank you for your continued efforts.

Emma Goldberg
Pronouns: she, her, hers
Security Operations and Opposition Research Coordinator
National Abortion Federation

(T) [redacted]
(E) [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 047

From: Michelle Davidson <[redacted]>
To: "[redacted]" <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>, Emma Goldberg <[redacted]@prochoice.org>
Subject: More RRR info
Date: Thu, 20 Aug 2020 10:42:37 -0400
Importance: Normal
Attachments: 201905-RWW-RRR_Art.pdf; [redacted]; Handy-Statements.docx

---

Hi Sanjay,

Attached is more info on the Red Rose Rescue individuals and the group itself. Again, please pass these on to Aaron along with the previous email if you think it might be useful to his department. I hope you have a good weekend.

-M

To our readers: Right Wing Watch, a project for People For the American Way, is run by a dedicated staff driven to shed light on the activities of right-wing political organizations. As a non-profit working hard every day to expose the Far-Right's extreme and intolerant agenda, our main source of support is donations from readers like you. **If you use Right Wing Watch, please consider making a contribution to support this content.**

MENU

$ DONATE

Meet the Farm Team of the Radical Anti-abortion Activist Movement

<https://www.rightwingwatch.org/post_author/robin-marty/>By Robin Marty <https://www.rightwingwatch.org/post_author/robin-marty/> | May 15, 2019 5:15 pm



Anti-abortion activist Lauren Handy photographs her handiwork on the facade of a Planned Parenthood clinic in Washington, D.C. Photo (c) 2019 Robin Marty

It was bitterly cold, even for January. A frigid wind cut through my cloth gloves as the sun slowly dipped behind the white stone façade of Planned Parenthood's Carol Whitehill Moses Center in Washington, D.C. The clinic, which offers abortions and other health-care services to patients in the nation's capital, had already closed for the day. The guards were gone from the entrance; the clinic escorts–volunteers dressed in bright vests, who help patients navigate the continent of protesters who customarily greet them—had all gone for the day. Instead, a glance through the glass doors showed a lone security person inside, likely remaining on duty until all of the staff and patients left for the evening.

Lauren Handy, a 25-year-old anti-abortion activist, waved at the man at the desk, calling out to him by name. He ignored her as if it were his job—which, for the most part, it was. As a graduate and current alumni organizer of the youth-oriented group, Survivors of the Abortion Holocaust, Handy is a familiar presence in the clinic's neighborhood.

The D.C. Planned Parenthood building is always the center of bustling activity during the days surrounding the March for Life, an annual gathering where tens of thousands of abortion opponents—many of them high school- and college-aged—are bused in from around the country. When the clinic moved locations three years ago <https://www.washingtonpost.com/local/education/new-abortion-clinic-moving-in-next-to-charter-school-creating-concerns/2015/09/08/90cdd26c-5323-11e5-933e-7d06c647a395_story.html?utm_term=.48a87a4163b0>, reopening across the street from a neighborhood elementary school, the activists moved with it, bringing with them their annual protest welcoming the out-of-towners, which they conduct the day before the march itself.

As Handy wrestled with her skirts against the wind and the pile of equipment at her feet, two large coach-style buses pulled up in front of the clinic and young people poured out from the open doors. Bundled against the unaccustomed cold, roughly 50 high school students from Baton Rouge, Louisiana, lined the edges of the sidewalk directly across the street from the clinic—careful to

leave the sidewalk itself open for foot traffic—silently standing as a priest offered a “Hail Mary” and “Our Father.” Just minutes later the students turned and left to re-board their buses, their vigil over as quickly as it had begun.

Any one of those students could easily be the next Lauren Handy. Like them, she also made the trek to D.C. from Baton Rouge this year to attend the March for Life. But unlike the shivering students bounding from the buses in their matching white stocking caps and bright green scarves, Handy wasn’t in D.C. for camaraderie, or to merely celebrate the wins that the anti-abortion movement had seen in the two years that Republican President Donald Trump had been in office, or to simply cheer on the possibility that the United States may be just a year or two from overturning the Supreme Court decision, *Roe v. Wade*, which would send the right to a legal abortion back to each state to decide.

No, Handy was in town to end abortion completely, through whatever means possible.

Handy was in town to end abortion completely, through whatever means possible.

The Survivors of the Abortion Holocaust could in many ways be thought of as the “farm team” of the radical anti-abortion activist movement. Officially launched in 1998 by Jeff White, a former Operation Rescue leader from California, Survivors quickly became the go-to place for young activists interested in learning how to hone their skills in abortion debate, protesting in public spaces and asserting their First Amendment rights while doing both.

Deeming anyone born after 1973—the year that the Supreme Court decided *Roe*—to be a "survivor" because they were born after abortion was deemed a federally protected constitutional right, Survivors accepts anyone between the ages of 13 and 29 into the fold for camps and trainings.

Many of those who attend these events are children of anti-abortion activists, or friends of children who already attended. Most new recruits come to Survivors via personal referrals. According to their website, in the roughly two decades that Survivors has been operating "hundreds" of Survivors <http://www.survivors.la/annual-summer-bootcamp> have gone through the camp, with a number of them eventually moving on into leadership in other anti-abortion organizations, or even starting their own.

For example, Keith Mason, a former Survivor, founded Personhood USA, the Colorado anti-abortion group best known for its repeated efforts to try to get the state voters to approve an amendment stating life begins at conception. Abortion-Free New Mexico, the southwestern organization dedicated to trying to shut down later abortions in Albuquerque, is led by Bud and Tara Shaver <https://www.vice.com/en_us/article/exmngz/the-new-face-of-the-anti-abortion-movement>, both graduates of the Survivors. Stanton Healthcare <http://www.stantonhealthcare.org/>, the growing network of antiabortion pregnancy and sexual health centers hoping to be the next "pro-life Planned Parenthood" (without offering any form of contraception) is the project of another Survivor, Idaho's Brandi Swindell. Stand True, the national youth ministry arm of Priests for Life, was founded by Bryan Kemper, who not only was recruited by White while Operation Rescue was still in at its peak influence, but has continued to partner with White ever since, including assisting in Survivor trainings as a mentor.

White's founding of Survivors wasn't the first attempt to recruit and weaponize younger activists for the abortion battle. For much of its history, Operation Rescue National included a youth ministry that continued even during its breakup and reorganization and eventual name-change to Operation Rescue/Operation Save America.



<http://files.rightwingwatch.org/uploads/img_7520.jpg>
Anti-abortion activists stage a "die-in" outside the U.S. Supreme Court in January 2019. Photo (c) 2019 Robin Marty

Another youth-oriented anti-choice group was CALL (Collegian Activated to Liberate Life), an organization that was active in the 1990s, which encouraged students to dedicate one year of their education to living in a communal home and working to end abortion in their local areas. This quest involved everything from sidewalk chalking anti-abortion messages on sidewalks and holding "die-ins"—a form of activism where students lay on the streets in the fetal position, draped in red cloth—to protesting pro-choice speakers or picketing at abortion clinics, or even "rescuing"—blocking clinic entrances or other avenues to ensure doctors and patients were unable to enter buildings to terminate a pregnancy. Rock for Life and Generation Life also worked to recruit students into the movement, all hoping to bring more younger activists to the cause that began as being historically dominated by the elderly.

“Back in those days [the 1970’s and 80’s], you know what we called a pro-life rally with 50 year olds? A youth rally,” Reverend Pat Mahoney quipped to me as we waited for a “die in” to begin at the Supreme Court. Mahoney, a longtime activist and one of the founders of CALL, still continues to work as an organizer in the pro-life youth movement.

In 1994 the Freedom of Access to Clinic Entrances (FACE) Act prevented the movement from conducting the “rescues” that had become synonymous with pro-life activism, and which by this point had evolved from crowds of protesters blocking clinics with their bodies to include smaller groups that chained themselves to doors, cement blocks, broken-down vehicles and, of course, each other, in order to make their removal from clinic sites all the more difficult. At the height of the “rescue” movement, clinics could be closed for hours or even days because of anti-abortion protesters sitting by the hundreds in doorways, surrounding the cars of providers so they couldn’t leave their homes to get to the clinics where they worked, or even rushing inside and breaking equipment like the suction machines commonly used in abortion procedures.

Born after the FACE Act took effect with its new limitations on anti-abortion protesting, leaders of Survivors of the Abortion Holocaust had to decide where this new line was drawn between impeding clinic access and expressing a First Amendment right to protest. Once they established parameters, they would train future anti-abortion leaders to push that line as far as they possibly could. The die-ins popularized by CALL became a favorite Survivor tactic, and while abortion opponents could no longer directly block clinics, they could still protest in front of them on public sidewalks and easements. They also concentrated on protesting the homes of abortion providers themselves, a tool that lost popularity among other anti-abortion activist groups after a streak of violence against abortion providers in the mid-1990s. Meanwhile, the group also trained and unleashed the new Survivors in the streets in an effort to change the public’s mind on abortion one person at a time, using graphic signs and street displays to draw bystanders in, to be treated to the young activists’ newly learned talking points.

MENU

Survivors quickly became known for their in-your-face confrontations.

Survivors quickly became known for their in-your-face confrontations, tactics that sometimes badly hurt their movement. In 2013, when the city of Albuquerque, New Mexico, considered a ballot measure that would forbid abortion after 20 weeks of pregnancy, Survivors swarmed the city to rally support for the ban. One day they protested the home of a local doctor who was providing these later abortions, terrifying the practitioner's wife <https://www.abqjournal.com/247606/docs-home-target-of-abortion-protest.html>, who called the police to disperse them. The Survivors activists—mostly teens—passed out postcards with the names and photos of doctors doing later abortions in the city, calling them the "Killers Among Us <https://prospect.org/article/anti-choicers-new-mexico-experiment>." They even took their large graphic images of fetal remains to the local Holocaust Museum <https://www.vice.com/en_us/article/exmngz/the-new-face-of-the-anti-abortion-movement> in an effort to engage voters and solicit media attention.

They got the attention, but it didn't translate into support at the polls. The ballot measure failed 55-44, with pundits pointing to "overzealous <https://www.abqjournal.com/304288/abq-clerk-aggressive-protesters-draw-complaints.html>" abortion opponents as a key factor in the loss.

Then again, winning legislative victories isn't a primary goal of Survivors, who believe that it takes direct action and agitation to ensure that America wakes up from its complacency about the existence of legal abortion. It's for that reason that the group increasingly focuses on actions that don't just make abortion supporters uncomfortable, but sometimes their own allies, too.

Graphic fetal images displayed outside of schools or in other public areas where young children might see them is one topic of disagreement. Another is over giving the young people in their ranks—many of them minors—the autonomy to run their own protests and actions, even if they are toeing the line of legality under the FACE Act. When it comes to protesting clinics or other public actions, the Survivors trainees are in charge of the mission. That could mean having 13-year-old children not only participating in protests, but often serving as media spokespeople and police liaisons, too.



<http://files.rightwingwatch.org/uploads/img_8996.jpeg>

Lauren Handy (center) of the anti-choice group Survivors of the Abortion Holocaust and colleagues display movement recruitment signs in Washington, D.C. Photo (c) 2019 Robin Marty

The tactics used by Operation Rescue are based around the notion that fertilized eggs, embryos and fetuses are “babies” whose lives can be “rescued” if abortion clinics are unable to serve patients. Activists who deploy such tactics as clinic barricades are said to be conducting “rescues.” According to Handy, Survivors doesn’t train their campers to revive “rescue” tactics *per se*, but they do make sure they are aware of the rescue movement’s history. They

are now also adding in the newly launched Red Rose Rescues <https://www.rightwingwatch.org/post/the-new-rescues-how-abortion-opponents-are-testing-the-limits-of-the-face-act/>, a more moderate, less blatantly FACE-violating form of "rescue," where activists enter clinics carrying roses, urge patients to leave, and refuse to exit the clinic until police physically remove them from the building. As for whether that could be seen as encouraging a new generation of potential lawbreakers, well, that's up to the recruits themselves.

"Of course, because they're kids, they like the war stories," Handy tells me. "They get hyped up and everything like that. Red Rose Rescue, it's really sparked the spirit of rescue again. That hope of doing a tangible, sacrificing witness—kids who are so passionate, they're drawn to that. They need an outlet, a physical outlet, and there's only so much protesting [in a legal manner] can do."

So does Handy believe in encouraging teens to violate the FACE Act? When I ask her, she pauses for a few seconds. "Oh gosh, you're going to quote me on this," she says, hesitating, then adds in a rush, "Whatever. I believe minors should rescue because at 18 the records get sealed."

Handy's belief in letting minors take the lead on actions that could potentially lead to arrest isn't uncommon in the movement. "Children's Rescue" was a regular component of pre-FACE "rescues," one that was particularly effective because of police officers' discomfort with arresting and physically removing minors from a clinic. The fact that so few people are currently advocating for minors to undertake full-fledged "rescues" in order to test out the Trump administration's stance on upholding FACE might be the biggest sign that abortion opponents believe they are on the verge of winning the battle to end legal abortion. After all, why poke an administration that is already so obviously in your favor?

Handy joined the Survivors herself when she was 19, already too late to avoid the advantages of stretching the boundaries of the law as a minor. In 2015 <https://www.gettyimages.com/detail/news-photo/capitol-police-arrest-lauren-handy-third-from-left-of-anti-news-photo/467496470> she was arrested in Washington, D.C., with a handful of other activists for refusing to leave the entrance to the office of then-Speaker of the House John Boehner, after the Republican leader refused to hold a House vote on a bill which would have banned abortion throughout the nation after 20 weeks post-fertilization, with no exceptions for sexual assault or fetal anomalies. More recently, Handy was arrested <https://www.lifesitenews.com/news/priest-two-women-arrested-after-entering-abortion-center-to-save-unborn-bab> for her part <https://www.lifesitenews.com/news/priest-two-women-arrested-after-entering-abortion-center-to-save-unborn-bab> in a Red Rose <https://www.lifesitenews.com/news/priest-two-women-arrested-after-entering-abortion-center-to-save-unborn-bab>“ <https://www.lifesitenews.com/news/priest-two-women-arrested-after-entering-abortion-center-to-save-unborn-bab>rescue <https://www.lifesitenews.com/news/priest-two-women-arrested-after-entering-abortion-center-to-save-unborn-bab>” in Washington, D.C., another in Alexandria, Virginia <https://www.lifesitenews.com/news/pro-lifers-found-guilty-but-walk-free-after-witnessing-inside-abortion-cent>, and then yet another D.C. “rescue” just this March <https://www.lifesitenews.com/news/2-priests-7-pro-lifers-risk-arrest-by-entering-abortion-facilities-this-morning>. So far none of Handy’s arrests have resulted in jail time, but should that be her fate, she’s not daunted by the idea. “It would be a great time to start a prison ministry,” she said.

Undaunted by the prospect of incarceration, Handy said, 'It would be a great time to start a prison ministry.'

That's not an unusual outcome for "rescuers" who land in jail. According to Handy, White himself ran Operation Rescue National for six months out of a jail kitchen while serving one of the many sentences he racked up <https://www.laweekly.com/news/operation-miscue-2134609> as a prominent anti-abortion organizer. And he very well may end up running Survivors from there, too. In October of 2018, White accepted a plea deal for defrauding the federal government of $27 million through illegal drug rehabilitation program enrollments, a scheme which allegedly netted White between $3,000-$7,500 per patient in kickbacks <https://www.thedailybeast.com/anti-abortion-extremist-swindled-millions-in-obamacare-rehab-ripoff>; White is facing five years in prison for his actions. While he admits his guilt, both he and his supporters argue that his motivation was primarily to help homeless addicts get the help they needed—and to take advantage of a government program to foot the bill.

"I believe it's a form of rescue in itself," Handy explained, saying that White's actions are similar to a "Robin Hood" situation: Robbing the rich to help the poor. "He was using that money to… make sure people could get into rehab. Basically finding loopholes to ensure people can get quality healthcare. I always call him the Robin Hood, especially in this sense. Yeah, screw over the rich to help [poor people]. I have no problem with that, but some people think it looks like he tarnished the movement, and people have distanced themselves from us. I mean that's their decision and that's what people live with. But Survivors are survivors. I mean, would you expect anything less?"

Although the prospect of going to jail doesn't seem to frighten Survivors, the vast majority of their current agitation campaigns are more guerrilla tactic than FACE-challenging. Legal or not, they definitely draw attention—along with the ire of pedestrians, clinics and police.

As Handy struggled with a projector she intended to use to splash text and images on the Planned Parenthood building, I watched her suddenly jump up to dash after one woman who emerged from the clinic doors.

“You don’t have to work here!” Handy shouted. “I don’t work there, bitch!” the woman retorted, speed-walking down the sidewalk away from us.

“She works here,” Handy told me in a conspiratorial tone, settling back down with her projector.

While I spent the evening in the cold with Handy and two other activists (who were not current or former Survivor members), it was evident that no one was happy with the projections she was trying to display on the Planned Parenthood clinic walls.



<http://files.rightwingwatch.org/uploads/img_7194.jpeg>

Anti-abortion activist Lauren Handy wields her light-projector against the facade of a Planned Parenthood clinic in Washington, D.C. Photo (c) 2019 Robin Marty

Once it became clear that Handy was too close to the building for the projections to be effective, she crossed the street to try again. Careful not to block the sidewalk, which she knew would be a violation, Handy moved her

equipment into the edge of the street to position the projector. A young man walking by who appeared to be in his 20s approached her and demanded that she move.

“This is a bike lane. You can’t be here,” he told her.

We hadn’t seen a bike come through in the hour we had been outside.

“Thanks for letting us know,” one of Handy’s companions told him, turning back to the machine.

The objector stepped even closer. “You have to move. This is a bike lane. You have to keep it clear for bikes.”

The three activists thanked him again and continued to ignore him.

After a few minutes of continuing to tell them to get out of the bike line, the man then jumped in front of Handy’s projector, blocking the image from the walls. A small, white-lit fetus now appeared on his red jacket as he jumped up and down in front of Handy’s machine.

Hoping to defuse the confrontation, I asked the agitated passerby if he would come talk to me for a second, to which he reluctantly agreed. “I think I can get them to move, but I need you to leave or they won’t do it,” I told him, explaining that I wasn’t with the group but might be able to sway them regardless. He agreed, then threw a dirty look at Handy and left.

She moved her equipment out of the lane once he was gone. “I just really don’t like people thinking they can tell me what to do, and be rude about it,” she said, smiling.

It was clear that this was the sort of reaction that Survivors are used to. Soon after, another man who appeared to live in the neighborhood came to argue about abortion with the anti-abortion activists, who by this point had been joined by two Red Rose Rescuers, too. Voices grew louder on both sides as two men went in circles over the right to life and the obligation of a woman to remain pregnant if she conceives.

Soon a police car pulled up next to us. “What’s going on here?” an officer asked as he stepped out of the vehicle.

“We are just here expressing our First Amendment rights,” Handy responded, as her companions took out phones to record any possible confrontation.

“And how long exactly do you plan to be doing this for?” he asked.

“Probably another 30 minutes,” she answered.

As the officer got back in his car, she leaned over and told me, “The clinic called them on us.” Handy claims that having the police called on her is a regular occurrence when she’s around a facility that provides abortion services.

The clinic building was now awash in glowing images: “Planned Parenthood Is Evil,” “Planned Parenthood is Bad Business,” “Fetal Uprising” (with a picture of a skeletal fetus curled beside the text). After 30 minutes of projector-messaging, the group was ready to move on to a new location, this time far away from any abortion clinics.

“Survivors are the Marines of the pro-life movement,” Handy told me. “First ones in, last ones out.” And at the Planned Parenthood, you can be certain staff, neighbors and police were all glad to see them finally go.

Date: August 14, 2020



--

Date: July 19, 2020



--

Date: June 15, 2020



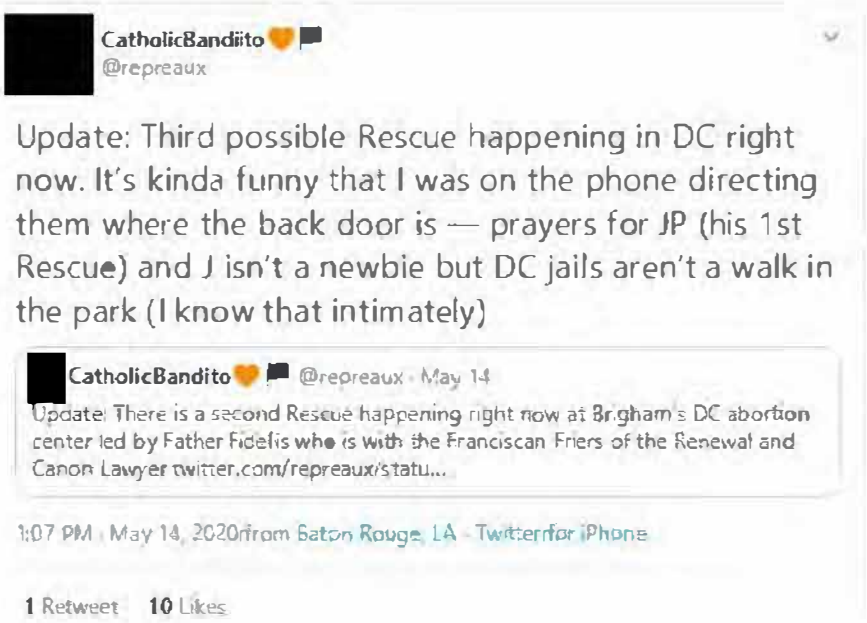
--

Date: May 29, 2020



--

Date: May 14, 2020



--

Date: May 13, 2020

[redacted] **Lauren Handy** is feeling thoughtful.
May 13 ·

Beautiful write up by fellow Rescuer [redacted] about the Grand Rapids Red Rose Rescue this morning.

I have this clenching feeling in my heart wanting so desperately to join in the next Rescue.

I miss my friends and co laborers



> **Red Rose Rescue** is feeling hopeful in [redacted]
> May 13
>
> Today in Grand Rapids, Michigan, Red Rose Rescue held it's first "parking lot rescue" mission. For four hours the rescuers courageously brought roses, kind words of support, and God's love to abortion-bound couples on both the sidewalk and then in the parking lot of the killing facility. A number of mothers and fathers accepted the gift of roses.

--

Date: December 13, 2019

[redacted] CatholicBandito [redacted]
@repreaux

At the Pomona Planned Parenthood and I mushed myself under the fence to be able to better reach the abortion minded moms. I left resources inside the fence. I've never been here before but the security guard apparently knew me and was yelling, "You can't do that [redacted]!" 😂😂



12:36 PM · Dec 13, 2019 · Twitter for iPhone

3 Retweets and comments 20 Likes

--

Date: September 27, 2019



--

Date: September 23, 2019

[redacted]
September 23, 2019 ·

"Going into an abortion center to save babies is what any Christian should do." - Lauren Handy



LIFESITENEWS.COM

Charges dropped after priest, 3 pro-lifers arrested for entering abortion center

Lauren Handy and 11 others

--

Date: September 5, 2019

[redacted] **Lauren Handy**

September 5, 2019 ·

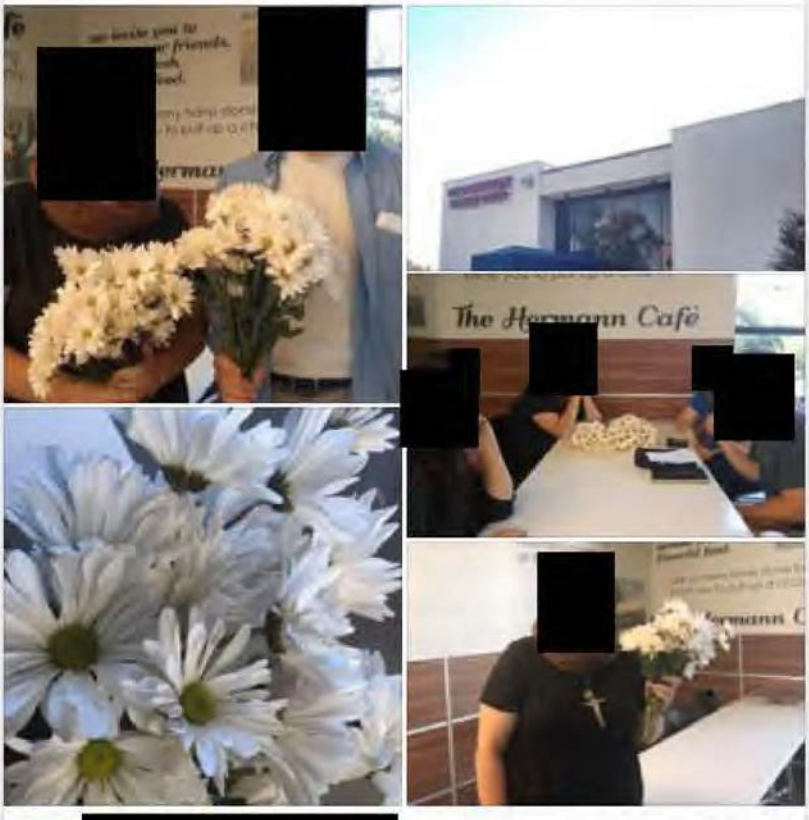
Today the sidewalk extended into the lobby of a Houston abortion facility. Everything was calm while moms took our flowers and pregnancy resources. [redacted] was comforting a girl who was crying even before we went inside. I was able to successfully give out info to 3 Spanish couples and [redacted] talked with a mom for a good 5mintues.

There where no arrests. Why?

This type of Rescue is called a Window of Opportunity Rescue. We go in and out before the cops come. Passing out white flowers and praying with abortion minded couples. This was inspired by the Rescues lead under [redacted] [redacted] of Operation Rescue West in the late 80s

Those who wish to go inside the lobbies but can't risk arrest this is a type of Rescue that might be good for you to do.... I have been participating in Window of Opportunity Rescues for the last 6 years during the Christmas season and when ever the "opportunity" arises.

Peace and Love.
Servant to the Abandoned, Unloved and Rejected



[redacted] and 88 others 26 Comments 4 Shares

--

Date: February 28, 2019

[redacted] **Lauren Handy**
February 28, 2019 ·

'Legality' is not synonymous with justice. In the Nuremberg trials, the defense of 'I was just following the law' was rejected. #RRR #ImGoingIn #WWJD

READ: tinyurl.com/y8r8pt8e



About this website

LIFESITENEWS.COM

Weep not for pro-life prisoner Mary Wagner but become more like her

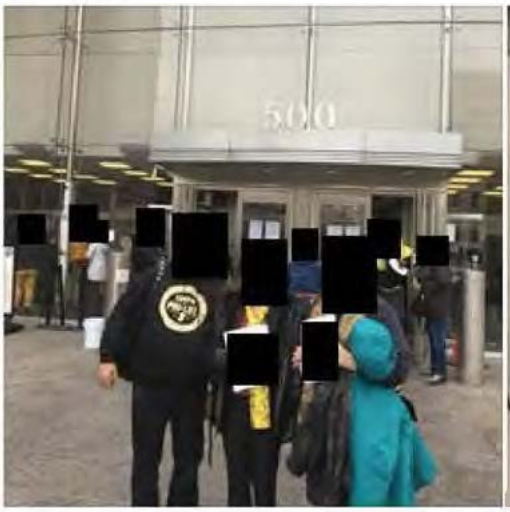
[redacted] and 9 others 6 Shares

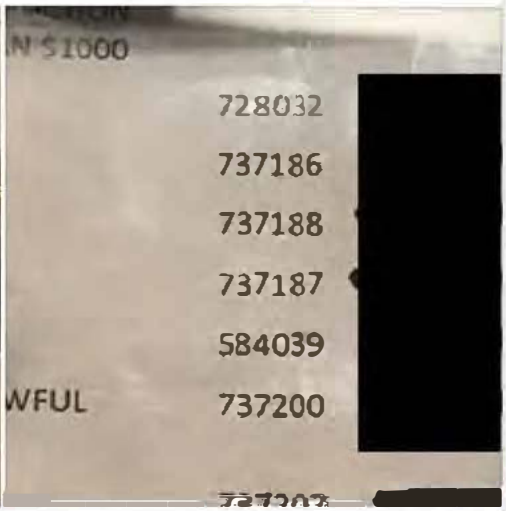
--

Date: January 29, 2019

Lauren Handy is with [redacted] and 2 others.
January 29, 2019 ·

Charges dropped!! On to the next one! #RRR #ImGoingIn





75 11 Comments 7 Shares

Date: August 17, 2020

https://www.facebook.com[redacted]

(02:05) "We continue to do Red Rose Rescues, we will continue to try to save babies' lives, we have saved many many many babies' lives, through Red Rose Rescues"

Date: May 2, 2020

https://www.facebook.com[redacted]

(12:30) "Whether we enter the waiting rooms of these stand alone abortion facilities, or whether we enter into these high rise buildings, which is what I do I go into these high rise buildings and after were asked to leave the waiting rooms we go in the hallway and we stay in the hallway risking arrest, I've been arrested 4 times as I said, many many babies have been saved because many many women have turned around and left over the course of these RRRs many other women cannot access their appointments. We know that when that happens there is a good possibility a high percentage that they will not reschedule the appointment thinking the same thing is going to happen again. My little mantra on social media is RRRs save lives and protect mom's from abortion..."

(13:45) "We're planning on re-initiating Red Rose Rescues. The hiatus had to do a little bit to do with COVID-19, but this is a way in which we have revisited the rescue movement that was so prevalent in the late 80s and early 90s where 70,000 people throughout the country did peaceful protests... 70,000 people got arrested, tens of thousands of people entered the movement. This is what Red Rose Rescues are, trying to save babies intervening to save a baby's life, and indeed being a witness, standing in witness for the babies, while the babies are dying we refuse to leave these facilities we stay in solidarity with the babies while thy are dying even to the pint of risking arrest and event of the point of spending time in jail and many of these RRRs have spent time in jail. It's a significant movement, if you want more information you can go to RRR.com to get more information and to register and we'll be in touch with you"

(20:00) "So we decided to do whatsidewalk advocates is not doing, instead of setting up on the sidewalk we've extending the sidewalk into the buildings and we've had tremendous success saving babies, turning moms around, brining attentions to these two very evil abortionists."

EXHIBIT 048

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Michelle Davidson" <[redacted]@prochoice.org>
Subject: RE: More RRR info
Date: Thu, 20 Aug 2020 15:38:53 -0400
Importance: Normal

Thanks, Michelle.
Besides Handy, can you send me the names of the other defendants whose cases are pending in DC?
And, if you have any case info (like case number, etc) I'll take that too.
It will make it easier for me to track down the assigned prosecutor.
SP

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Thursday, August 20, 2020 10:43 AM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: More RRR info

Hi Sanjay,

Attached is more info on the Red Rose Rescue individuals and the group itself. Again, please pass these on to Aaron along with the previous email if you think it might be useful to his department. I hope you have a good weekend.

-M

EXHIBIT 049

From: Michelle Davidson <[redacted]@prochoice.org>
To: "[redacted]" <[redacted]>
Cc: Tara Gannon <[redacted]prochoice.org>, Emma Goldberg <[redacted]@prochoice.org>
Subject: Red Rose Rescue Info Requested
Date: Tue, 18 Aug 2020 19:39:57 -0400
Importance: Normal
Attachments: 19951031-Moscinski_C-Art.pdf; 19970120-Moscinski_C-Art.pdf; 1997-Moscinski_C-Art.pdf; Red_Rose_Rescue-Chronology.docx
Inline-Images: image002.gif

Hi Sanjay,

Feel free to share this with Aaron as well. He replied to my previous email wanting to know if any action from Handy occurs. It might be useful for him to have the timeline as well. I also attached some articles on Moscinski that go pretty far back. Let me know if you need anything else. I'll definitely keep you posted if we hear of any attempts at clinics right away.

Case Numbers:
Lauren Handy, [redacted], File Date 3/20/19
[redacted], File Date 8/18/2020
[redacted], File Date 8/18/2020
Christopher Moscinski, [redacted] File Date 8/12/2020
[redacted])
William Goodman, [redacted] FIle Date 8/12/2020

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C: [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

http://www.aclu.org/news/w012097b.html

January 20a 1997: Abortion Protestors Win 'Scary' Ruling

NEW YORK -- In what the New York Times calls a "novel ruling that has startled both sides in the abortion debate," a federal judge has decided that two anti-abortion protesters committed no crime when they blocked access to a Westchester County clinic because they were motivated by "conscience-driven religious belief."

The protesters, a retired Roman Catholic auxiliary bishop and a Franciscan friar, could have been found in criminal contempt of an order by the judge, John Sprizzo of U.S. District Court in Manhattan.

But the judge, invoking a 1970 Supreme Court decision in favor of a Vietnam War conscientious objector, said that the men had been acting on "sincere, genuine, objectively based" religious convictions. And since he was sitting as jury as well as judge in the October bench trial, he acquitted Bishop George E. Lynch and Brother Christopher Moscinski under a rarely exercised privilege that permits jurors to vote in defiance of a law if they believe it is wrong, the Times said.

As word of the acquittal spread, abortion-rights supporters reacted with alarm.

'It's an off-the-wall, scary decision," Donna Lieberman, director of the Reproductive Rights Project of the New York Civil Liberties Union, told the Times.

"It's so close to the Atlanta bombings and practically on the anniversary of the Brookline attacks," she said, referring first to the bombing of a clinic last week, then to shootings on Dec. 30, 1994, at a Massachusetts clinic.

The case was the first effort by Mary Jo White, the U.S. attorney for the Southern District, to enforce the Freedom of Access to Clinic Entrances Act, known as FACE, which has been credited with the significant drop in violence at clinics. Although there have been several constitutional challenges to the law, federal appeals courts have upheld it. And the Supreme Court, the Times said, has so far declined to examine it.

Red Rose Rescue Invasion Chronology

The anti-choice group, Red Rose Rescue, conducts clinic invasions where affiliated individuals gain access to reproductive health care facilities, attempt to intimidate patients and staff with anti-choice rhetoric, and refuse to leave the property. The first invasions by this group were coordinated to take place on the morning of September 15, 2017 and have continued through 2020. During the invasions, it is common for additional anti-choice individuals to remain outside to hold anti-choice signs, attempt to speak with patients entering the facility, and record any arrests that take place.

--

Date: September 15, 2017

Location(s): Sterling Heights, MI; Albuquerque, NM; Alexandria, VA

Description: Three coordinated clinic invasions were planned at Alexandria [redacted] in Sterling Heights, and University of New Mexico [redacted]. At these clinics, anti-choice individuals entered, or attempted to enter, the facilities, attempted to intimidate patients and staff with anti-choice rhetoric, and refused to leave the property. These individuals in two of the locations, VA and MI, refused to leave and were subsequently arrested by local police.

At Alexandria [redacted] in Alexandria, VA, Joan Andrew Bell, [redacted], Christopher "Fidelis" Moscinski, and [redacted] were arrested during the invasion. Lauren Handy participated but was not arrested.

At [redacted] in Sterling Heights, MI, [redacted], William Louis Goodman, [redacted], and [redacted] were arrested during the invasion.

Two unknown individuals entered the University of New Mexico [redacted] clinic in Albuquerque, NM, but left when the police were called. No arrests were made.

--

Date: December 2, 2017

Location(s): Washington, DC; West Bloomfield, MI; Alexandria, VA

Description: Three coordinated clinic invasions were planned at Alexandria [redacted], and [redacted]. Individuals at all three of the locations gained access to the facilities, attempted to intimidate patients and staff with anti-choice rhetoric, refused to leave the property, and were arrested by police.

At Alexandria [redacted] in Alexandria, VA, Lauren Handy, [redacted], and [redacted] were arrested. [redacted], and Jonathan Darnell participated but were not arrested.

At [redacted] in Washington, DC, Joan Andrews Bell, [redacted], and Christopher "Fidelis" Moscinski participated in the invasion. [redacted] and [redacted] were arrested. Other arrests are unknown.

At [redacted] in West Bloomfield, MI, [redacted], William Louis Goodman, [redacted], and [redacted] during the invasion. [redacted], [redacted], [redacted], [redacted], and [redacted] participated, but were not arrested.

--

Date: May 26, 2018

Location(s): Washington, DC

Description: Lauren Handy, [redacted] ("[redacted]"), and Christopher "Fidelis" Moscinski entered the [redacted] facility, attempted to intimidate patients and staff with anti-choice rhetoric, refused to leave the property, and were arrested and removed by law enforcement.

--

Date: July 24, 2018

Location(s): Washington, DC

Description: William Louis Goodman, [redacted] ("[redacted]"), Christopher "Fidelis" Moscinski, and [redacted] entered [redacted] in Washington, DC, attempted to intimidate patients and staff with anti-choice rhetoric, refused to leave the property, and were arrested and removed by law enforcement. Joan Andrews Bell, [redacted], Lauren Handy, [redacted], [redacted], [redacted], [redacted], and [redacted] participated but were not arrested.

--

Date: September 29, 2018

Location(s): Montclair, NJ

Description: [redacted], [redacted] Will Goodman, [redacted], [redacted] ("[redacted]"), Christopher "Fidelis" Moscinski, and [redacted] invaded [redacted] in Montclair, NJ, attempted to intimidate patients and staff with anti-choice rhetoric, refused to leave, and were arrested and removed by law enforcement. [redacted] participated but was not arrested.

--

Date: December 20, 2018

Location(s): Washington, DC; Trenton, NJ

Description: Two coordinated clinic invasions were planned at [redacted] and [redacted].

At [redacted] in Washington, DC, [redacted], [redacted], and [redacted] entered the facility, attempted to intimidate patients and staff with anti-choice rhetoric, refused to leave, and were arrested and removed by law enforcement. [redacted], [redacted], [redacted]

[redacted], [redacted], [redacted], and [redacted] participated but were not arrested.

At the [redacted] in Trenton, NJ, [redacted], William Goodman, Christopher "Fidelis" Moscinski, and [redacted] entered the facility, attempted to intimidate patients with anti-choice rhetoric, refused to leave, and were arrested by police.

--

Date: March 19, 2019

Location(s): Washington, DC

Description: Two coordinated clinic invasions were planned at [redacted] and [redacted], both in Washington, DC.

At [redacted], five individuals attempted to enter the clinic inside a multi-office medical building but were denied entry. They refused to leave the hallway outside the entrance to the clinic. Lauren Handy, [redacted], and [redacted] were arrested and removed by law enforcement. Joan Andrews Bell, Jonathan Darnell, [redacted], [redacted], and [redacted] participated but were not arrested.

At [redacted], [redacted], William Goodman, Christopher "Fidelis" Moscinski, and [redacted] were arrested during the invasion. [redacted], also known as "[redacted]" or "[redacted]", participated but left before she could be arrested.

--

Date: April 17, 2019

Location(s): Vancouver, BC

Description: [redacted] and [redacted], also known as "[redacted]", entered [redacted] in Vancouver, BC by following a patient into the waiting room. Both individuals refused to leave. [redacted] was walked out of the clinic by law enforcement but was not arrested. [redacted]

--

Date: June 7, 2019

Location(s): Flint, MI

Description: Seven anti-choice extremists entered [redacted] in Flint, MI at 8:30AM and posed as patients, while trying to counsel women by singing and handing out fliers. [redacted], "[redacted]", and another unknown individual left the clinic before the cops arrived and were not arrested. [redacted], William Goodman, Lauren Handy, and [redacted] were arrested; removed from the clinic by law enforcement; and charged with [redacted]. The pre-trial hearing is scheduled for Monday, August 24, 2020.

--

Date: July 13, 2019

Location(s): Morristown, NJ

Description: Will Goodman, [redacted], also known as "[redacted]", Christopher "Fidelis" Moscinski, and [redacted] entered the [redacted], attempted to intimidate patients and staff with anti-choice rhetoric, refused to leave, and were arrested. [redacted], [redacted], [redacted], and [redacted] participated but were not arrested.

--

Date: September 5, 2019

Location(s): Houston, TX

Description: Several anti-choice individuals who have previously been involved with clinic invasions entered the [redacted] in Houston, TX, attempted to intimidate patients and staff with anti-choice rhetoric, and left the property before the police arrived. They called this a "Window of Opportunity Rescue". After they left, they attempted to enter another nearby facility, [redacted], [redacted] made a fake appointment to gain access to the facility; however, staff identified [redacted] and her mother, [redacted], as anti-choice protesters and asked them to leave the clinic. No arrests were made.

Joan Andrews-Bell, [redacted], Jonathan Darnel, Will Goodman, Lauren Handy, [redacted], [redacted], and [redacted] participated.

--

Date: January 18, 2020

Location(s): Plainfield, NJ

Description: Five anti-choice individuals entered the [redacted] in Plainfield, NJ, attempted to intimidate patients and staff with anti-choice rhetoric, and refused to leave the property. [redacted] left and was not arrested. Police arrested Joan Andrews Bell, [redacted], William Goodman, and Christopher "Fidelis" Moscinski and removed them from the building.

--

Date: April 30, 2020

Location(s): Baton Rouge, LA

Description: William Goodman and [redacted] entered the [redacted] in Baton Rouge, LA, attempted to intimidate patients and staff with anti-choice rhetoric, refused to leave the property, and were arrested and removed by law enforcement.

--

Date: May 13, 2020

Location(s): Grand Rapids, MI

Description: Several individuals tried to gain access to the waiting room of [redacted] in Grand Rapids, MI, but were identified as anti-choice protesters and denied entrance by clinic staff.

--

Date: May 14, 2020

Location(s): Washington, DC

Description: Two coordinated clinic invasions were planned at [redacted] and [redacted], both in Washington, DC.

At [redacted], [redacted] and [redacted] entered the multi-unit building. They were unable to enter the waiting room of the clinic but stood in the hallway outside the door to the facility, attempted to intimidate patients and staff with anti-choice rhetoric, refused to leave, and were arrested. Jonathan Darnel, [redacted], and [redacted] entered the lobby of the building, but left before they could be arrested. [redacted] also participated but was not arrested.

At [redacted], William Goodman, [redacted], and Christopher "Fidelis" Moscinski attempted to enter the facility in the morning. In the afternoon, Jonathan Darnel entered the clinic's waiting room, attempted to intimidate patients and staff with anti-choice rhetoric, and refused to leave the property.

http://leaderu.com/ftissues/ft9706/mcconnell.html

First Things

Breaking the Law, Bending the Law

Michael W. McConnell

Copyright (c) 1997 First Things 74 (June/July 1997): 13-15.

Federal Judge John E. Sprizzo will never again be promoted or advanced, for he has committed an unpardonable act of courage in defense of conscience. On January 13, 1997, in the U.S. District Court in Manhattan, Judge Sprizzo acquitted an elderly bishop and a young priest of the crime of "quietly praying with rosary beads" in the driveway of an abortion clinic, in violation of a court injunction and the Federal Access to Clinic Entrances Act.

His reasons? That these two offenders did not act with "bad purpose" and, even if they did, he would exercise a judicial version of jury nullification. Because their act was "purely passive"—meaning nonviolent—and "so minimally obstructive," it justified "the exercise of the prerogative of leniency." Because the parties waived a jury trial, the judge's decision is equivalent to a jury verdict of acquittal, and cannot be appealed.

As a matter of law Judge Sprizzo was probably wrong. There can be little doubt that the two defendants, Bishop George E. Lynch and Brother Christopher Moscinski, violated the injunction and the Clinic Access law "willfully." They knew exactly what they were doing and why they were doing it. And there is no precedent in our law for a judge to exercise the prerogative of jury nullification. Juries can acquit for any reason or no reason at all, and can use that power to acquit guilty parties out of sympathy for the defendant or opposition to the law. A judge, by contrast, must act within the bounds of the law by which he holds office. Every decision a judge makes must be grounded in law.

This case has the unusual twist that Judge Sprizzo himself had issued the underlying injunction. Usually that makes a judge especially inclined to punish infractions, which are not just "contempt of court" but contempt of *his* court. Lawyers for the defendants argued that a judge is entitled to overlook violations of his own injunction. Maybe that is right. But the argument seems to suggest that contempt sanctions are imposed for the purpose of vindicating the personal authority of the judge. To my mind, that contradicts the very idea of injunctions as law. If the underlying injunction is lawful, the judge's duty to enforce it should not be affected by the fact that he is the author.

If this is so, Judge Sprizzo should not have acquitted the defendants. If he wished to exercise the prerogative of leniency (as, under the circumstances, he should), he should have entered a judgment of conviction and imposed a suspended sentence.

Yet one cannot help admiring the judge's act. It will mark Judge Sprizzo for the rest of his career. He must have known that he would be excoriated by the newspapers and treated as a pariah by the "moderate" voices of his community for giving moral succor to "anti-abortion extremists."

After reading Judge Sprizzo's opinion, I was driven to reread Dr. Martin Luther King, Jr.'s great *Letter from the Birmingham Jail*, addressed to the "moderate" clergy of his day. Dr. King, like Bishop Lynch and Brother Moscinski, had been enjoined by court order not to engage in a demonstration that, according to the authorities, would impede members of the public from access to lawful businesses and activities. King—like Lynch and Moscinski—believed that it was wrong to prevent citizens from engaging in nonviolent direct action to protest injustice, and King—like Lynch and Moscinski—thought that the underlying law enforced by the injunction was unconstitutional.

King was prosecuted by the state of Alabama and convicted for violating the injunction. He was sentenced to five days in jail. The United States government, prosecuting Lynch and Moscinski, sought a punishment of up to six months' imprisonment. Not even Bull Connor had asked for that. But in Lynch and Moscinski's case, the judge refused to be a party to the effort to silence the protest. "Were a person to have violated a court order directing the return of a runaway slave when Dred Scott was the law," the judge asked, "would a genuinely held belief that a slave was a human person and not an article of property be a matter the court could not consider in deciding whether that person was guilty of a criminal contempt charge?"

Perhaps most strikingly parallel was King's conviction—shared by Lynch and Moscinski—that there is a profound difference between peaceful, nonviolent protest and violence. In King's *Letter*, he contrasted his philosophy of nonviolence with the "force . . . of bitterness and hatred" of certain "black nationalist groups," which "comes perilously close to advocating violence."

Of course, King's opponents did not see it that way. The lawyers for segregation who sought and obtained an injunction against King's Birmingham protests cited the danger of "mob violence" and the violation of "numerous ordinances and statutes of the city of Birmingham." It was they who blurred the distinction between violent and nonviolent protest, using the possibility of the former as an excuse for blocking the latter.

Nor do Lynch and Moscinski's opponents see it that way. "It's an off-the-wall, scary decision," an abortion-rights lawyer told the *New York Times*. "It's so close to the Atlanta bombings and practically on the anniversary of the Brookline attacks," she said. "People will take it to the next level and then the next and they end up getting violent," another abortion-rights advocate said.

If quietly praying the rosary in the driveway of an abortion clinic is "close" to bombings, then Dr. King's nonviolent march was no less close to "mob violence."

The legislative history of the Federal Access to Clinic Entrances Act is filled with lurid examples of abortion-clinic violence, but there was no need for legislation against violence. Violence was already illegal. The innovation of the Clinic Access statute was to impose extreme sanctions—half a year in prison for a single offense—for peaceful, nonviolent acts of protest, without proof of injury to anyone, if they have the effect of "obstructing" access to the clinic. That can mean quietly praying on the steps.

The *New York Times* article on Judge Sprizzo's decision stated that the Clinic Access statute is "credited with the significant drop in violence at clinics." It does not point out that the statute is also credited with a significant drop in lawful, nonviolent protests. The penalties are so harsh, the terms so vague, and the coverage so sweeping that the statute frightens off lawful as well as unlawful protest. That presumably was its unstated purpose.

Dr. King reportedly agonized over the decision to violate the Birmingham injunction. He was committed to the rule of law (after all, he was demanding that southern officials comply with court injunctions mandating desegregation) and he did not wish the civil rights movement to be tarred with the brush of illegality. But in two previous protests, compliance with injunctions had doomed the movement to failure. No doubt, newspapers credited those injunctions with a significant drop in violence, but they also brought about a significant drop in effective protest.

In the most famous section of the *Letter*, Dr. King distinguished between "two types of laws: just and unjust. I would be the first to advocate obeying just laws. One has not only a legal but a moral responsibility to disobey unjust laws." He went on to explain: "An individual who breaks a law that conscience tells him is unjust, and who willingly accepts the penalty of imprisonment in order to arouse the conscience of the community over its injustice, is in reality expressing the highest respect for law."

Perhaps that is what Judge Sprizzo meant when he held that Lynch and Moscinski lacked the "bad purpose" necessary to justify conviction for criminal contempt. In a sense, they—like King—were expressing the "highest respect" for the law: they assumed that the law is capable of reform. But King specified that the conscientious offender must be willing to accept the penalty. Acceptance of the penalty of imprisonment, King said, will "arouse the conscience of the community over its injustice."

It seems unlikely that imprisonment of Bishop Lynch and Brother Moscinski would arouse the conscience of our community over roughly one and a half million abortions each year. Unlike King, Lynch and Moscinski face the hostility of most newspapers and elite institutions, and their cause is regarded by the Supreme Court of the United States as an affront to its authority. They would probably languish, unnoticed, in prison.

But then, in 1963 Dr. King and his cause did not enjoy the support they have received in hindsight. While King was in the Birmingham jail, *Time* magazine and the *New York Times* editorialized against the demonstrations, and the Supreme Court's eventual decision upholding his imprisonment is told entirely from the point of view of the Birmingham authorities. If it had not been for Bull Connor's decision to turn water

cannons and dogs loose on demonstrating children, it is possible that King's imprisonment, too, would have gone unnoticed.

Judge Sprizzo spared Lynch and Moscinski the indignity of jail. Unlike King, Lynch and Moscinski will not have the chance to write a *Letter from the Manhattan Jail*, calling their fellow clergy to task for their silence, and worse, on the practice of abortion. I am not sure the judge's acquittal was wise, and I am quite sure it was not lawful. It cannot be true that individuals may violate court orders with impunity whenever they sincerely believe those orders are morally wrong. And it would be utterly unacceptable to allow such violations only, but whenever, the judge happened to agree with the violator. Over a decade ago, a federal judge released two "peace" protestors who broke into a Honeywell defense plant, smashed the computer system, and poured blood over the wreckage of the computer. The judge called the vandals "friends of the people" and the victims "warmongers." Those who think that decision was wrong must also have their doubts about Judge Sprizzo's ruling.

But there is one big difference between the cases. The perpetrators of the Honeywell break-in were prosecuted for their acts, not for their motives. The punishment sought by the prosecutor was no different from what it would have been if they had vandalized the Honeywell computers out of malicious mischief, or committed a similar act for different motives at a different kind of facility.

It is utterly incredible that Lynch and Moscinski might be sent to prison for six months for praying in a driveway. If they had been in that driveway for some other reason (a labor dispute, for example), or if they had committed the same sort of protest at another kind of business (a fur store, for example, or a CIA recruiting office), they would have gotten off with a slap on the wrist, had they been punished at all.

The Federal Access to Clinic Entrances Act singles out a particular kind of protest for penalties unheard-of in the history of American political protest movements. Lynch and Moscinski were not tried for the actual harm they caused. As Judge Sprizzo noted, the "obstructive" effect of their quiet protest was "minimal." The prosecutor who sought to imprison Lynch and Moscinski was not asking for impartial justice, but for repression of political dissent.

Lynch and Moscinski should have been punished for the acts they committed. They should not have been spared because their cause was just. But they also should not be punished *more severely* because their cause is unpopular. They should have been charged with trespassing on private property, and given the same punishment that is meted out to others who commit that offense in that jurisdiction with comparable damage. I'd guess a fifty-dollar fine would be about right.

FACE Suit Brought Against Catholic Bishop

A suit was filed against two men, retired Catholic Bishop George Lynch and Christopher Moscinski, charging them with violating the Freedom of Access to Clinic Entrances Act (FACE). In May, 1995, the two men were arrested for blocking the driveway of the Women's Medical Pavilion in Dobbs Ferry, New York.

The suit, filed by U.S. Attorney Mary Jo White, seeks $30 damages and a court order to prohibit both men from blocking the clinic entrance.

According to a *New York Times* report, there have been over one thousand arrests at that clinic since 1988.

October 30, 1995

http://www.nyclu.org/rrp_courts.html#Lynch

United States v. Lynch and Moscinski (U.S. Court of Appeals, Second Circuit, Docket No. 97-1092) (*amicus*)

In February, 1996, the United States Attorney for the Southern District of New York sought and obtained an injunction pursuant to the Freedom of Clinic Entrances Act ("FACE") prohibiting anti-choice protestors from impeding or obstructing access to an abortion clinic in Dobbs Ferry, New York. Several months later, District Court Judge John Sprizzo, the judge who issued the injunction, held two anti-choice protestors, George Lynch and Christopher Moscinski, in civil contempt for violating the injunction.

In a January 1997 decision, however, Judge Sprizzo dismissed the criminal contempt charges against the defendants. Judge Sprizzo reasoned that the defendants did not possess the willfulness necessary for criminal contempt because they acted on the basis of their sincerely held religious beliefs. In so holding, Judge Sprizzo analogized the anti-choice protestors' actions to those of conscientious objectors. The Court also went on to hold that even if the defendants' actions indicated guilt, the court was entitled to exercise the prerogative of jury nullification, whereby a fact-finder can refuse to acquit even when the facts indicate guilt.

Judge Sprizzo's decision directly contravenes the determination by both Congress and the United States Supreme Court that the grave threats to women's access to reproductive health care warrant extra protective measures. The reasoning of the decision is virtually unprecedented. The numerous federal and state courts to consider this issue have rejected the argument that a sincerely held religious belief can negate criminal willfulness. The sole exception, a decision from a lower New York State court, is based upon a misapprehension of the abortion case law.

In response to this decision, the United States Attorney is appealing the decision to the Second Circuit. In conjunction with the NOW Legal Defense and Education Fund, the NYCLU Reproductive Rights Project o rganized an *amicus* effort. Four organizations signed onto the NYCLU's brief: the American Jewish Congress, Lambda Legal Defense and Education Fund, the Westchester Coalition for Legal Abortion, and the National Emergency Civil Liberties Committee. The brief argues first that principles of double jeopardy bar the appeal. It then states that if, however, the Court feels constrained to address the merits of the appeal, then Judge Sprizzo's decision should be reversed for the reasons discussed above. STATUS: An argument in the Second Circuit has not yet been set. (Yueh-ru Chu; Donna Lieberman)

Update: The U.S. Court of Appeals concurred with our analysis and denied the rehearing because of the principle of double jeopardy, while simultaneously striking down the lower court's reasoning. Donna Lieberman, RRP Director, said that "the message is clear to other judges and courts around the country that there is no religious exception in the case of abortion-related criminal cases." March, 2000

EXHIBIT 050

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "McNally, James (USADC)" <[redacted]>
Subject: RE: Red Rose Rescue Info Requested
Date: Mon, 14 Sep 2020 10:53:24 -0400
Importance: Normal
Attachments: 1997-Moscinski_C-Art.pdf; 201905-RWW-RRR_Art.pdf; 19951031-Moscinski_C-Art.pdf; 19970120-Moscinski_C-Art.pdf; Handy-Statements.docx; [redacted]; Red_Rose_Rescue-Chronology.docx
Inline-Images: image001.gif

Hi, Jim–

Thanks again for taking time to chat about your pending cases, and sharing the related reports and body cam footage. Can you also look into getting the related reports from the closed/disposed-of cases?

The applicable statute I mentioned is 18 USC 248(a)(1) (FACE Act). I believe that we would be considering the "physical obstruction" aspect of the statute.

The 11th Cir. has a pattern instruction for this offense, but it does not capture the "attempt," where the defendants' conduct did not successfully prevent any person from providing or receiving health care services (I'm sure we can craft something better).
https://www.ca11.uscourts.gov/sites/default/files/courtdocs/clk/FormCriminalPatternJuryInstruction.pdf

In addition to this email string that provides the case info for your pending matters, I've attached the related documents received from NAF.

Thanks.
Sanjay

From: McNally, James (USADC)
Sent: Thursday, September 10, 2020 3:01 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Sanjay – I'm free all day tomorrow and anytime next week will be OK. My number is [redacted]

Jim

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Thursday, September 10, 2020 2:57 PM
To: McNally, James (USADC) <[redacted]>
Cc: Cooney, Joseph (USADC) <[redacted]>; Willoughby Jr., Charles (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Thank you, Chip and J.P.
Jim – it would probably be best if we have a call about your active cases. Do you have time for a call tomorrow or next week?
Sanjay

From: McNally, James (USADC)
Sent: Thursday, September 10, 2020 2:24 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Cooney, Joseph (USADC) <[redacted]>; Willoughby Jr., Charles (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Mr. Patel,

I have the active [redacted], Moscinski, and [redacted] cases. What do you need?

Jim McNally

From: Willoughby Jr., Charles (USADC) <[redacted]>
Sent: Thursday, September 10, 2020 2:18 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Cooney, Joseph (USADC) <[redacted]>; McNally, James (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Good afternoon Sanjay,

Please forgive my delayed response. I told J.P. I would get this to the both of you last week and got a bit tied up. Per your inquiries, the following cases have been disposed of by conviction or dismissal and are likely among our closed case files, which we do not have access to at this time:

Lauren Handy ([redacted]) and [redacted] ([redacted]) were assigned to former SAUSA Kathryn Schmidt. The cases were dismissed for want of prosecution on 7/23/19.

[redacted] was assigned to former SAUSA Sarah Harper. The defendant was sentenced [redacted]

Christopher Moscinski ([redacted]) was assigned to former SAUSA Kathryn Schmidt. The case was dismissed for want of prosecution on 9/19/19.

Christopher Moscinski ([redacted]) was assigned to former SAUSA Danielle Rosborough. The case was dismissed for want of prosecution on 10/11/18.

The following cases are still active and are currently assigned to SAUSA Jim McNally, who I've copied here.

[redacted] ([redacted])
[redacted] ([redacted])
Christopher Moscinski ([redacted])
William Goodman ([redacted])

Please let me know if you have any questions and/or need anything else from me.

Thanks,

Chip

From: Cooney, Joseph (USADC) <[redacted]>
Sent: Thursday, September 10, 2020 1:31 PM
To: Patel, Sanjay (CRT) <[redacted]>

Cc: Willoughby Jr., Charles (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Thanks for the ping, Sanjay.

Chip, circling back to this – can you help us get access to the underlying case files/AUSAs?

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Thursday, September 10, 2020 12:19 PM
To: Cooney, Joseph (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Hi, J.P.,
Just following up on the potential DC FACE matters I had emailed you about.
Assuming these defendants have active cases in superior court, can you have the assigned AUSA(s) reach out to me?
Thanks.
Sanjay

From: Cooney, Joseph (USADC)
Sent: Tuesday, September 1, 2020 1:41 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Thanks for this, Sanjay. I'm reaching out to my counterpart in Superior Court to find out where these are and will get you in touch. If we can take any of these federally under the FACE Act, we're all in help out.

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Tuesday, September 1, 2020 12:01 PM
To: Cooney, Joseph (USADC) <[redacted]>
Subject: FW: Red Rose Rescue Info Requested

Hi, J.P. –
Several pro-choice NGOs routinely reach out to me concerning possible FACE Act violations (18 USC 248(a)) that occur around the country.
Recently, in DC, there were MPD arrests related to conduct that occurred at local reproductive health clinics.
Below is case related information for some activists whom I've been monitoring over the past few years.
I believe that these cases are active in superior court.
If they are, can you connect me with the AUSA(s) handling these capers?
(I'm not sure whether the numbers below are case numbers, report numbers, or something else?)

Lauren Handy, [redacted], File Date 3/20/19
[redacted], [redacted], File Date 8/18/2020
([redacted], [redacted])
[redacted], [redacted], File Date 8/18/2020
Christopher Moscinski, [redacted], File Date 8/12/2020
([redacted], [redacted])
William Goodman, [redacted], File Date 8/12/2020

I'd like to take a look at the related reports.
I believe that at least two of these defendants have prior misdemeanor FACE Act convictions.
If any of these DC cases are potential FACE Act violations, then we may be able to charge those as a felony (sect 248(b)(2)).

Thanks.
Sanjay

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Thursday, August 20, 2020 4:27 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon [redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Re: Red Rose Rescue Info Requested

Here they are, Sanjay. Sent this morning.

From: Michelle Davidson
Sent: Tuesday, August 18, 2020 7:39:57 PM
To: [redacted]>
Cc: Tara Gannon [redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Red Rose Rescue Info Requested

Hi Sanjay,

Feel free to share this with Aaron as well. He replied to my previous email wanting to know if any action from Handy occurs. It might be useful for him to have the timeline as well. I also attached some articles on Moscinski that go pretty far back. Let me know if you need anything else. I'll definitely keep you posted if we hear of any attempts at clinics right away.

Case Numbers:
Lauren Handy, [redacted], File Date 3/20/19
[redacted], File Date 8/18/2020
([redacted])
[redacted], File Date 8/18/2020
Christopher Moscinski, [redacted], File Date 8/12/2020
([redacted])
William Goodman, [redacted], File Date 8/12/2020

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C: [redacted]



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 051

From: "[redacted] (WF) (FBI)"t[redacted]
To: "Gaston, Molly (USADC)" [redacted], "Patel, Sanjay (CRT)" [redacted], "Lauderdale, Jonathan (MPD)" [redacted], "[redacted] (WF)(FBI)" [redacted]
Subject: RE: [EXTERNAL EMAIL] - Lauren Handyt- FYI
Date: Tue, 29 Dec 2020 14:51:52 -0500
Importance: Normal
Inline-Images: image001.png

Thank you sir! Appears to all be 1st Amendment protected activity, so Im being mindful of that, but figured it made sense to pass along the email.

-

On Dec 29, 2020 14:48, "Lauderdale, Jonathan (MPD)" [redacted] wrote:
No problem.

I am about to leave for the day, on time for once but I checked our Cobalt database and so far I do not see any new arrest involving her.

I can check later this evening from home to see if any new arrest for her show up.

Jonathan Lauderdale
Detective, Second District
Criminal Investigations Division
Metropolitan Police Department
[redacted]
Desk: [redacted]
Cellphone: [redacted]
[redacted]

"We are here to help."

From: [redacted] (WF) (FBI)"[redacted]
Sent: Tuesday, December 29, 2020 2:25 PM
To: [redacted] (WF) (FBI)[redacted]; Gaston, Molly (USADC) [redacted]; Patel, Sanjay (CRT)"[redacted]; Lauderdale, Jonathan (MPD) [redacted]
Subject: Fwd: [EXTERNAL EMAIL] - Lauren Handy"- FYI

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to [redacted] for additional analysis by OCTO Security Operations Center (SOC).

FYSA - reaching out to Michelle this afternoon.

Jonathant- can you keep an ear open in case Handy ends up in MPD custody again?

Thanks

[redacted]

-

---------- Forwarded message ----------
From: "[redacted] (WF) (FBI)" <[redacted]>
Date: Dec 29, 2020 14:17
Subject: Fwd: [EXTERNAL EMAIL] - Lauren Handy - FYI
To: "[redacted] (WF) (FBI)" <[redacted]>
Cc: "[redacted] (WF) (FBI)" <[redacted]>
[redacted]

See below on one of your 286 subjects.

I believe Handy was arrested at another clinic outside our AOR a month or so ago as well.

Would love to work with you guys on the case - any chance I could be added as co?

[redacted]

SA [redacted]
WFO:DT
[redacted]

---------- Forwarded message ----------
From: Michelle Davidson <[redacted]@prochoice.org>
Date: Dec 29, 2020 14:11
Subject: [EXTERNAL EMAIL] - Lauren Handyt- FYI
To: "[redacted] (WF) (FBI)" <[redacted]>,"[redacted] (WF) (FBI)" <[redacted]>,"[redacted] (WF) (FBI)" <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>,Emma Goldberg <[redacted]@prochoice.org>
Good Afternoon All,

Lauren Handy has posted on social media that she entered a clinic in VA this morning and that she was outside the PP in DC shortly after that. She may have plans to enter other facilities in the DMV and I wanted to give you a heads up. We are sending out a Member Alert shortly so providers in the area are aware. Let me know if you have any questions or if I can help with anything.

I hope you all had a restful holiday,

-Michelle

https://twitter.com/[redacted]
https://twitter.com/[redacted]

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C: [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

For the latest information on the District Government's response to COVID-19 (Coronavirus), please visit coronavirus.dc.gov.

EXHIBIT 052

From: "Patel, Sanjayi(CRT)" <[redacted]>
To: "Michelle Davidson" <[redacted]@prochoice.org>
Subject: RE: RRR - PA / OSA in MT
Date: Thu, 09 Sep 2021 16:31:20 -0400
Importance: Normal
Inline-Images: image003.jpg; image004.png

Hi, Michelle –
Do you have any info on Zastrow and Co's travel to Montana?

From: Michelle Davidson[redacted]@prochoice.org>
Sent: Tuesday, August 31, 2021 5:57 PM
To: Cowall, Laura (CRT) <[redacted]; Smith, Katelyn (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Subject: RRR - PA / OSA in MT

Hi All,

I wanted to make sure you were aware of the invasion that occurred on 8.27. I've attached our member alert as well as screenshots of FB posts. More fodder for fact that they plan to continue these. I recently got a call from [redacted], [redacted] Judicial Security Inspector with the Eastern District of Pennsylvania (USMS Philadelphia Office) and he wanted to get in touch with the FBI agent that would be assigned to this. Do you have a contact I can direct him to? Or you can certainly reach out. He said he got my alert forwarded to him and he wanted to make sure he was assisting as best he could.

We also have word that Cal Zastrow and a few others known to blockade clinics are in Montana. I would bet they might try to block a clinic this week so I'm reaching out to clinics and my few local PD contacts to see if I could bring some awareness. Any other contacts you can connect me to would be very helpful as well. Since I'm the lone sailor on this ship now, I can use all the help I can get!

Hope you all are doing well.

Stay safe,

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

naf

[redacted]
Direct line: [redacted]



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 053

From: "Patel, Sanjayt(CRT)" <[redacted]>
To: "Gilbert, Kathryn (CRT)" <[redacted]>
Subject: FW: FYSA- Handy, Lauren audio recording, and fake appointment script
Date: Fri, 03 Feb 2023 08:28:27 -0500
Importance: Normal
Attachments: Lauren_Handy_1192023_paau_planning_meeting.m4a; Re__Scripts_for_calls_email_Redacted.pdf; CallingAbortion_Business_.pdf
Inline-Images: image002.jpg

From: Eduardo Serrano <[redacted]@prochoice.org>
Sent: Tuesday, January 31, 2023 10:35 AM
To: Patel, Sanjay (CRT) <[redacted]>; Smith, Katelyn (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Cowall, Laura (CRT) <[redacted]>
Cc: Michelle Davidson <[redacted]@prochoice.org>; Robert Ledogar [redacted]@prochoice.org>; security <[redacted]@prochoice.org>
Subject: [EXTERNAL] FYSA- Handy, Lauren audio recording, and fake appointment script

Hello DOJ team,

Attached is an audio recording of Lauren Handy discussing how she planned three clinic invasions that were attempted on 1/21/2023. We were able to prevent these invasions and PAAU was met with a heavy police presence. I have also attached the email that was sent to me by Handy containing the script that is being used to interfere with people receiving reproductive healthcare by making fake appointments. These fake appointments are also used as an access tool for invasions. The link is to a google drive and all access to the drive is set to anonymous by PAAU. For your OPSEC I have downloaded the script and attached it to this email, so you do not have to access their drive.

Eduardo Serrano
Intelligence Analyst

pronouns
(He/Him)

NAF Security
[redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 054

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

REQUEST FOR INFORMATION

TO: Faiz Malek, Senior Director of Security and Equity

FROM: Christina Longoria, Regional Intelligence Analyst
Affiliate Regional Intelligence Program
Global Safety and Security, Intelligence and Investigations

SUBJECT: [redacted]

DATE: **August 27, 2021**

[redacted] is an active anti-abortion member who is most well-known for his extensive participation in invasions of reproductive health care facilities. These invasions – coined "Red Rose Rescues" by the organizers – involve no more than six people entering a health center and refusing to leave until they are forced to do so by law enforcement. These invasions effectively shut down health center operations.

[redacted] has been an anti-abortion protester for at least ten years. During protests at reproductive health centers in Minnesota, [redacted] was known to "bend the rules," such as using a ladder to peer over privacy fences. [redacted] is a devout Catholic. He expressed his vows to the Franciscan Brotherhood of Peace in October 2010 and is known as Brother [redacted], fbp[1]. Over the years, it appears he has loosened his affiliation with the brotherhood, as he has been observed less frequently in his robe during his opposition activities.

[redacted] was arrested during the first documented "Red Rose Rescue" invasion in September 2017. He has since been documented for his involvement in 19 incidents at multiple health centers, including 14 attempted or successful "Red Rose Rescues." [redacted] has participated in 40% of the documented 35 attempted/successful health center invasions.

[1] http://www.brothersofpeace.org/index.php/our-life/meet-the-brothers/40-franciscan-brothers-of-peace/our-life/meet-the-brothers/[redacted]

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

REQUEST FOR INFORMATION

Thus far, the majority of criminal penalties [redacted] has faced in connection with health center invasions have been limited to fines or community service. [redacted]

GSS assesses [redacted] is a core member of the "Red Rose Rescue" movement. He will continue to participate in invasions and non-violent actions unless faced with stiff legal penalties.

[redacted] resides in [redacted] with [redacted], but frequently travels in connection with "Red Rose Rescue."

[redacted] identifying information is as follows:

Name(s): [redacted]
AKA: [redacted]
DOB: [redacted]
Address: [redacted]
Social: https://www.facebook.com/[redacted]
https://www.facebook.com/[redacted]





SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

EXHIBIT 055

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

TO: Affiliate Security Leaders

FROM: PPFA Global Safety and Security, Intelligence and Investigations

SUBJECT: Overview of Emerging Trend: "Red Rose Rescues" and blockade tactics

DATE: July 14, 2019

Executive Summary: Global Safety and Security (GSS) assesses the "Red Rose Rescue" trespass-blockade tactics will expand as more opposition members see it as a viable and effective action against abortion providers. GSS further assesses the movement will likely grow and hold the potential to significantly disrupt Planned Parenthood operations unless significant judicial consequences are brought against participants.

Details: On May 13, 2017, opposition member [redacted] of Operation Save America (OSA) and 10 others, blocked the entrance of [redacted] Clinic in [redacted], Kentucky. [redacted] and followers were arrested, however, the blockade effectively shut down the clinic for the rest of the day.[1]

While a constant and effective tactic in the 1980's and part of the 1990's in closing health centers, these types of blockade/trespass tactics stopped upon the implementation of the 1994 Freedom of Access to Clinic Entrances Act (FACE Act) by the United States Department of Justice (US DOJ). The FACE Act authorizes the Attorney General to seek injunctive relief, statutory or compensatory damage, and civil penalties against individuals who engage in conduct that violates the act.[2]

"Red Rose Rescue" are trespassing tactics used by the anti-abortion movement designed to avoid federal FACE Act violations. Rescue participants enter a health center and refuse to leave eventually being arrested. Participants are careful not to block entrances or patients, thus avoiding FACE Act violations

The FACE Act creation brought severe criminal and civil penalties to opposition organizations and individuals bringing a halt to the tactic that had been so effective in shutting down health centers. However, Global Safety and Security (GSS) assesses the[redacted] incident sets a precedent where the blockade/trespass operations, have returned as an effective opposition tactic, specifically, the "Red Rose Rescues."

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

While the [redacted] incident was not officially a "Red Rose Rescue" tactic, it likely influenced "Rescue" participants who have since conducted over a dozen such operations resulting in arrests.

In previous "Red Rose Rescues", participants have entered health centers and refused to leave, resulting in a police response and eventual arrests of at least some of the participants who refused to leave. To date, none of the participants have engaged in aggressive behavior, damaged property or obstructed patients during the incidents, thus skirting the FACE Act violations.

GSS assesses the participants likely grow bolder with each incident where federal FACE Act violations are not instituted.

GSS has detected a "Red Rose Rescue" Facebook page where postings have asked for "volunteers" willing to be arrested.[3] The page lists the following description:

"A lifelong response to the abortion holocaust. We counter hate with love. We oppose violence with non-violence. We overcome death by personal solidarity"[4]

While a small core group are the leaders and organizers in the movement, GSS has noticed others joining the movement and assess they will likely recruit more individuals, thus expanding the use of the tactic.

In June 2019, GSS noted that [redacted], a leading member of the "Rescues" obtained a camping trailer where he indicated he will be traveling across the country involved in anti-abortion activities. GSS assesses this to mean expanding the "Rescues" to other parts of

History of Blockade Tactics

During the 1980's, Operation Rescue organized massive protests coordinated in several states resulting in the closing of numerous health centers from blockade tactics.

The amount of trespassers overwhelmed police who would make an arrest only to have several other protesters take the place of those removed. Health centers would be shut down for days as these tactics would be employed at a targeted health center for a week.

On October 29, 1988, Operation Rescue organized the "National Day of Rescue" where over 1,000 opposition members were arrested in 27 cities for blockades against abortion providers in a coordinated "Rescue" nationwide.



Operation Rescue activists being led away by police in Wichita's "Summer of Mercy" blockades

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

the country. [redacted] is a New Mexico resident, however most of the "Rescues" have occurred on or near the East coast. [redacted] new mobility will likely result in radicalization and recruitment of like-minded opposition members to participate in incidents nationwide.

Another participant in the "Rescues" has been Joan Andrews Bell. Bell is a long-time activist who has been instrumental in the radical element of the opposition movement. [redacted].[5] In 1997, Bell employed [redacted] as a volunteer at "Good Counsel Homes," a home for single mothers based in [redacted], New Jersey that Bell founded with her husband [redacted]. Kopp considered Bell one of the earliest inspirations in the movement.[6]



Joan Andrews Bell being arrested during abortion protest in 1990's

[redacted]

GSS assesses that the participants justify the risks of arrest based on light misdemeanor sentences that have been handed out in past. The fines and probation sentencing have done little to stop their enthusiasm for future direct action. Unless legal repercussions become more stringent, it is likely the movement will grow and expand nationwide. GSS further assesses that should this movement grow, it will have a direct impact on Planned Parenthood operations. While violence at these incidents is unlikely, health centers will be closed down as the action is taking place.

Intelligence Gaps in "Red Rose Rescue" Planning and Operations

Organizers of the "Rescues" do not divulge any information prior to the operations. Plans are made in secret and participants do not discuss future plans online. GSS assesses that the opposition does conduct pre-operational surveillance at targeted health centers and viability assessments are made on the scene. Should a health center appear to be a difficult location, other health centers are picked. Due to this operational

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

security, GSS cannot determine a future target and warn health center staff of potential "Rescue" operations without human intelligence (HUMINT).

GSS assesses the core group of organizers and participants to be:



The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

Recruitment and Retention

GSS assesses social media is used for recruitment purposes via Facebook page (https://www.facebook.com/[redacted]). During the operation, a participant often live streams a video on Facebook. These tactics are specifically used for recruiting new participants. "Red Rose Rescue" organizer [redacted] posted the following on the above Facebook page in May 2019:

> *Dear Supporters of Red Rose Rescue:*
>
> *Will you Participate in a Red Rose Rescue? -- Is God calling you to reach out to mothers in the waiting rooms of the killing centers-- to give them that last opportunity to choose life and offer them the help they need to choose life-- and to stay with the babies should they still go off to their executions?! There are currently Red Rose Rescues being planned across the nation. Join this Life-Affirming, Woman Affirming effort --and peacefully defend the Unborn who have no one to stand up for them! We need to sacrifice ourselves to end abortion! The Lord of Love calls us to lay down our lives for our neighbor, the helpless, the unwanted, the outcast! Now's the time!*
>
> *For information to heed the call to become a rescuer just send an email to [redacted] -- one of the co-founders of Red Rose Rescue*

While the majority of the participants are repeat offenders, GSS notes new members appear at "Rescues" and are subjected to arrest. "Rescue" members must recruit new members to participate in order to avoid stacked arrests that may result in harsher sentences for repeat offenders. "Rescue' activist must spread out their arrests in between court appearances and new operatives are the only way to avoid those sentences.

Analyst Note: *During a July 13, 2019, Operation Save America meeting in Milwaukee, leader [redacted] asked who in the audience has been arrested before for "Rescues" and encouraged the youth in attendance to learn from those previously*

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

arrested. [redacted] *added: "praying is not enough, and sacrifices must be made."*[9] *While* [redacted] *is not official part of the Red Rose Rescue team, GSS assesses he strongly agrees with the tactic and will likely be a recruiter for future "Rescues".*

The following incidents represent recent organized trespass/blockades to include "Red Rose Rescues." Unless noted, all of the below participants were arrested. **The organizers are in bold font**.

May 13, 2017: [redacted], [redacted], KY

[redacted]
Eva Ed
Eva Zastrow
James Zastrow
Dennis Green
[redacted]
Unidentified juvenile

September 15, 2017: [redacted], [redacted], MI

[redacted]
William Goodman
[redacted]

September 15, 2017: [redacted], [redacted] VA

[redacted]
Fidelis Moscinski
Joan Andrews Bell
[redacted]

September 15, 2017: [redacted]
[redacted], NM

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

(No arrests made)
[redacted]

Analyst Note: *The above events that took place on September 15th were coordinated* ***nationwide.***

December 2, 2017: [redacted], [redacted] **DC**
[redacted]

December 2, 2017: [redacted], [redacted], **VA**
Lauren Handy
[redacted]

December 2, 2017: [redacted], [redacted], **MI**
[redacted]
Will Goodman
[redacted]

The following participated but were not arrested:
[redacted]

May 26, 2018: [redacted], [redacted] **DC**
Lauren Handy
Fidelis Moscinski
[redacted]
Unknown individual

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

July 24, 2018: [redacted], [redacted] DC

Fidelis Moscinski
[redacted]
Will Goodman

The following participated but were not arrested:
Lauren Handy
[redacted]
Joan Andrews Bell
[redacted]
Jane Doe (unidentified female, likely [redacted])

September 29, 2018: [redacted], [redacted], NJ

Fidelis Moscinski
Will Goodman
[redacted]
Jane Doe (unidentified female)

Analyst Note: *It is not known who organized this event.*

December 20, 2018: [redacted], [redacted], DC

[redacted]

The following participated but were not arrested:
Jonathan Darnel
[redacted]

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

[redacted]

December 22, 2018: [redacted], Planned Parenthood [redacted], NJ

Fidelis Moscinski

[redacted]

The following participated but were not arrested:
Joan Andrews Bell
[redacted]
Will Goodman
[redacted]

March 19, 2019: [redacted], [redacted], DC

[redacted]

Lauren Handy

[redacted]

March 19, 2019: [redacted], [redacted] DC

Fidelis Moscinski
Will Goodman

[redacted]

Analyst Note: *The above events that took place on March 19th were coordinated nationwide.*

June 7, 2019: [redacted], [redacted], MI

[redacted]

Will Goodman

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Lauren Handy

The following participated but were not arrested:
[redacted]

July 13, 2019: [redacted], NY
Jane Doe, (unidentified female, likely [redacted])
Will Goodman
[redacted]
Fidelis Moscinski

Analyst Note: *Other members outside but not involved or identified. It Is not clear who organized this event.*

Conclusion: *GSS assesses with high confidence that the "Red Rose Rescue" movement will expand as sympathetic opposition members will join the group as publicity increases. Father* [redacted] *travel nationwide will likely recruit new members. Furthermore, the social media coverage of these "Rescues" including Facebook Live videos will likely influence future opposition members looking for a more aggressive tactic of protesting abortion. Ultimately, these actions will have a direct effect on Planned Parenthood operations should the "Rescue" movement target large number of Planned Parenthood health centers in the future.*

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

END NOTES

[1] AP News, "US abortion clinics face surge of trespassing and blockades;" David Crary; dated May 7, 20
[2] Freedom of Access to Clinic Entrances Act (FACE), 18 U.S.C. § 248; https://www.justice.gov/crt-12; US DOJ online description of FACE Act.
[3] https://www.facebook.com/[redacted].
[4] Ibid
[5] "Targets of Hatred," by Patricia Baird Windle; 2001; see pages 296-297.
[6] Online Rewire article; https://rewire.news/article/2018/03/01/trespassing-trial-march-caught-attention-activists-sides-abortion-movement/; Sofia Resnick; dated March 1, 2018.
[7] Ibid.
[8] Red Rose Rescue Facebook page; dated May 24, 2019; posted by [redacted]; https://www.facebook.com/[redacted]
[9] [redacted] July 13, 2019 Facebook video by Operation Save America; https://www.facebook.com/[redacted]

This product was prepared by [redacted], Director of Intelligence and Investigations, Global Safety and Security. Comments and queries can be addressed to Director [redacted], at [redacted] or [redacted].

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

EXHIBIT 056

From: duVergne Gaines <[redacted]@feminist.org>
To: [redacted]
Cc: [redacted] <[redacted]@feminist.org>, [redacted] <[redacted]@feminist.org>
Subject: [EXTERNAL] Meeting Request, FACE Act Memo, and Cover letter
Date: Thu, 25 Aug 2022 21:33:51 -0400
Importance: Normal
Attachments: FMF_Cover_Letter_re_FACE_Memo_08.25.2022_(6)[1].pdf; FACE_Act_Outline_Memorandum_08.25.2022.pdf

---

Dear Ms. Cochran, Chief Felte, Chief Rosenbaum, Principal Deputy Chief Fitzgerald, Deputy Chief Cowall, Mr. Patel, and Ms. Saxe:

Attached please find a cover letter and accompanying legal memorandum urging the DOJ to pursue nationwide injunctive relief to prevent ongoing and future violations of the Freedom of Access to Clinic Entrances (FACE) Act. We welcome your assistance in ensuring these materials reach Assistant Attorney General Clarke, Attorney General Garland and Associate Attorney General Gupta.

Together with our colleagues at the National Abortion Federation, we would like to request a meeting with you, Attorney General Garland, Associate Attorney General Gupta, and Assistant Attorney General Clarke to discuss this letter, the attached memorandum, and the escalation in threats, harassment, and violence against reproductive health care providers and patient communities since the *Dobbs* decision.

We are grateful for your leadership and commitment to ensuring clinic, provider, and patient safety.

Thank you for your time and attention to these materials and to our request.

Best,

Eleanor Smeal, President,
Katherine Spillar, Executive Director,
and duVergne Gaines, Director, National Clinic Access Project
Feminist Majority Foundation
O: [redacted]
E: [redacted]@feminist.org

The information contained in this electronic message and any attached documents are privileged, confidential and protected from disclosure, and the information may not necessarily express the opinion of Feminist Majority Foundation. If you are not the intended recipient, note that any review, disclosure, copying, or dissemination of this message or any attachments is strictly prohibited. If you think that you have received this message in error, please destroy it and notify the sender.

EXHIBIT 057

CONFIDENTIAL TREATMENT REQUESTED
EXEMPT FROM FOIA

FEMINIST MAJORITY FOUNDATION

Working for Women's Equality

Eleanor Smeal
President

Peg Yorkin
Chair of the Board

Katherine Spillar
Executive Director





August 25, 2022

Hon. Merrick Garland, Attorney General of the United States
Hon. Vanita Gupta, Associate Attorney General of the United States
Hon. Kristen Clarke, Assistant Attorney General, Civil Rights Division
James Felte, Chief, Criminal Section, Civil Rights Division
Steven Rosenbaum, Chief, Special Litigation Section, Civil Rights Division
Laura Cowall, Deputy Chief, Special Litigation Section, Civil Rights Division
Paige Fitzgerald, Principal Deputy Chief, Criminal Section, Civil Rights Division
Sanjay Patel, Trial Attorney, Criminal Section, Civil Rights Division
Elizabeth Saxe, Trial Attorney, Special Litigation Section, Civil Rights Division
United States Department of Justice
950 Pennsylvania Ave., N.W.
Washington, D.C. 20530-0001

Dear Attorney General Garland, Associate Attorney General Gupta, Assistant Attorney General Clarke, Chief Felte, Chief Rosenbaum, Principal Deputy Chief Fitzgerald, Deputy Chief Cowall, Mr. Patel, and Ms. Saxe:

We write today to urge the Department of Justice (DOJ) to use the full measure of its investigative and prosecutorial power to protect reproductive health care providers and the communities they serve from anti-abortion violence and threats of violence in the wake of the Supreme Court's decision in *Dobbs v. Jackson Women's Health Organization* overturning *Roe v. Wade*. Specifically, as set forth in the attached legal memorandum, we urge DOJ to pursue nationwide injunctive relief to prevent ongoing and future violations of the Freedom of Access to Clinic Entrances ("FACE") Act.

Clinics, providers, and patients are facing an onslaught of threats, intimidation, and violence. As just one example, recently the Milwaukee-based anti-abortion extremist group Operation Save America (OSA) traveled to and targeted clinics in Nashville, Tennessee, as part of a week-long campaign to abolish abortion in that city. Over the course of several days in late July, OSA leaders and adherents—many of whom previously had targeted reproductive health clinics in other parts of the country—committed acts of trespass, intimidation, and clinic entrance obstruction; upon arrest, one individual – who attempted to enter two facilities that day– was carrying a concealed weapon. They have vowed to intensify their efforts in the coming weeks.[1]

Indeed, since the *Dobbs* ruling, anti-abortion extremists have engaged in seemingly relentless acts of violence, intimidation, and obstruction against clinics and providers:

[1] Mem. of Law in Support of Emergency Mot. For TRO at 1-2, *Femhealth USA, Inc., d/b/a Carafem v. Williams et al.*, No. 22-cv-00565 (M.D. Tn. July 29, 2022), ECF No. 3.

- On June 28, a bomb threat was called into a clinic in Victorville, California;[2]
- On July 7, three anti-abortion extremists invaded, disrupted and obstructed two clinics in Atlanta, Georgia and attempted to gain entry to a third while livestreaming the invasions;[3]
- Also on July 7, a member of the Red Rose Rescue anti-abortion extremist group blockaded a clinic in Hempstead, New York using bike locks and his body;[4]
- On July 13, six individuals associated with OSA blockaded a clinic in Grand Rapids, Michigan while co-conspirators livestreamed the blockade;[5]
- On July 14, three extremists invaded, disrupted and obstructed two additional clinics in Atlanta, Georgia;[6]
- On August 4, a man committed arson at a clinic in Kalamazoo, Michigan; [7]
- On August 18, three extremists invaded, disrupted, and obstructed two clinics in Brooklyn, NY[8]; and
- On August 23, a group of extremists involved in prior clinic blockades gathered in Michigan from across the country for three weeks to target – and possibly obstruct-- clinics throughout the state.[9]

In addition, leaders affiliated with the [redacted] movement in California, Washington, Florida, and Arizona have stated that abortion providers should be put

---

[2] *Planned Parenthood in Victorville Evacuated after Bomb Threat*, Victor Valley News Group (June 28, 2022), https://www.vvng.com/planned-parenthood-in-victorville-evacuated-after-bomb-threat/.

[3] Social media posts by Kingdom Conservative Party member and OSA associate Bevelyn Williams, Bevelyn Williams, *One Last Clinic, Hit 'Em Up!*, Facebook (July 7, 2022), https://fb.[redacted]; Bevelyn Williams, *By Faith we are Calling This Abortion Clinic, Portal of Demons Down*, Facebook (July 7, 2022), https://www.facebook.com/[redacted]; Bevelyn Williams, *Another Clinic, Planned Parenthood Will Fall!!*, Facebook (July 7, 2022), https://fb.watch/[redacted].

[4] *Pro-life Priest Arrested for Locking Planned Parenthood Entrance in Abortion 'Harbor' New York*, Life Site (July 7, 2022), https://www.lifesitenews.com/news/pro-life-priest-arrested-for-locking-planned-parenthood-entrance-in-abortion-harbor-new-york/.

[5] Michael Oszust and Kyle Mitchell, *6 Anti-Abortion Protesters Arrested at GR Reproductive Health Clinic*, Wood TV (July 13, 2022), https://www.woodtv.com/news/grand-rapids/6-anti-abortion-protesters-arrested-at-gr-reproductive-health-clinic/.

[6] Social media posts by Kingdom Conservative Party member and OSA associate Bevelyn Williams, Bevelyn Williams, *Another Day Another Abortion Clinic, That Must Come Down!!*, Facebook (July 14, 2022), https://fb.watch/eGAk846t_Fd/; Bevelyn Williams, *Another Day Another Abortion Clinic, That Must Come Down!! PT 2*, Facebook (July 14, 2022), https://fb.watch/cGAkRBS2px/.

[7] C. Ryan Barber, *A Michigan Man Who Referred to Abortion as "Genocide" was Charged with Setting Fire to a Planned Parenthood*, Business Insider (Aug. 4, 2022, 7:10 PM), https://www.businessinsider.com/planned-parenthood-fire-abortion-justice-department-arsen-charge-2022-8.

[8] Reported by the National Abortion Federation and per social media posts by Kingdom Conservative Party member and OSA associate Bevelyn Williams.

[9] Social media posts by OSA associate and clinic blockader Dennis Green (August 23, 2022), [redacted] and (August 10, 2022) [redacted].

to death or subject to the death penalty for their "crimes."[10] Individual members of the [redacted], a violent network of anti-abortion extremists, have also openly celebrated violence online and offered to share via Facebook newsletters describing how to bomb and burn clinics.[11] This escalating violence and harassment is generating tremendous fear among providers—especially regarding known extremists who repeatedly target clinics and staff with intimidating and disruptive invasions and flagrant blockades in city after city, state after state.

We appreciate President Biden's commitment to ensuring the safety and security of reproductive health care patients, providers, and third parties, as announced in the President's July 8, 2022 Executive Order Protecting Access to Reproductive Health Care Services.[12] We also are grateful for Attorney General Garland's acknowledgment of the gravity of the threats abortion providers face in the wake of the *Dobbs* decision,[13] and the commitment by Associate Attorney General Gupta, Assistant Attorney General Clarke, and the DOJ National Task Force on Violence Against Reproductive Health Care Providers to keeping essential reproductive health care accessible and providers and patients safe. As part of DOJ's efforts to prevent abortion-related violence, we encourage DOJ to seek nationwide injunctive relief under the FACE Act against extremist leaders and adherents who conspire to obstruct access to reproductive health services and harass and intimidate providers and patients. Such broad enforcement under the FACE Act can help prevent repeated violative behavior by these individuals and help keep clinics open and providers and patients safe—including those in Nashville, who weathered repeated coordinated disruptions and threats just weeks ago.

Furthermore, we urge DOJ to move quickly to pursue this relief. As the incidents described above demonstrate, the *Dobbs* ruling has only emboldened anti-abortion extremists.[14] These

---

[10] *In Wake of SCOTUS Decision, New IFB Pastors Call for Government to Execute Abortion Doctors*, ADL (July 1, 2022), https://www.adl.org/resources/blog/wake-scotus-decision-new-ifb-pastors-call-government-execute-abortion-doctors.

[11] Social Media posts by [redacted] member [redacted] (available upon request).

[12] Executive Order on Protecting Access to Reproductive Healthcare Services (July 8, 2022), https://www.whitehouse.gov/briefing-room/presidential-actions/2022/07/08/executive-order-on-protecting-access-to-reproductive-healthcare-services/.

[13] Press Release, U.S. Dep't of Justice, U.S. Attorney's Office, Attorney General Merrick B. Garland Statement on Supreme Court Ruling in Dobbs v. Jackson Women's Health Organization (June 24, 2022), https://www.justice.gov/opa/pr/attorney-general-merrick-b-garland-statement-supreme-court-ruling-dobbs-v-jackson-women-s.

[14] This is not to say that the months preceding the *Dobbs* ruling were devoid of incidents. To the contrary, during that time:

- a clinic in Knoxville, Tennessee was burned to the ground (Amanda Holpuch, *Arson Destroyed Knoxville Planned Parenthood Clinic, Officials Say*, New York Times (Jan. 7, 2022), https://www.nytimes.com/2022/01/07/us/knoxville-planned-parenthood-arson.html);
- a clinic in Fort Myers, Florida was blockaded (Michael Braun, *'Nasty and well-coordinated': Anti-abortion Protesters Arrested After Blocking Entry to Fort Myers Planned Parenthood*, News Press (Jan. 27, 2022), https://www.news-press.com/story/news/crime/2022/01/27/fort-myers-anti-abortion-protestors-arrested-planned-parenthood/9242982002/);
- a clinic located within the San Francisco General Hospital in San Francisco, California was invaded and vandalized and one of its physicians was stalked at her home (Gregory Yee, *L.A. Antiabortion Activist Charged with Harassing San Francisco Doctor, Defacing Statue*, LA Times

individuals are aggressively organizing to target reproductive health clinics in states where abortion care will remain legal.[15] And in those states where abortion is banned, we understand that extremists are preparing to harass clinics that provide contraception, cancer screenings, transgender care, and other reproductive health care services. As clinics, providers, and patients confront an ever-changing legal landscape on reproductive health, they need robust enforcement of the protections that remain, including DOJ's enforcement of the right of access guaranteed under the FACE Act.

Thank you for your time and consideration. We would like to request a meeting with you at your earliest convenience to discuss this letter, the attached memorandum on the availability of nationwide injunctions under the FACE Act, and the escalation in threats, harassment, and violence since the *Dobbs* decision. We look forward to being in touch with you.

Sincerely,

Eleanor Smeal
President
Feminist Majority Foundation

Katherine Spillar
Executive Director
Feminist Majority Foundation

duVergne Gaines
Director, National Clinic Access Project
Feminist Majority Foundation

(May 19, 2022), https://www.latimes.com/california/story/2022-05-19/los-angeles-antiabortion-activist-harassing-stalking-doctor); and

- a soon-to-be-opened clinic in Casper, Wyoming suffered an arson attack (*Masked, hooded woman seen on video setting fire at what would be Wyoming's only abortion clinic*, CBS News (June 6, 2022), https://www.cbsnews.com/news/wyoming-only-abortion-clinic-arson-video-reward/).

[15] *E.g.*, Priscilla Alvarez, *DHS Warns of Potential Violent Extremist Activity in Response to Abortion Ruling*, CNN (June 24, 2022, 4:57 PM), https://www.cnn.com/2022/06/24/politics/dhs-warning-abortion-ruling/index.html (explaining that, per the Department of Homeland Security, reproductive and "family advocacy health care facilities" are likely targets of violence and criminal activity post *Dobbs*).

EXHIBIT 058

CONFIDENTIAL TREATMENT REQUESTED
EXEMPT FROM FOIA

August 25, 2022

Memorandum

To: Hon. Merrick Garland, Attorney General of the United States
Hon. Vanita Gupta, Associate Attorney General of the United States
Hon. Kristen Clarke, Assistant Attorney General of the United States
James Felte, Chief, Criminal Section, Civil Rights Division
Steven Rosenbaum, Chief, Special Litigation Section, Civil Rights Division
Paige Fitzgerald, Principal Chief, Criminal Section, Civil Rights Division
Laura Cowall, Deputy Chief, Special Litigation Section, Civil Rights Division
Sanjay Patel, Trial Attorney, Criminal Section, Civil Rights Division
Elizabeth Saxe, Trial Attorney, S pecial Litigation Section, Civil Rights Division

From: Feminist Majority Foundation[1]

Re: Nationwide Injunctions Under the FACE Act

In the weeks leading up to and following the Supreme Court's decision in *Dobbs v. Jackson Women's Health Organization*—overturning *Roe v. Wade* and holding that there is no constitutionally protected right to an abortion—violence and harassment against reproductive health care providers and patients has noticeably increased. Clinic invasions and organized obstructions, as well as arson attacks, have occurred across the country with increasing regularity. And the anti-abortion extremists who are perpetrating this illegal conduct have pledged to escalate their efforts: in a recent suit brought by a Tennessee clinic under the Freedom of Access to Clinic Entrances Act ("FACE Act"), the clinic cited frequent instances of trespass, intimidation, and clinic entrance obstruction, as well as a threat from the defendants to intensify their assault on the clinic.[2]

Attorney General Garland made clear in the wake of the *Dobbs* ruling that the U.S. Department of Justice ("DOJ") would not tolerate violence or threats of violence directed at

[1] Feminist Majority Foundation ("FMF") is a not-for-profit, national organization dedicated to advancing women's equality, non-violence, economic development, reproductive justice, and access to contraception, abortion, and reproductive healthcare. FMF's National Clinic Access Project, which began in 1989, leads efforts nationwide to reduce anti-abortion violence, keep abortion care personnel and patients safe, keep clinics open, and bring violent anti-abortion extremists to justice. Since 1993, FMF has periodically conducted a National Clinic Violence Survey. Feminist Majority Foundation, *Feminist Majority Foundation Clinic Violence Survey*, https://feminist.org/our-work/national-clinic-access-project/monitoring-clinic-violence/ (containing links to all surveys conducted since 1993). The survey is one of the most comprehensive longitudinal studies of anti-abortion violence and harassment directed at clinics, patients, health care workers, and volunteers in the United States.

[2] Mem. of Law in Support of Emergency Mot. For TRO at 1-2, *Femhealth USA, Inc., d/b/a Carafem v. Williams et al.*, No. 22-cv-00565 (M.D. Tn. July 29, 2022), ECF No. 3.

reproductive health providers and individuals seeking reproductive health services, and would use "every tool at [DOJ's] disposal to protect reproductive freedom."[3] DOJ's pursuit of criminal charges for FACE Act violations is an important step in protecting reproductive health care rights. However, it is critical that DOJ expand its efforts and pursue civil actions under the FACE Act as well. In particular, to help quell the well-documented and escalating violence and harassment targeting clinics, providers, and patients, DOJ should pursue nationwide injunctions against individuals who violate the FACE Act. By pursuing this type of broad remedy, DOJ can help protect access to necessary reproductive care under a constantly shifting reproductive rights landscape.

This memorandum outline ("memorandum") first provides a general overview of today's violence and threats facing reproductive health service providers and FMF's request that DOJ seek nationwide injunctions under the FACE Act. In support of this request, the memorandum then addresses the availability and constitutionality of nationwide injunctive relief under the FACE Act. Next, it explains why this remedy is critical to protecting clinics, providers, and patients, the breadth of relief that can be obtained via nationwide injunctions, and the strategic benefits of DOJ pursuing and obtaining nationwide injunctions under the FACE Act. Finally, it explains that nationwide injunctions under the FACE Act remain available following the *Dobbs* decision—and indeed are now an even more important enforcement tool.

I. Background and Overview of Request

Congress passed the FACE Act in 1994 in response to a marked increase in violent crimes against abortion providers and trespassing and blockading clinics. The violence and dangerous acts ranged from vandalism to arson and even to murder, and were often preceded by threats to property and life. Following its enactment, DOJ's robust enforcement of the FACE Act contributed to a significant reduction in clinic violence and harassment. One of DOJ's most effective methods of enforcement was nationwide injunctions of conduct prohibited by the FACE Act. Indeed, DOJ obtained nationwide injunctions under the FACE Act in three separate cases during the 1990s. *See United States v. Dinwiddie*, 76 F.3d 913 (8th Cir. 1996); *United States v. McMillan*, 946 F. Supp. 1254 (S.D. Miss. 1995); *United States v. Roach*, 947 F. Supp. 872 (E.D. Pa. 1996).

While civil and criminal enforcement of the FACE Act by DOJ was the norm in past decades, civil enforcement efforts have tapered in recent years. At the same time, abortion-related violence, blockades, invasions, and threats have increased as anti-abortion individuals, networks, and organizations—emboldened by a lack of meaningful local, state, and federal law enforcement, and a groundswell of state legislation that seeks to curtail abortion access—have mounted campaigns to obstruct and disrupt access to reproductive health care and harass and intimidate providers and patients.

---

[3] Press Release, U.S. Dep't of Justice, U.S. Attorney's Office, Attorney General Merrick B. Garland Statement on Supreme Court Ruling in Dobbs v. Jackson Women's Health Organization (June 24, 2022), https://www.justice.gov/opa/pr/attorney-general-merrick-b-garland-statement-supreme-court-ruling-dobbs-v-jackson-women-s.

Today's violence, obstruction, and intimidation is often perpetrated by repeat players who participated in or seek to emulate the violence and harassment that spurred passage of the FACE Act. These individuals, many of whom are active participants in anti-abortion networks or organizations, repeatedly travel from city to city and state to state, across the country, to obstruct and invade reproductive health care facilities and intimidate providers. Their coordinated campaigns deploy obstructive tactics, threats, and even violence, that interfere with and deny individuals their statutory right to clinic access.[4] According to a 2021 report by the National Abortion Federation ("NAF") on violence and disruption against abortion providers, there has been a significant increase in such conduct compared to 2020, including a 600% increase in stalking, a 450% increase in blockades, and a 163% increase in hoax devices and suspicious packages at clinics.[5]

This conduct terrorizes reproductive health care providers into closing facilities and intimidates patients out of seeking essential reproductive health care. Social media, including far-right social media platforms, is fueling the ability of groups and individuals to remotely organize and incite violence and disruption. The rise and increased use of social media enables anti-abortion leaders to organize easily across multiple states. This results in anti-abortion leaders and their adherents frequently traveling across state lines to attempt to shut down clinics or otherwise prevent abortion access. It also allows these individuals to target clinic workers, providers, and those seeking care with harassment or worse, regardless of location. In addition, social media enables anti-abortion extremists to broadcast their activity instantly: individuals increasingly use social media to livestream their threatening and obstructive tactics to recruit and incite other anti-abortion extremists to commit similar acts. These individuals also use social media to widely disseminate potential clinic vulnerabilities, exposing the clinics to even greater risk. In short, the accessibility, convenience, and speed of the internet allows individuals to more easily and more quickly target clinics and providers, placing them in greater jeopardy.

FMF is encouraged that DOJ is pursuing criminal enforcement of the FACE Act against individuals who have made it their mission to block clinic access.[6] This is an integral step

---

[4] For example, FMF estimates that the same anti-abortion extremists have taken part in at least 37 anti-abortion events since 2017.

[5] National Abortion Federation, *2021 Violence & Disruption Statistics*, https://prochoice.org/national-abortion-federation-releases-2021-violence-disruption-report/.

[6] Press Release, U.S. Dep't of Justice, Office of Public Affairs, Columbus Man Pleads Guilty to Threatening Local Reproductive Health Services Facility (Feb. 15, 2022), https://www.justice.gov/opa/pr/columbus-man-pleads-guilty-threatening-local-reproductive-health-services-facility; Press Release, U.S. Dep't of Justice, Office of Public Affairs, Ohio Man Sentenced to Prison for Threatening Reproductive Health Services Facility and an Individual Patient (June 19, 2022), https://www.justice.gov/opa/pr/ohio-man-sentenced-prison-threatening-reproductive-health-services-facility-and-individual. In early September, U.S. Attorney General Garland issued a statement emphasizing DOJ's commitment to "provide (continued...)

toward enforcing and protecting access to reproductive health services guaranteed under the FACE Act. And DOJ's novel use of the conspiracy against rights statute in addition to the FACE Act in a recent indictment sends a strong message that the Department is committed to rigorous enforcement against individuals who obstruct access to abortion services.[7]

As a complement to criminal enforcement, DOJ should seek civil injunctive relief against individuals who are repeatedly intimidating, threatening, and/or obstructing access to abortion services, frequently crossing state lines to do so, and organizing—even celebrating—these illegal acts through social media. Specifically, DOJ should vigorously pursue nationwide injunctions under the FACE Act against these individuals. Nationwide injunctions are an effective means to quelling violative conduct that can and has been replicated at multiple clinics with nationwide implications. Indeed, such injunctions are necessary to provide complete relief to abortion providers, clinic workers, and people seeking abortion care, who, country-wide, are being intimidated out of providing or accessing reproductive health services—directly contrary to the FACE Act's guarantees. Civil injunctions also can strengthen local law enforcement's real-time response to incidents, allow for further repercussions against violators, including civil and contempt charges, and carry other strategic benefits.

A combined approach of criminal and civil enforcement of the FACE Act will mean more robust protection of clinics, providers, and patients. And it will also send a strong message: the federal government does not condone intimidation or interference with an individual's right to access reproductive health services. Such a stance is essential in light of the Supreme Court's ruling in *Dobbs*.

II. Nationwide Injunctions are an Available and Constitutional Remedy Under the FACE Act

A. The FACE Act prohibits, among other things: "by force or threat of force or by physical obstruction, intentionally injur[ing], intimidat[ing] or interfer[ing] with or attempt[ing] to injure, intimidate or interfere with any person because that person is or has been, or in order to intimidate such person or any other person

---

support from federal law enforcement when an abortion clinic or reproductive health center is under attack," and reiterated that DOJ "will not tolerate violence against those seeking to obtain or provide reproductive health services, physical obstruction or property damage in violation of the FACE Act." Press Release, U.S. Dep't of Justice, Office of Public Affairs, Statement from Attorney General Merrick B. Garland Regarding Texas SB8 (Sept. 6, 2021), https://www.justice.gov/opa/pr/statement-attorney-general-merrick-b-garland-regarding-texas-sb8-0.

[7] Press Release, U.S. Dep't of Justice, Office of Public Affairs, Nine Defendants Indicted on Federal Civil Rights Conspiracy and Freedom of Access to Clinic Entrances Act (FACE Act) Offenses for Obstructing Patients and Providers of a Reproductive Health Services Facility (Mar. 30, 2022), https://www.justice.gov/opa/pr/nine-defendants-indicted-federal-civil-rights-conspiracy-and-freedom-access-clinic-entrances.

or any class of persons from, obtaining or providing reproductive health services." 18 U.S.C. § 248(a)(1).

B. Nationwide injunctions under the FACE Act are an available and constitutional remedy.

C. Courts have repeatedly upheld the constitutionality of the FACE Act and injunctions issued under the FACE Act.

1. The FACE Act itself has been upheld as a constitutional exercise of Congress's power to regulate activities substantially affecting interstate commerce.

a) *See, e.g., United States v. Gregg*, 226 F.3d 253, 262-63 (3d Cir. 2000); *Dinwiddie*, 76 F.3d at 920; *Roach*, 947 F. Supp. at 876; *McMillan*, 946 F. Supp. at 1261.

2. Courts have repeatedly rejected challenges to the FACE Act on First Amendment grounds.[8]

a) *See, e.g., Dinwiddie*, 76 F.3d at 921; *Cheffer v. Reno*, 55 F.3d 1517, 1521-22 (11th Cir. 1995) ("The FACE Act is not content or viewpoint based, is not unconstitutionally vague or overbroad, and does not violate appellants' First Amendment rights."); *Am. Life League, Inc. v. Reno*, 47 F.3d 642, 649 (4th Cir. 1995); *Roach*, 947 F. Supp. at 876.

3. Courts have also repeatedly held that injunctions limiting the ability to threaten clinic providers and patients or to physically obstruct clinic access are constitutional under the First Amendment.

a) *Dinwiddie*, 76 F.3d at 928-29; *Roach*, 947 F. Supp. at 877; *McMillan*, 946 F. Supp. at 1269.

b) By its own plain language, the FACE Act cannot be used "to prohibit any expressive conduct . . . protected . . . by the First Amendment to the Constitution." 18 U.S.C. § 248(d)(1).

D. The Supreme Court of the United States has recognized the importance of injunctive relief in ensuring the right to a legal abortion, flow of free public

---

[8] Courts have also rejected challenges to the FACE Act on equal protection grounds under the Fifth and Fourteenth Amendments. *See, e.g., Lucero v. Trosch*, 904 F. Supp. 1336, 1343 (S.D. Ala. 1995); *United States v. Dinwiddie*, 885 F. Supp. 1286, 1289 (W.D. Mo. 1995).

traffic, medical privacy, and public safety. *Madsen v. Women's Health Ctr.*, 512 U.S. 753, 767-68 (1994).

E. In addition to upholding the constitutionality of the FACE Act and injunctions issued pursuant to the FACE Act, courts have upheld the nationwide scope of FACE Act injunctions.

1. *See Dinwiddie*, 76 F.3d at 929; *see also Roach*, 947 F. Supp. at 878; *McMillan*, 946 F. Supp. at 1270.

III. Nationwide Injunctions Under the FACE Act are a Necessary Remedy to Give Full Effect to the FACE Act's Protections

A. Not only are nationwide injunctions an available and constitutional remedy under the FACE Act, but in light of the ease with which anti-abortion extremists can organize and commit abortion-related threats and violence across state lines, they are also a necessary and effective tool at the government's disposal to provide complete relief to abortion providers, clinic staff, and individuals seeking reproductive health services. *See Califano v. Yamasaki*, 442 U.S. 682, 702 (1979) (explaining that "injunctive relief should be no more burdensome than necessary to the defendant to provide complete relief to the plaintiffs").

B. Nationwide injunctions will prevent enjoined individuals from taking advantage of the loophole created by local injunctions: evading the scope of an injunction simply by engaging in violative conduct in a different location.

1. The Eighth Circuit explained that a nationwide scope was necessary in order to ensure the safety of recipients and providers of reproductive health services across the country, noting that otherwise, defendants could frustrate the purpose of the injunction by repeating the enjoined conduct in a different state:

a) "[A] narrow injunction would be insufficient to advance [the interest in protecting the staff and patients of the Planned Parenthood facility at issue as well as other reproductive health facilities]: If the permanent injunction encompassed only Planned Parenthood or the Western District of Missouri, then this Court would jeopardize the lives and safety of providers and recipients of reproductive health services who are protected by FACE. **Defendant could easily frustrate the purpose and spirit of the permanent injunction simply by stepping over state lines and engaging in similar activity at another reproductive health facility.**" *Dinwiddie*, 76 F.3d at 929 (emphasis added) (quoting *United States v. Dinwiddie*, 885 F. Supp. 1286, 1296 (W.D. Mo. 1995)).

2. Localized FACE Act injunctions may not be completely effective; they cannot stop the enjoined from going somewhere else within the state or crossing state lines to repeat their actions, or similar actions, in a different location—a tactic that is common among anti-abortion extremists.

3. A nationwide injunction is particularly warranted/justified where the defendant has committed repeated FACE Act violations—sometimes at different locations—suggesting that a narrow, localized injunction would not effectively curb the individuals' violative conduct.

   a) *Dinwiddie* acknowledged substantial evidence that the defendant repeatedly protested abortions over the course of several years, escalated her actions and threats in the most recent six months, and had committed and was likely to continue committing violations of the FACE Act.

   b) Similarly, the courts in *McMillan* and *Roach* issued nationwide injunctions under the FACE Act, implicitly recognizing the value of a nationwide rather than localized injunction.

      (1) Both *McMillan* and *Roach* involved defendants' repeated conduct. *See McMillan*, 946 F. Supp. at 1257 (plaintiff put forth evidence of at least three FACE Act violations); *Roach*, 947 F. Supp. at 873-74 (plaintiff put forth evidence of nearly twenty blockade incidents involving defendant).

         (a) *McMillan*, for instance, involved three separate occasions of FACE Act violations, which defendant denied. This led the court to find defendant "failed to show that there is no reasonable expectation that the wrong will not be repeated." *Id.* at 1267.

         (b) The *McMillan* court's injunction included a prohibition against "[e]ngaging in any conduct violative of FACE **anywhere**." *Id.* at 1270 (emphasis added).

         (c) Likewise, the *Roach* court's injunction included a prohibition against "[v]iolating the [FACE Act], **anywhere**" after finding that, "based on the history of these Defendants, there is no assurance that [blockade incidents] will not happen again." *Roach*, 947 F. Supp. at 877-78 (emphasis added).

IV. Nationwide FACE Act Injunctions Can Provide Broad Relief

A. Nationwide injunctions prohibiting violations of the FACE Act are a targeted and effective means of enforcing the FACE Act's clinic access guarantees. They protect the people and institutions vulnerable to threats and violence, and can be applied beyond just a named defendant to reach others participating in the violative violence or threats. Nationwide injunctions can also have practical civil litigation-related benefits.

B. A nationwide injunction under the FACE Act would protect current and *future* providers, clinic employees, and individuals seeking reproductive healthcare.

1. The FACE Act protects providers, individuals seeking reproductive healthcare, and other clinic staff. 18 U.S.C. § 248(a)(1), (e)(5) (prohibiting attempts to or actually injuring, intimidating, or interfering with any person because they were "obtaining or providing reproductive health services," and defining reproductive health services as "reproductive health services provided in a hospital, clinic, physician's office, or other facility, and includes medical, surgical, counselling or referral services relating to the human reproductive system, including services relating to pregnancy or the termination of pregnancy").

   a) The Eighth Circuit has rejected attempts to narrow the definitions of "providing" and "provided" to exclude clinic staff who do not perform abortions or counsel pregnant women. *See Dinwiddie*, 76 F.3d at 926.

2. Further, the FACE Act's protections reach individuals seeking reproductive healthcare in the future as well as future clinic staff and providers, e.g., individuals studying to provide reproductive health services. *See Lotierzo v. A Woman's World Med. Ctr.*, 278 F.3d 1180, 1182 (11th Cir. 2002) (holding that the FACE Act applies to violent threats made against a person who "has sought or provided, or is seeking or providing, or *will seek* or provide, reproductive health services") (emphasis added); *United States v. Dillard*, 884 F. Supp. 2d 1177, 1185 (D. Kan. 2012) ("[T]he court finds that [the FACE Act] is properly read to apply to true threats directed at discouraging physicians from completing training for the provision of abortion services."), *aff'd*, 795 F.3d 1191 (10th Cir. 2015).

   a) Many doctors trained to provide abortion care choose not to do so to avoid subjecting themselves to harassment and violence, and other trained providers are leaving the practice due to the stress and burdens of living with the constant harassment and threat of

violence.[9] A 2021 study found that only 24 percent of obstetrician-gynecologists in the U.S. provide abortion care and determined that a "combination of violent and non-violent harassment, workplace harassment, and employer obstruction related to stigma and fear of harassment" makes doctors less likely to provide abortion care.[10]

3. Using nationwide injunctions will effect broad and ongoing protection of providers, clinic staff, and clinic patients. For example, a nationwide injunction would protect a person training to become a clinic escort in Pennsylvania from threats and intimidation by individuals who thus far have targeted only a physician in Ohio.

C. A nationwide injunction under the FACE Act would protect against both force and threats of force against the provision of future services.

1. A wide range of actions may be enjoined under the FACE Act, including physical force, regardless of whether it is violent or lasts only for a short time. *See A.H. Employee Co. v. Fifth Third Bank*, 2012 WL 686704, at *12 (N.D. Ill. Mar. 1, 2012) (clarifying that the FACE Act's use of "force" refers to physical force); *New York ex rel. Spitzer v. Cain*, 418 F. Supp. 2d 457, 473 (S.D.N.Y. 2006) (explaining that force "is not limited to 'violent or assaultive force'" and that "there is no exception for fleeting or de minimis contact").

2. In addition, the physical obstruction of access to clinics, regardless of whether force is used, may be enjoined. *See e.g., Allentown Women's Center, Inc. v. Sulpizio*, 403 F. Supp. 3d 461, 470-71 (E.D. Pa. 2019); *New York ex rel. Spitzer v. Kraeger*, 160 F. Supp. 2d 360, 376 (N.D.N.Y. 2001).

3. Threats of force that constitute "true threats" under the First Amendment also may be enjoined.

a) Just as immediate action, such as physically obstructing access to a clinic, may be enjoined, threats of violence against future services or that will occur only if some future action or event takes place are violative of the FACE Act and may be enjoined—for

---

[9] *See Whole Woman's Health v. Hellerstedt*, 136 S. Ct. 2292, 2312 (2016) (noting that abortion facilities in certain parts of Texas no longer operate because Planned Parenthood is unable to find local physicians in those areas who are willing to provide abortions due in part to the hostility that abortion providers face); Lori Freedman, *Willing and Unable: Doctors' Constraints in Abortion Care* 48-49 (2010).

[10] Corinne McLeod, et al., *Individual Abortion Providers' Experience with Targeted Harassment in the United States*, 107 Contraception, March 1, 2022, at 42.

example, a threat to harm someone who works at a clinic at some uncertain point in the future.

b) "Threat of force" means speech or conduct that constitutes a true threat under the First Amendment.

(1) *New York v. Operation Rescue Nat'l*, 273 F.3d 184, 196 (2d Cir. 2001); *Planned Parenthood of Columbia/Willamette, Inc. v. Am. Coal. Of Life Activists*, 290 F.3d 1058, 1077 (9th Cir. 2002); *United States v. Dillard*, 795 F.3d 1191, 1198-99 (10th Cir. 2015).

(2) For example, the defendant in *McMillan* used threat of force when he told clinic employees, "y'all look like a bunch of birds on a telephone wire waiting to be shot off by a man with a shotgun," made his hand into the shape of a pistol, pointed at them, and said, "pow, pow, pow." *McMillan*, 946 F. Supp. at 1257. He also used threat of force when he told a patient leaving the clinic that God would destroy it in twenty-four hours, so they should not be there when the explosion occurred. *Id.*

(3) As another example, the defendant in *Dinwiddie* threatened the Medical Director when she told him to remember Dr. Gunn, an abortion provider murdered by anti-abortion extremists, because the same could happen to him. *Dinwiddie*, 76 F.3d at 917. The defendant also threatened the Executive Director when she said, "you have not seen violence yet until you see what we do to you." *Id.*

c) True threats may be conditional.

(1) *Dillard*, 795 F.3d at 1200 ("[C]ontingent'threat[s] may'still violate FACE.").

d) True threats need not be imminent.

(1) *Dillard*, 795 F.3d at 1200 ("A threat of violence does not need to be imminent so long as it 'convey[s] a gravity of purpose and likelihood of execution.") (quoting *United States v. Crews*, 781 F.2d 826, 832 (10th Cir. 1986)).

(2) *Dillard*, 795 F.3d at 1203 ("Nothing in the [FACE Act] suggests it must be limited to current or imminent health services.").

e) True threats against the provision of future services are violative.

(1) *See Lotierzo*, 278 F.3d at 1182 (holding that the FACE Act applies to violent threats made against a person who "has sought or provided, or is seeking or providing, or **will seek or provide**, reproductive health services") (emphasis added).

(2) *See United States v. Dillard*, 884 F. Supp. 2d 1177, 1185 (D. Kan. 2012) ("[T]he court finds that [the FACE Act] is properly read to apply to true threats directed at discouraging physicians from completing training for the provision of abortion services."), *aff'd*, 795 F.3d 1191 (10th Cir. 2015).

f) This broad scope of protection against force, threats, and threats against future services is especially crucial given the current climate. As discussed below,[11] it is likely that, in light of the *Dobbs* ruling, there will be new facilities and providers seeking to offer abortion services in states that continue to protect abortion access. Indeed, following the leak of the draft *Dobbs* opinion, some states had already begun taking action to ensure expanded access to reproductive care.[12] These future services and providers would be protected under a nationwide injunction.

D. A nationwide injunction would prevent violations by unnamed individuals, not only the defendant.

1. Federal Rule of Civil Procedure 65(d)(2) provides that every injunction and restraining order binds "(A) the parties; (B) the parties' officers, agents, servants, employees, and attorneys; (C) and other persons who are in active concert or participation with anyone described in Rule 65(d)(2)(A) or (B)," as long as they receive notice of the injunction.[13] Therefore, because injunctions granted under the FACE Act can be applicable to more individuals than just those named as defendants, nationwide injunctions issued under the FACE Act may have a considerably broad reach.

2. Courts have granted or upheld nationwide FACE Act injunctions against multiple defendants as well as unnamed individuals working in concert with defendants. In *McMillan* and *Roach*, the courts granted nationwide

---

[11] *See infra* section VI.A.2.

[12] Mark Joseph Stern, *The Ironic, Unintended Consequence of SCOTUS's Plan to Overturn* Roe, Slate (May 19, 2022), https://slate.com/news-and-politics/2022/05/supreme-court-abortion-roe-california-new-york-colorado.html.

[13] *See infra* section V.A.3. for a discussion of what constitutes notice.

injunctions applicable to the named defendants as well as individuals working with or for the named defendants.[14]

a) In *McMillan*, the court granted an injunction against the defendant McMillan "and his agents, servants, employees and all individuals acting in concert with him who receive notice." 946 F. Supp. at 1270.

b) In *Roach*, the court granted an injunction against all defendants and "their agents, servants, employees, attorneys, and all individuals acting in concert with them who receive actual notice." 947 F. Supp. at 878.

3. It is common to see the same individuals repeatedly lobbing threats at and inciting violence toward clinics and providers. These individuals often move from clinic to clinic and state to state, encouraging others to engage in conduct that violates the FACE Act. Under a nationwide injunction, both the instigators of this harassment (i.e., the individuals named in the injunction) and those who act at their behest—even if at a different clinic in a different state than the incident that gave rise to the injunction in the first place—would be subject to the injunction's terms. As such, the injunction would reach the violative actions of a wide group of individuals across a wide geographic area, resulting in broader protection for providers and patients.

V. The Pursuit and Obtainment of Nationwide Injunctions by DOJ Carries Strategic Benefits

A. Nationwide injunctions can strengthen law enforcement's real-time response to incidents targeting clinics, providers, and patients.

1. As discussed above, law enforcement may take action against individuals that are agents of or acting in concert with parties subject to an injunction if they violate the terms of the injunction, provided the individuals have actual notice of the injunction. *See* Fed. R. Civ. Pro. 65(d)(2).

2. Therefore, after providing notice, law enforcement can move quickly to disperse or arrest all individuals who fail to comply with the injunction, regardless of whether they are directly named in the injunction.

---

[14] At least one court has granted a FACE Act injunction against multiple individuals *and* organizational defendants. *See Planned Parenthood of Columbia/Willamette, Inc. v. Am. Coal. Of Life Activists*, 290 F.3d 1058, 1066 (9th Cir. 2002) (granting a FACE Act injunction against individual and organizational defendants).

a) For example, in *Roach*, after "[a] deputy sheriff twice read [a] 1984 injunction issued by the Delaware County Court of Common Pleas" and "[a] deputy United States Marshal twice read [a] 1989 injunction," law enforcement dispersed and arrested individuals who were blocking access to a clinic and violating the terms of the injunctions, even though at least some individuals were not named in either injunction. 947 F. Supp. at 874.

3. Reading aloud or distributing copies of an injunction are two ways in which nonparties to an original injunction may have actual notice of an injunction. *See, e.g., State v. Franck*, 499 N.W.2d 108, 110 (N.D. 1993) (holding defendant had actual notice of injunction after police announced it through a bullhorn); *Roe v. Operation Rescue*, 730 F. Supp. 656, 659-60 (E.D. Pa. 1989), *aff'd*, 920 F.2d 213 (3d Cir. 1990) (holding an individual defendant in contempt for violating injunctions against Operation Rescue that were read aloud to a crowd).

a) Refusal to listen to the reading of an injunction or refusal to receive a physical copy is insufficient to claim lack of notice, and law enforcement may still arrest or disperse these individuals. *See Vermont Women's Health Center v. Operation Rescue*, 159 Vt. 141, 148-49 (1992) (finding that defendants had notice despite their attempt to "drown out the reading of the injunction," which the court found "probative [of the fact] that they were already aware of the content of the order and were trying to prevent the formality of notice").

B. An injunction violation can result in additional repercussions, such as contempt findings and associated penalties, and potentially quicker relief than a time-consuming trial to establish a FACE Act violation in the first instance. Indeed, DOJ could use a nationwide injunction as the basis for obtaining a criminal conviction, no matter where in the country the defendant violated the injunction and committed the FACE Act violation. *See In re Crim. Contempt Proc. Against Gerald Crawford, Michael Warren*, 329 F.3d 131,.135 (2d Cir. 2003) (affirming anti-abortion extremists' criminal contempt conviction for.willfully.violating an injunction preventing them from acting in a manner that violated the FACE Act within 15 feet of a certain clinic); *see also* 18 U.S.C. § 248(b) (providing criminal penalties for first and subsequent offenses under the FACE Act).

C. Seeking a nationwide injunction forces anti-abortion extremists to defend their actions in court, subjecting them to litigation discovery. The information

gathered during the litigation can help build evidence for future cases against repeat players.

D. Seeking a nationwide injunction, rather than narrow, localized injunctions, is more efficient and a better use of DOJ's resources.

1. A local, rather than nationwide, injunction is easier to evade, and leaves DOJ to start the enforcement process from scratch when someone subject to a local FACE Act injunction engages in violative conduct at a different clinic. *See Dinwiddie*, 76 F.3d at 929 ("Defendant could easily frustrate the purpose and spirit of the permanent injunction simply by stepping over state lines and engaging in similar activity at another reproductive health facility.").

2. Typically, individuals who engage in such violative conduct are repeat players. Indeed, there are repeat players identified in the latest criminal case filed by the DOJ (*United States v. Handy, Darnel*, etc.) who have engaged in conduct that violates the FACE Act at dozens of other clinics in the U.S. Pursuing repeat players on a violation-by-violation basis (i.e., via localized injunctions) will strain and deplete DOJ's resources. By contrast, a nationwide injunction more efficiently and effectively enjoin defendants and those working at their behest.

E. DOJ is best positioned to seek nationwide relief.

1. While the FACE Act authorizes suits by certain private individuals and State Attorneys General (*see* 18 U.S.C. § 248(C)(1)(A), (3)(A)), such actions are likely to focus on preventing FACE Act violations at one particular clinic or in one particular state. While it is possible for these plaintiffs to coordinate and seek broader injunctive relief, such an approach may pose logistical challenges and be difficult to pursue, much less obtain.

2. Furthermore, DOJ may be able to more easily coordinate federal enforcement of a nationwide injunction (e.g., via federal marshals) and bolster local law enforcement's efforts.

F. Nationwide injunctions issued under the FACE Act will not implicate the concerns expressed in the September 13, 2018 Litigation Guidelines for Cases Presenting the Possibility of Nationwide Injunctions Office of the Attorney General memorandum.

1. In the context of the FACE Act, nationwide injunctions will be directed at specific, unlawful conduct by an individual or individuals and those working with the individual(s), in order to enforce statutory law. These injunctions would not enjoin federal law or policy, and therefore would

not implicate concerns of constitutional limitations of power or disparate resolutions of legal questions.

2. While nationwide FACE injunctions apply to individuals who are not necessarily parties to a case, pursuant to Federal Rule of Civil Procedure 65(d), they are tailored to apply to those with whom the defendant(s) worked and who receive notice of the injunction.

VI. Nationwide Injunctions Under the FACE Act Remain Both Constitutional and Necessary Following the *Dobbs v. Jackson Women's Health Organization* Ruling

A. As discussed above, the FACE Act creates a statutory right of safe access to clinics and other facilities to obtain reproductive health services. This right is independent from the prior guaranteed constitutional right to abortion and state-specific abortion rights, and includes access to both abortion-related and non-abortion-related reproductive health services. *See* 18 U.S.C. § 248(e)(5) (defining "reproductive health services" to mean "medical, surgical, counselling or referral services relating to the human reproductive system, including services relating to pregnancy or the termination of a pregnancy" at hospitals, clinics, physician offices, or other facilities). Therefore, even in the absence of a federal right to abortion, the FACE Act continues to play an important role in preventing violence targeted at reproductive healthcare clinics and protecting access to these essential services.

1. In fact, in light of the *Dobbs* decision, the FACE Act is a critical tool for protecting clinics operating in states that ban or severely restrict abortion. Many clinics in these states will continue to operate in order to provide other reproductive health services protected by the FACE Act (e.g., reproductive wellness and maternal health/prenatal care, contraception and miscarriage care, cancer screenings, sexually transmitted infection testing, transgender care), and will likely be targets of continued violence and intimidation.

2. The FACE Act is of even greater importance to ensure the protection of clinics in states where abortions remain legal,[15] and in particular clinics bordering states that have banned abortions.

---

[15] Some of these states are already taking steps to further protect access to abortion care. *How Some States are Moving to Protect Abortion Access*, PBS (June 25, 2022), https://www.pbs.org/newshour/show/how-some-states-are-moving-to-protect-abortion-access (quoting the California Attorney General as saying the state is "making historical investments in expanding access to care including for individuals from other states who need it and can only find it in California, as well as filling [] gaps . . . we're doubling down on expanding access to reproductive health care, and abortion, including within our own state").

a) Clinics in states where abortion remains legal will continue to operate and are likely to become higher risk targets for violence, obstruction of access, and intimidation.

b) Furthermore, following the *Dobbs* decision, it is anticipated that providers will establish new reproductive healthcare facilities and/or expand the reproductive health services of current facilities to make abortion services more widely available in states that continue to protect abortion access. This increased capacity will allow providers and clinics to accommodate patients who travel from other states. For example:

(1) As of late May, Planned Parenthood's [redacted] affiliate intended to open new locations, expand their hours, and hire additional staff.[16]

(2) The new owners of a clinic in [redacted] Illinois are looking to expand clinic services based on the expectation that thousands more patients may seek care in Illinois following the overturning of *Roe v. Wade*.[17]

(3) NAF has been preparing for a worst-case scenario like the *Dobbs* ruling "for many years," and is currently training more doctors, identifying providers who are willing to travel or move to provide care, and is working on building a telehealth platform.[18]

---

[16] Morning Edition, *Large Numbers of People May Travel to Other Areas if Roe v. Wade is Overturned*, NPR (May 18, 2022), https://www.npr.org/2022/05/18/1099680657/large-numbers-of-people-may-travel-to-other-areas-if-roe-v-wade-is-overturned. [Hereinafter Morning Edition]

[17] Annika Merrilees, *New Owners of Metro East Abortion Clinic Prepare to Expand as Supreme Court Decision Looms*, St. Louis Post-Dispatch (June 22, 2022), https://www.stltoday.com/business/local/new-owners-of-metro-east-abortion-clinic-prepare-to-expand-as-supreme-court-decision-looms/article_2af24932-8b78-5a09-87ca-ca5684bd721a.html.

[18] Morning Edition, *supra* note 16.

c) The Attorney General's recent statement following the ruling in *Dobbs* underscores the role the FACE Act must play in protecting providers and individuals seeking abortion care in these states.[19]

B. Furthermore, it is likely that anti-abortion extremists will be emboldened by the *Dobbs* decision, and as such, will accelerate their efforts to restrict abortion access nationwide.[20] Broad injunctive relief will be crucial, therefore, to help prevent further violence and threats of violence directed at clinics, providers, and other individuals.

1. For example, a U.S. Department of Homeland Security memorandum obtained by CNN on June 24, 2022 warned of potential extremist activity in response to *Dobbs*, noting that federal and state government officials (such as judges) were most at risk for violence, as well as listing other targets such as First Amendment-protected events.[21]

2. As another example, in May 2022, SITE Intelligence Group, which shares information with law enforcement agencies, reported that far-right extremists were calling for violence against individuals protesting the leaked draft decision in *Dobbs*, including encouraging members of a far-right forum to violently oppose pro-choice protesters and calling for police to harm protesters.[22] A second report explained that a neo-Nazi

---

[19] *See* supra n. 3 ("Under the Freedom of Access to Clinic Entrances Act, the Department will continue to protect healthcare providers and individuals seeking reproductive health services in states where those services remain legal. This law prohibits anyone from obstructing access to reproductive health services through violence, threats of violence, or property damage.")

[20] *See, e.g.*, Ruth Conniff, *Wisconsin Leaders React to Supreme Court's Decision Eliminating Abortion Rights – Republicans Celebrate, Democrats Say They are "Heartbroken,"* Wisconsin Examiner (June 24, 2022), https://wisconsinexaminer.com/2022/06/24/wisconsin-leaders-react-to-supreme-court-decision-eliminating-abortion-rights/ (reporting that Wisconsin Assembly Speaker called *Dobbs* "a victory for life"); Press Release from U.S. Senator Ted Cruz, *Sen. Cruz on the Dobbs Decision: "Nothing Short of a Massive Victory for Life"* (June 24, 2022) ("The Supreme Court's decision in the Dobbs case, reversing Roe v. Wade, is nothing short of a massive victory for life . . . .").

[21] Priscilla Alvarez, *DHS Warns of Potential Violent Extremist Activity in Response to Abortion Ruling*, CNN (June 24, 2022), https://www.cnn.com/2022/06/24/politics/dhs-warning-abortion-ruling/index.html.

[22] Betsy Woodruff Swan, *Law Enforcement Officials Brace for Potential Violence Around SCOTUS Draft Opinion*, Politico (May 5, 2022), https://www.politico.com/news/2022/05/05/law-enforcement-violence-scotus-draft-roe-opinion-00030509.

group circulated a graphic calling to bomb reproductive healthcare clinics and kill pro-choice individuals.[23]

a) Moreover, Politico reported that on May 4, the National Fusion Center Association (which represents dozens of intelligence sharing hubs) held a call with local, state, and federal government "focused on threats that have metastasized in the wake of" the leaked *Dobbs* draft opinion, including the potential that pro-choice protesters could clash with anti-abortion counter-protesters or face attacks from lone extremists.[24]

C. Violence and threats of violence against abortion providers, clinic workers, and clinic patients have been and continue to be pervasive and systematic. Indeed, there is ample evidence that violence and threats of violence have risen significantly in recent years, indicating that anti-abortion extremists continue to embrace violence and intimidation as a means to achieve their goal of restricting—if not ending—safe abortion access nationwide.

1. In FMF's 2018 National Clinic Violence Survey, 52 percent of the clinics surveyed reported experiencing targeted threats and intimidation against doctors and staff members. Almost half of all abortion providers surveyed experienced some form of severe violence, threats of severe violence, or severe harassment.[25] Moreover, Black abortion providers are being increasingly targeted.[26]

2. From 2018 to 2019, the number of threats of harm and death to providers doubled and the number of clinic invasions almost doubled.[27]

3. In 2019 and 2020: a man from Ohio who had a large cache of weapons—including more than a dozen rifles and 10,000 rounds of ammunition—

---

[23] *Id.*

[24] *Id.*

[25] Feminist Majority Foundation, *National Clinic Violence Survey 2018* (2019), https://feminist.org/anti-abortion-violence/images/2018-national-clinic-violence-survey.pdf.

[26] MiQuel Davies, *Harassment at Abortion Clinics is Already Bad. It's Worse When You're Black*, Rewire News Group (Apr. 21, 2022), https://rewirenewsgroup.com/article/2022/04/21/harassment-at-abortion-clinics-is-already-bad-its-worse-when-youre-black/.

[27] National Abortion Federation, *2019 Violence and Disruption Statistics* (2020), https://prochoice.org/naf-releases-2019-violence-disruption-statistics/.

made online threats to Planned Parenthood;[28] anti-abortion extremists committed arson against providers in Missouri, Texas, Delaware, and Florida;[29] and anti-abortion extremists made bomb threats to clinics in Florida and Washington.[30]

4. According to NAF's 2020 Violence and Disruption Statistics report, reports of assault and battery outside of its member clinics increased 125 percent since 2019. Providers reported an increase in targeted incidents of hate mail and harassing phone calls, and an increase in death threats and threats of harm from 92 incidents in 2019 to 200 incidents in 2020. And in general, NAF member clinics reported an escalation in aggressive behavior from protesters during 2020.[31]

5. According to NAF's 2021 Violence and Disruption Statistics Report, there was a 200% increase in reports of stalking in the United States compared to 2020, 71 reports of hoax devices or suspicious packages at clinics compared to 27 reports in 2020, a 450% increase in blockades in 2021 as

---

[28] Mihir Zaveri, *Man With Weapons Cache Threatened Planned Parenthood and Agents, F.B.I. Says*, N.Y. Times (Aug. 13, 2019), https://www.nytimes.com/2019/08/13/us/justin-olsen-boardman-ohio.html.

[29] Press Release, U.S. Dep't of Justice, U.S. Attorney's Office for Western District of Missouri, Columbia Man Sentenced for Arson at Planned Parenthood Clinic (Sept. 2, 2020), https://www.justice.gov/usao-wdmo/pr/columbia-man-sentenced-arson-planned-parenthood-clinic; Kate Smith, *Violence Against Abortion Clinics Hit a Record High Last Year. Doctors Say It's Getting Worse.*, CBS News (Sept. 17, 2019), https://www.cbsnews.com/news/violence-against-abortion-clinics-like-planned-parenthood-hit-a-record-high-last-year-doctors-say-its-getting-worse/; Katie Shepherd, *"When Will We Start Shooting?": Teen Accused of Firebombing Planned Parenthood Shared Far-Right Memes and Fantasized About Murder*, Wash. Post (Jan. 8, 2020), https://www.washingtonpost.com/nation/2020/01/08/teen-accused-planned-parenthood-firebombing-shared-far-right-murder-memes/; Kaitlin Greenockle, *LCSO: Suspect in Custody for Arson, Uses Firebomb on Planned Parenthood Center*, Fort Myers News-Press (Oct. 14, 2020), https://www.news-press.com/story/news/crime/2020/10/14/lcso-suspect-custody-accused-firebombing-planned-parenthood/3653673001/.

[30] Press Release, U.S. Dep't of Justice, U.S. Attorney's Office for Middle District of Florida, South Carolina Man Sentenced for Making a Bomb Threat to a Clinic and Lying to the FBI (Sept. 23, 2020), https://www.justice.gov/usao-mdfl/pr/south-carolina-man-sentenced-making-bomb-threat-clinic-and-lying-fbi; Terry Preuninger, *Arrest Made in Planned Parenthood Bomb Threat*, Spokane Police Dep't (Dec. 3, 2020), https://my.spokanecity.org/police/news/2020/12/03/arrest-made-in-planned-parenthood-bomb-threat/.

[31] National Abortion Federation, *2020 Violence and Disruption Statistics (2021)*, https://prochoice.org/wp-content/uploads/2020_NAF_VD_Stats.pdf.

compared with 2020, as well as significant increases in invasions and assault and battery in 2021 compared with 2020.[32]

6. In 2021, on the anniversary of the *Roe v. Wade* decision, an individual fired a shotgun at the doors of a Knoxville, Tennessee Planned Parenthood clinic.[33] On December 31, 2021, an arsonist destroyed the same facility.[34]

7. Also in 2021, a man from Delaware pleaded guilty to federal charges for throwing a Molotov cocktail through a clinic window and painting a slogan associated with white supremacist groups on the clinic's wall.[35]

8. In late May 2022, a new clinic in Wyoming was set on fire, causing a delay of the planned opening. The clinic would be the only location in the state to offer surgical abortion services, among other reproductive health care services.[36]

9. On July 7, 2022, three clinics in Georgia were invaded by members of an anti-abortion group, who accosted clinic workers while livestreaming their invasion on social media.[37]

---

[32] *See* supra n. 5.

[33] Melissa Greene, *Police Investigating After Shots Fired at Knoxville's Planned Parenthood Clinic on Anniversary of Roe v. Wade*, WATE 6 (Jan. 22, 2021), https://www.wate.com/news/top-stories/police-investigating-after-shots-fired-at-knoxvilles-planned-parenthood-clinic-on-anniversary-of-roe-v-wade/.

[34] Press Release, Planned Parenthood of Tennessee and North Mississippi, Planned Parenthood Statement on Arson at Knoxville Health Center (Jan. 26, 2022), https://www.plannedparenthood.org/planned-parenthood-tennessee-and-north-mississippi/knoxville-arson.

[35] Press Release, U.S. Dep't of Justice, U.S. Attorney's Office for District of Delaware, Middletown Man Pleads Guilty In Federal Court to Use of Incendiary Device at Newark Planned Parenthood (Feb. 15, 2021), https://www.justice.gov/usao-de/pr/middletown-man-pleads-guilty-federal-court-use-incendiary-device-newark-planned.

[36] Vincent Del Giudice, *Wyoming's Only Surgical Abortion Clinic Will Open Despite Arson*, Bloomberg (May 27, 2022), https://www.bloomberg.com/news/articles/2022-05-27/wyoming-s-only-surgical-abortion-clinic-to-open-despite-arson.

[37] Social Media posts by Kingdom Conservative Party member Bevelyn Williams available upon request.

10. Also on July 7, 2022, a known anti-abortion leader was arrested in New York for using bike locks to seal an entrance to a clinic and for lying down in the clinic's parking lot, temporarily preventing entrance to the clinic.[38]

11. On July 29, 2022, a clinic in Tennessee filed for a temporary restraining order ("TRO") against ten anti-abortion extremists and OSA for violating the FACE Act after several OSA adherents entered the clinic and made threats including that they would "take this whole building down," "terrorize this whole building," and "do what needs to be done," and threatened to intensify their assaults on the clinic.[39] The judge granted the TRO until August 5 and subsequently extended it to August 12, the maximum allowed length, at which point a hearing will be held to determine whether further action is necessary.[40]

12. On August 4, 2022, a man from Michigan was charged with arson of an organization receiving federal funding for setting a Kalamazoo Planned Parenthood facility on fire, preventing it from opening the following day.[41] An investigation uncovered that the accused had previously referred to abortion as genocide.[42]

D. Regardless of the *Dobbs* decision, DOJ must continue to enforce the FACE Act to prevent threats and violence targeting reproductive health access, as Congress intended. Indeed, robust enforcement of the FACE Act is all the more necessary in light of the likelihood that the *Dobbs* outcome has or will embolden anti-

---

[38] *Pro-life Priest Arrested for Locking Planned Parenthood Entrance in Abortion 'Harbor' New York*, Life Site (Jul. 7, 2022), https://www.lifesitenews.com/news/pro-life-priest-arrested-for-locking-planned-parenthood-entrance-in-abortion-harbor-new-york/.

[39] Travis Loller, *Restraining Order Against Anti-Abortion Activists Extended*, AP News (Aug. 3, 2022), https://apnews.com/article/abortion-tennessee-nashville-5cd80d050678c3857d8742ec245da01c; Mem. of Law in Support of Emergency Mot. For TRO at 1-2, *Femhealth USA, Inc., d/b/a Carafem v. Williams et al.*, No. 22-cv-00565 (M.D. Tn. July 29, 2022), ECF No. 3.

[40] *Id.*

[41] C. Ryan Barber, *A Michigan Man Who Referred to Abortion as "Genocide" was Charged with Setting Fire to a Planned Parenthood*, Business Insider (Aug. 4, 2022, 7:10 PM), https://www.businessinsider.com/planned-parenthood-fire-abortion-justice-department-arsen-charge-2022-8.

[42] *Id.*

abortion extremists, perpetuating the idea that threats and violence can result in their desired outcome.

VII. Conclusion

A. Criminal FACE Act prosecutions are one piece of the robust enforcement necessary to reduce clinic violence under the FACE Act, and FMF is encouraged by DOJ's novel strategy of protecting reproductive rights by pursuing both conspiracy against rights charges and FACE Act charges. But FMF urges DOJ to enforce the FACE Act using both criminal prosecution and civil remedies in order to prevent and/or take action before violence occurs.

B. FACE Act injunctions applicable to nationwide conduct are imperative to meaningfully enforce the FACE Act and ensure its protections. Precedent establishes that nationwide injunctions under the FACE Act are permissible and necessary,[43] and the FACE Act injunctions urged in this memorandum are aimed at enforcing a long-standing federal law in an effective, constitutional, and targeted manner. Nationwide injunctions issued under the FACE Act will enable DOJ to prevent clinic obstruction and violence on a nationwide scale, rather than one clinic at a time.

---

[43] *See* discussion of nationwide injunction cases, supra Sections II, III, IV.

EXHIBIT 059

From: "Fitzgerald, Paige (CRT)" <[redacted]>
To: "Moossy, Robert (CRT)" <[redacted]>, "Felte, James (CRT)" <[redacted]>
Subject: RE: [EXTERNAL] Meeting Request, FACE Act Memo, and Cover letter
Date: Thu, 08 Sep 2022 17:48:05 -0400
Importance: Normal

Just you two.

I think this is totally in SPL's lane, and I'm not familiar with the civil FACE caselaw on injunctions. Fwiw, assuming the memo cites the cases accurately, it seems that there is precedent for nationwide injunctions against specific repeat obstructionists (and we have a bunch of them) and that such injunctions would cover those who conspire with the injunctees, so it seems like a good idea to me.

From: Moossy, Robert (CRT) <[redacted]>
Sent: Thursday, September 8, 2022 5:21 PM
To: Felte, James (CRT) <[redacted]>; Rosenbaum, Steven (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Subject: FW: [EXTERNAL] Meeting Request, FACE Act Memo, and Cover letter

Steve and FACE team: Thoughts on how to respond to this?

From: Cochran, Shaylyn (CRT) <[redacted]>
Sent: Thursday, August 25, 2022 10:30 PM
To: Clarke, Kristen (CRT) <[redacted]>; Moossy, Robert (CRT) <[redacted]>; Weiner, Robert (CRT) <[redacted]>; Bond, Rebecca (CRT) <[redacted]>
Subject: Fwd: [EXTERNAL] Meeting Request, FACE Act Memo, and Cover letter

FYSA. I'll circle back to talk further about this meeting request.

Shaylyn

Sent from my iPhone

Begin forwarded message:

From: duVergne Gaines <[redacted]@feminist.org>
Date: August 25, 2022 at 9:40:39 PM EDT
To: "Cochran, Shaylyn (CRT)" <[redacted]>, [redacted] "Fitzgerald, Paige (CRT)" <[redacted]>, "Cowall, Laura (CRT)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>, "Saxe, Elizabeth (CRT)" <[redacted]>, "Felte, James (CRT)" <[redacted]>
Cc: Ellie Smeal <[redacted]@feminist.org>, Kathy Spillar <[redacted]@feminist.org>
Subject: **[EXTERNAL] Meeting Request, FACE Act Memo, and Cover letter**

Dear Ms. Cochran, Chief Felte, Chief Rosenbaum, Principal Deputy Chief Fitzgerald, Deputy Chief Cowall, Mr. Patel, and Ms. Saxe:

Attached please find a cover letter and accompanying legal memorandum urging the DOJ to pursue nationwide injunctive relief to prevent ongoing and future violations of the Freedom of Access to Clinic Entrances (FACE) Act. We welcome your assistance in ensuring these materials reach Assistant Attorney General Clarke, Attorney General Garland and Associate Attorney General Gupta.

Together with our colleagues at the National Abortion Federation, we would like to request a meeting with you, Attorney General Garland, Associate Attorney General Gupta, and Assistant Attorney General Clarke to discuss this letter, the attached memorandum, and the escalation in threats, harassment, and violence against reproductive health care providers and patient communities since the *Dobbs* decision.

We are grateful for your leadership and commitment to ensuring clinic, provider, and patient safety.

Thank you for your time and attention to these materials and to our request.

Best,

Eleanor Smeal, President,
Katherine Spillar, Executive Director,
and duVergne Gaines, Director, National Clinic Access Project
Feminist Majority Foundation
●: [redacted]
E: [redacted]

The information contained in this electronic message and any attached documents are privileged, confidential and protected from disclosure, and the information may not necessarily express the opinion of Feminist Majority Foundation. If you are not the intended recipient, note that any review, disclosure, copying, or dissemination of this message or any attachments is strictly prohibited. If you think that you have received this message in error, please destroy it and notify the sender.

EXHIBIT 060

From: "Cowall, Laura (CRT)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Cc: "Klugman, Maura (CRT)" <[redacted]>
Subject: RE: Moscinski
Date: Mon, 27 Feb 2023 15:36:03 -0500
Importance: Normal
Inline-Images: image001.jpg; image002.jpg; image003.jpg

Good to know, we'll try to move things along on our end, thanks for the heads-up!

Laura

From: Patel, Sanjay (CRT)"<[redacted]>
Sent: Monday, February 27, 2023 3:09 PM
To: Cowall, Laura (CRT)"<[redacted]>
Cc: Klugman, Maura (CRT) <[redacted]>
Subject: RE: Moscinski

Hey, Laura -
I'll take care of that.

Also, I had a few calls with duVergne last week, and I think she is getting ready to make some noise about her letter/brief from last year about the nationwide injunctive relief issue.
Putting it on your radar.

SP

From: Cowall, Laura (CRT)"<[redacted]>
Sent: Monday, February 27, 2023 2:44 PM
To: Patel, Sanjay (CRT)"<[redacted]>
Cc: Klugman, Maura (CRT) <[redacted]>
Subject: FW: Moscinski

Hey Sanjay,

The NY AG's office attorney is asking to get on this mailing list (suppose Mo and I should too). How do we do that?
Thanks!

Laura

From: Pullman, Sandra <[redacted]@ag.ny.gov>
Sent: Monday, February 27, 2023 2:27 PM
To: Cowall, Laura (CRT)"<[redacted]>
Subject: [EXTERNAL] RE: Moscinski

Thanks so much for sending!

I'd love to get on this mailing list, if you know who the right person to contact about that.

Hope you're doing well—
Sandra

From: Cowall, Laura (CRT)"[redacted]
Sent: Monday, February 27, 2023 1:00 PM
To: Balaban, Rachel (USANYE) [redacted]; Pullman, Sandra [redacted]@ag.ny.gov>; Levine, Danielle (USANYS) [redacted]; Cha-Kim, Stephen (USANYS) [redacted]; Blain, Ellen (USANYS) [redacted]; Klugman, Maura (CRT) [redacted]
Cc: Goldberger, Michael (USANYE) [redacted]
Subject: RE: Moscinski

Also FYI on Moscinski:

From: NAF Security Department [redacted]@prochoice.org>
Sent: Monday, February 27, 2023 9:52 AM
To: Patel, Sanjay (CRT) [redacted]
Subject: [EXTERNAL] Security Alert: Six Anti-Abortion Extremists Found Guilty by Michigan District Court

NAF Member Security Alert: Six Anti-Abortion Extremists Found Guilty by Michigan District Court

February 27, 2023

Anti-abortion extremists [redacted], Christopher Moscinski, [redacted], [redacted], [redacted], and [redacted] were found guilty of [redacted] by a district court last Friday. [redacted], Moscinski, and [redacted] were also found guilty of [redacted] The charges stem from a Red Rose invasion at a NAF member facility in **Southfield, MI**, in 2020 where the extremists entered the clinic and began harassing patients and staff while a larger group roamed the parking lot shouting through megaphones.

Sentencing is scheduled for March 30 at the 46th District Court in **Southfield, MI.**
The NAF Security Team advises that you review your invasion protocols with staff and

share this alert with them. The NAF Security Team will provide updates as more information becomes available.

We urge all our members to continue to report any acts of obstruction, intimidation, or other potential FACE Act violations to NAF Security and law enforcement. Timely reporting enables us to provide support and can help maintain safe access to reproductive health care for all.

Please contact [redacted]@prochoice.org or members of the Security Team directly with questions about this alert, submitting incident reports, or any other security concerns:

Michelle Davidson, Security Director:
[redacted]@prochoice.org; [redacted]

Robert Ledogar, Southeast Security Manager:
[redacted]@prochoice.org; [redacted]

Eduardo Serrano, Intelligence Analyst:
[redacted]@prochoice.org

Michelle and Robert are available by phone, 24 hours a day, to assist you with any security incidents, threats, or emergencies.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

Facebook Twitter YouTube Website Instagram

Copyright © 2023 National Abortion Federation. All rights reserved.
[redacted]

You are receiving these emails because you are either a NAF member or subscribed via our website.
You can update your email preferences at any time by contacting [redacted]

From: Balaban, Rachel (USANYE) <[redacted]>
Sent: Friday, February 24, 2023 1:08 PM
To: Pullman, Sandra <[redacted]@ag.ny.gov>; Levine, Danielle (USANYS) <[redacted]>; Cha-Kim, Stephen (USANYS) <[redacted]>; Blain, Ellen (USANYS) <[redacted]>; Cowall, Laura (CRT) <[redacted]>; Klugman, Maura (CRT) <[redacted]>

Cc: Goldberger, Michael (USANYE) <[redacted]>
Subject: RE: Moscinski

Hi – We would like to get a call set up to all speak further on Moscinski. Please let me know your availability for the week of March 6 and I will circulate a WebEx. Thanks and have a nice weekend.

Rachel

Rachel G. Balaban
Deputy Chief of Appeals, Civil Division
Assistant U.S. Attorney
United States Attorney's Office
Eastern District of New York
[redacted]

IMPORTANT NOTICE: This e-mail, including any attachments, may be confidential, privileged or otherwise legally protected. It is intended only for the addressee. If you received this e-mail in error or from someone who was not authorized to send it to you, do not disseminate, copy or otherwise use this e-mail or its attachments. Please notify the sender immediately by reply e-mail and delete the e-mail from your system.

EXHIBIT 061

Memorandum

Subject:	Request for Settlement Authority under the Freedom of Access to Clinic Entrances Act, 18 U.S.C. § 248, against [redacted]	Date:	February 14, 2024

To: Kristen Clarke
Assistant Attorney General
Civil Rights Division

From: Steven H. Rosenbaum, Chief
Laura L. Cowall, Deputy Chief
Maura M. Klugman, Deputy Chief
Alyssa Wright, Trial Attorney
Jared D. Hager, Trial Attorney
Special Litigation Section

Copy: [redacted]
U.S. Attorney's Office [redacted]

I. RECOMMENDATION

We recommend you authorize proposed consent decrees under the Freedom of Access to Clinic Entrances (FACE) Act, 18 U.S.C. § 248, to resolve all claims against [redacted] and [redacted], two of seven individual Defendants in the proposed lawsuit you approved on December 8, 2023. [redacted] participated in the June 4, 2021 Red Rose Rescue (RRR) physical obstruction of the [redacted] Center in [redacted]. [redacted] participated in the June 5, 2021 RRR physical obstruction of the [redacted] of Planned Parenthood [redacted] in [redacted]. We developed evidence showing that [redacted] and [redacted] used physical obstruction to intentionally interfere with people obtaining or providing reproductive health services.

We sent letters to all defendants on December 20, 2023, stating our intent to file suit in 30 days unless Defendants contacted us and were willing to enter into a court enforceable settlement. On January 16, 2024, [redacted] counsel called our office to confirm receipt of the letter and inquired about settling prior to litigation. Later that same day, [redacted] counsel confirmed [redacted] interest in pursuing a settlement. On January 26, 2024, the United States Attorney's Office for the [redacted] (USAO) received a letter from [redacted] indicating [redacted] interest in settlement. The letter, which sent from the [redacted].

The consent decrees would ensure both [redacted] and [redacted] maintain distance from clinics nationwide and are prohibited from violating FACE in the future. The proposed resolution also avoids the risks posed by litigation and ensures that [redacted] and [redacted] will be bound by a court-enforceable agreement. The USAO joins this recommendation.

II. FACTUAL BACKGROUND

We received approval to file a complaint showing that [redacted] and [redacted] violated the FACE Act in [redacted] and [redacted] on June 4 and 5, 2021, respectively. The complaint also alleges that [redacted], Christopher Moscinski and [redacted] participated alongside [redacted] during the [redacted] invasion, while Lauren Handy and [redacted] worked with [redacted] during the [redacted] invasion.[1]

A. [redacted]' Activity on June 4, 2021

On the morning of Friday, June 4, 2021, [redacted] Christopher Moscinski, [redacted], and about 17 others participated in a RRR event at the [redacted] Women's Clinic in [redacted], a reproductive clinic that typically performs medical and surgical abortion services seven days a week.[2] [redacted] initially entered the lobby alone and began to check in for an appointment [redacted] made days earlier under false pretenses in order to gain entry to the clinic. [redacted] stated [redacted] left something in the car and exited the building. Shortly thereafter, [redacted] reentered the Center with [redacted] through the back door while [redacted] and Moscinski came in the front door. They all sat in the lobby with at least two large bags.

The front desk employees attempted to communicate with the four individuals, but they were ignoring or failing to abide by staff requests. Defendants began handing out red roses to the patients in the lobby, screaming at the patients not to go through with their appointments, and yelling out Bible verses and gospel songs.[3] The staff repeatedly asked for the four individuals to leave, but they all refused. Employees called 911. The police arrived and attempted to persuade [redacted], Moscinski, [redacted], and [redacted] to leave. Obtained cell phone video shows [redacted] sitting in a chair, [redacted] lying on the floor parallel to the front desk, [redacted] sitting cross-legged, and Christopher Moscinski kneeling near the Center's door with the officers partially inside the entryway. The officers "gave the protesters multiple chances to leave," but "after they continually refused to leave, officers advised them that they were now under arrest" for criminal trespass.[4] When asked to place their hands behind their backs, the protesters instead "sprawled out on the floor and passively resisted" in the Center's lobby.[5] Each individual Defendant had to be carried out of the Center's waiting room into the police cruisers outside.

While the Center did not close, multiple appointments were significantly delayed, and some needed to be rescheduled.[6] The Center's owner stated that "some patients called and said they were

---

[1] [redacted] was also present during the [redacted] incident but did not participate in the invasion or violate the FACE Act on June 4, 2021. Conversely, [redacted] was also present during the [redacted] incident but did not participate in the invasion or violate the FACE Act on June 5, 2021.

[2] More information may be found here: [redacted] Women's Center Home Page, [redacted] (last visited Jan. 24, 2024).

[3] Phone interview with patient [redacted] by SPL attorney Alyssa Wright; August 15, 2022; FBI Interviews with [redacted]

[4] Officer [redacted] Arrest Report.

[5] *Id.*

[6] FBI Interview with [redacted]

not coming because they saw the police outside the building"[7] and that at least five consult appointments did not show up that day.[7]

B. [redacted] History

Defendant [redacted] has a long history of sidewalk counseling and participation in Red Rose Rescue events. Since 2017, [redacted] has been arrested at least four times in [redacted], [redacted], [redacted], and [redacted] for conduct in or near reproductive healthcare facilities. [redacted] previous charges include obstructing the police, unlawful entry, and trespass. [redacted] has also spoken publicly about [redacted] participation in, and support of, the Red Rose Rescue invasions. As recently as March 2023, [redacted] gave a presentation about RRR to Corpus Christi for Unity and Peace, an organization that defends "courageous priests and people who defend the sanctity of life, liberty, marriage, natural law and our democratic republic."[8] [redacted] explained that one of the Red Rose Rescue tactics is to tell clinic staff and police officers that "we aren't going to leave [inside of the clinic] until this place shuts down."[9] [redacted] told the audience that [redacted] participated in RRR invasions "four or five times over the past four years," and worked with Operation Rescue before then.[10] [redacted] has purportedly participated in anti-abortion activism for over three decades.[11]

On April 24, 2021, [redacted], along with co-defendant Mosciński, invaded [redacted] in [redacted], [redacted] as part of a Red Rose Rescue event. According to the [redacted] Attorney General's complaint, [redacted] entered the clinic's lobby, went limp and dropped to the floor, and required police to carry [redacted] out. [redacted] lay on the floor, screaming, "I am not leaving." [redacted] was convicted of trespassing and second-degree obstruction of government administration. During [redacted] sentencing on June 30, 2023, [redacted] stared: "Your Honor, I stand before you, a fellow[redacted], unjustly convicted of trespass at an abortion clinic . . . for peacefully offering roses inside an abortion clinic to other fellow women, mothers, in the hope of convincing them not to pay someone to dismember their helpless children . . . I know it is worth the effort to reach out to mothers at abortion facilities."[12] [redacted] completed [redacted] sentence at the [redacted] Correctional Center in [redacted] in 2023. In

---

[7] FBI Interview with [redacted] we are still investigating the exact number of appointments that were kept, canceled, and rescheduled.

[8] Corpus Christi for Unity and Peace, YouTube https://www.youtube.com/@CorpusChristiforUnityandPeace; see also Corpus Christi for Unity and Peace Home Page, https://www.corpuschristiforunityandpeace.org/who-we-are/ (last visited Jan. 24, 2024).

[9] (2:44) Corpus Christi for Unity and Peace, [redacted], *Red Rose Rescue, Practicing Civil Disobedience to Save Babies*, YouTube (March 12, 2023) https://www.youtube.com/[redacted]

[10] (3:10) Corpus Christi for Unity and Peace, [redacted], *Red Rose Rescue, Practicing Civil Disobedience to Save Babies*, YouTube (March 12, 2023) https://www.youtube.com/[redacted].

[11] Patty Knap, Red Roses Mean Love: Jury Convicts Priest and Two Others for [redacted] 'Red Rose Rescue', National Catholic Register (Feb. 14, 2023), https://www.ncregister.com/blog/red-rose-rescue-feb-10-verdict.

[12] Bernadette Patel, *The witness of Red Rose Rescuers Fr. Fidelis Mosciński and* [redacted], The Catholic World Report (July 1, 2023), https://www.catholicworldreport.com/2023/07/01/the-witness-of-red-rose-rescuers-fr-fidelis-mosciński-and-[redacted]/.

June 2023, the [redacted] Attorney General filed a civil suit against [redacted] for violations of the FACE Act and [redacted] Clinic Access Act for [redacted] conduct during this incident.[13]

On August 27, 2021, [redacted] entered the [redacted] Center in [redacted] as part of another Red Rose Rescue. One individual hid in a bathroom and caused the clinic to evacuate all patients for safety concerns. [redacted] and at least one other Red Rose Rescue member also refused to leave the premises during this time. A SWAT team was eventually called to remove the protestor from the clinic bathroom, and the clinic was forced to cease operations for the rest of the day. The Special Litigation Section has an open FACE investigation into this Red Rose Rescue and [redacted] conduct during the invasion.

On April 23, 2022, ten members of Red Rose Rescue, including [redacted] and co-defendant Moscinski, entered [redacted] in [redacted]. After refusing to leave the clinic lobby, [redacted] was arrested alongside other Red Rose Rescuers and had to be removed from the clinic in a wheelchair. [redacted] was found guilty of trespassing and resisting arrest and served [redacted] sentence at the [redacted] County Jail in [redacted] in 2023.

We also received information from the Criminal Section that [redacted] was involved in a clinic obstruction in [redacted] on January 21, 2023. [redacted] used similar tactics to the [redacted] incident, including making an appointment under false pretenses to gain access to the clinic, in order to invade the facility and shut down services. More information from the Criminal Section about [redacted] participation in the incident is forthcoming.[14]

While researching the [redacted] incident, we discovered that [redacted] also participated in two RRR incidents on March 3, 2023. First, [redacted] and one other [redacted], entered the [redacted] in [redacted], and, ignoring commands to leave by both a clinic staff member and a security guard, proceeded to hand out roses to patients in the waiting room. While [redacted] left shortly after, [redacted] stayed and laid down in front of the clinic entryway. The clinic called 911 while the security guard attempted to physically remove [redacted] from the area. Later that same day, [redacted] and [redacted] also tried to enter the [redacted], about 20 minutes away from the [redacted] clinic. Both women were turned away by the security officer at the [redacted] clinic entrance after refusing to provide identification and "acting suspiciously," according to documentation from the clinic's manager of security and facilities.[15]

The National Abortion Federation has tracked [redacted] and reports that in addition to the incidents listed above, [redacted] has participated in incidents on the following dates: (1) October 14, 2020 at the [redacted] in [redacted]; (2) November 27, 2021

---

[13] Compl. at 17-18, ECF No. 1, June 8, 2023.

[14] On January 29, 2024, the Criminal Section informed us that they declined to prosecute this incident because of resource constraints, lack of RRR planning documentation, and the incidental nature of the force used by [redacted] and other participants. The Criminal Section has since referred the matter to our Section for potential civil enforcement.

[15] E-mail from [redacted] Manager of Security & Facilities at [redacted], to [redacted] and [redacted], FBI, (Mar. 3, 2023, 02:38 PM).

in [redacted], [redacted];[16] (3) January 22, 2022 in [redacted]; (4) May 26, 2022 at the [redacted] in [redacted], [redacted]; and (5) December 2, 2022 at [redacted] in [redacted]. The National Abortion Federation is creating an overview document for us that describes these additional incidents, including [redacted]' conduct during each event.

C. [redacted] Activity on June 5, 2021

Around 8:50 a.m. on June 5, 2021, [redacted], Lauren Handy, [redacted], and about 12 others arrived at the [redacted] [redacted] as part of an RRR event. Handy, [redacted], and [redacted] trespassed on clinic property and refused to leave when asked by staff. [redacted] entered the facility with other patients, sat down, but within seconds stood up and began proselytizing. Staff confronted [redacted] and demanded [redacted] leave the facility. After engaging in a physical altercation with a patient inside the facility, [redacted] left the clinic building, but remained on private property, sitting in the center of the parking lot. Worried staff then ceased normal operations, needing to ensure that everyone in the clinic was supposed to be there. While [redacted] sat in the middle of the parking lot, other RRR participants kneeled and prayed by the clinic's front door, while others confronted patients and their companions at their cars.

Staff called police around 8:50 a.m., after [redacted] was discovered inside the facility. Four of eight available units of the [redacted] Police Department responded, including the K9 unit. About an hour after their arrival, police ordered RRR participants to vacate or be arrested. While being questioned by police, [redacted] stated, "I went inside because they're killing babies in there." After officers gathered [redacted] information, [redacted] complied with their request to leave the parking lot. Handy and [redacted] did not comply, however, and were arrested against their non-violent resistance.

Around 10:05 a.m., the on-scene commanding officer suggested that the clinic close for the day because the [redacted] Police Department could not arrest all protesters due to COVID restrictions at the jail, but were stretched too thin to remain on site, and therefore could not guarantee the safety of patients or staff. The clinic acquiesced and closed, cancelling 24 patient appointments, and sending home early at least six staff.

D. [redacted] History

[redacted] participation in clinic invasions and RRR events is limited compared to [redacted]' long history. Based on available information, [redacted] has been involved in one other event besides the [redacted] incident.

On October 22, 2020, [redacted] participated in the invasion of the [redacted], a facility that provides abortion and other reproductive healthcare in [redacted], along with co-Defendant Lauren Handy and eight others, forced [redacted] way into the clinic, blocked the facility entrance, and harassed patients and healthcare providers. One nurse, who was pushed by [redacted] during the initial invasion, sustained a sprained ankle because of [redacted] violent conduct. [redacted] pled guilty to this criminal FACE Act violation in March 2023. [redacted] is currently serving [redacted] sentence at the [redacted] in [redacted].

---

[16] This incident is the subject of the [redacted] civil FACE Act complaint, approved on December 8, 2023.

III. PROPOSED RELIEF

At the early settlement stage, we anticipate multiple rounds of negotiations before reaching mutually agreeable consent decrees. Therefore, this section will discuss the potential provisions we may offer Defendants [redacted] and [redacted] throughout the negotiation process.

The initial offer will contain provisions seeking to prohibit (1) future entry into any clinic, unless for legitimate medical purposes, and (2) nonconsensual contact with individuals seeking reproductive health care.i[redacted]' offer will also include a civil penalty of $9,936, which is half of the full amount we could seek against [redacted] during trial.[17] [redacted] offer has a reduced penalty of $6,624, one-third of the full penalty amount, because of [redacted] limited history of obstructive conduct at reproductive health clinics. We may also partially suspend payment on the penalties in subsequent negotiations if [redacted] or [redacted] are willing to agree to the injunctive relief provisions, conditioning payment on violation of the decree. This strategy mirrors the negotiation and final consent decree in *United States v. Courney*, Case No. 22-cv-05835 (D.N.J. Oct. 4, 2022), which consisted of injunctive relief and suspended penalties.

A. Scope of Injunctive Relief

Injunctive relief is an appropriate remedy for a FACE violation if it "burdens no more speech than necessary to serve a significant government interest." *Madsen v. Women's Health Center*, 512 U.S. 753, 765 (1994). Such an injunction must be "narrowly tailored to the evidence presented." *United States v. McMillan*, 946 F. Supp. 1254, 1269 (S.D. Miss. 1995). The Act specifically provides that "the court may award appropriate relief, including temporary, preliminary or permanent injunctive relief." 18 U.S.C. § 248(c)(2)(B).

One factor that courts evaluate to determine whether a nationwide injunction is warranted is the defendant's repetitious violations of the FACE Act. In *United States v. Dinwiddie*, the court granted a nationwide injunction against a defendant who had repeatedly protested at a clinic, often violating the FACE Act by obstructing, using physical force against, and threatening to use physical force against patients and staff. 76 F.3d 913, 917, 928 (8th Cir. 1996). Given the defendant's "consistent, repetitious, and flagrant unwillingness or inability to comply" with the FACE Act, the court determined that "a geographically narrow injunction [was] insufficient" to protect the rights of patients and staff at reproductive health facilities across the country. *Id.* at 929 (internal quotations omitted). The court enjoined the defendant from violating the FACE Act and from being "physically located within 500 feet of the entrance of any facility . . . in the United States that provide[d] reproductive health services." *Id.* at 918. Similarly, in *United States v. Roach*, a district court issued a preliminary nationwide injunction because, "based on the history" of the defendant's actions, there was no assurance that they would not violate the Act in the future. 947 F. Supp. 872, 877 (E.D. Pa. 1996).

---

[17] We did not include statutory damages in this proposal because we are concerned that seeking statutory damages would invite discussion with[redacted] about the overall number of our aggrieved parties and their identities. Moreover, we want to minimize[redacted] financial liability as an incentive to settle.

Following Department and case law precedent, we seek to propose a nationwide injunction against [redacted] and [redacted] for their FACE Act violations. The consent decree would prevent them from coming within 15 feet of any entrance of any facility as defined by the Act unless for the sole purpose of seeking medical care for themselves or accompanying a family member seeking care. This injunctive provision is narrowly tailored to protect First Amendment activity, such as sidewalk counseling, while maintaining nationwide relief. We have secured this type of buffer zone relief in the past; in *Dinwiddie*, for example, the injunction specified that the defendant could not be within 500 feet of any reproductive health facility in the United States unless she was pursuing legitimate personal activities. 76 F.3d at 928. More recently, we have secured a 25-foot buffer zone around a New Jersey reproductive health facility, *United States v. Courney*, No. 2:22-cv-05835 (D.N.J. Oct. 4, 2022), and a 15-foot buffer zone around all reproductive health facilities in the Eastern and Southern Districts of New York, *New York by James v. Rescue*, 2023 WL 8472727, at *23 (S.D.N.Y. Dec. 7, 2023).

In December 2023, the Southern District of New York granted a partial preliminary injunction against [redacted] and other Red Rose Rescue defendants. *New York by James v. Rescue*, 2023 WL 8472727 at *23. The court agreed that a 15-foot buffer zone was appropriate to deter defendants' conduct, but limited the geographic scope of the injunction to the Eastern and Southern Districts of New York, as opposed to the entire state. *Id.* In doing so, the court reasoned that "the proposed injunction implicates Defendants' First Amendment rights, and this Court will not lightly extend that burden on Defendants' rights to jurisdictions where, by the OAG's own admission, there has never been an RRR." *Id.* This development will inform our negotiations and may affect the final consent decrees we may secure. Moreover, [redacted] response in opposition to the preliminary injunction motion sheds light on [redacted] likely position during negotiations. [redacted] argues:

> As to the first, Plaintiff adduce evidence that [redacted] trespassed at one clinic in [redacted], over two years ago. Plaintiff also offered a newspaper article indicating that [redacted] had been arrested for trespass in another state in April 2022. This sparse history of past conduct is insufficient to establish a threat that the conduct will recur in [redacted]. This is particularly true because the remedy Plaintiff seeks is one that, rather than being narrowly tailored to prevent unlawful conduct, instead infringes on [redacted] First Amendment rights on the public sidewalks outside abortion clinics.[18]

Consequently, we anticipate pushback from [redacted] to nationwide injunctive relief. But we have strong evidence demonstrating [redacted] has repeatedly participated in RRR events where invaders swarm clinics and refuse to leave until operations are forced to shut down. [redacted] also continues to do so despite being repeatedly arrested and convicted of trespassing. While [redacted] does not have the same lengthy history as [redacted], [redacted] did participate in RRR invasions in multiple states, justifying a nationwide injunction. We also believe that [redacted] is motivated to settle and may agree to nationwide injunctive relief. [redacted] has not participated in any invasions after 2021 and thus may be amenable to a consent decree prohibiting activity that [redacted] no longer engages in. Therefore, we believe that pursuing nationwide injunctive relief is appropriate at this stage and that our proposed injunctive relief still preserves [redacted]' and [redacted] ability to engage in protected First Amendment activity.

---

[18] Def. [redacted] Opp'n to Mot. for Prelim. Inj. at 12, ECF No. 36, Aug. 25, 2023.

IV. CONCLUSION

For the foregoing reasons, we recommend you authorize us to send proposed consent decrees to Defendants [redacted] and [redacted] to secure a court enforceable settlement. If either decline to negotiate, or if we cannot reach a mutually agreeable settlement, we will file our complaint that covers [redacted] and [redacted] conduct, along with the other seven defendants, and seeks permanent injunctive relief, compensatory damages for each aggrieved person, and civil penalties to vindicate the public interest.

Attachments
Approve _____
Disapprove _____
Comments:

EXHIBIT 062

From: NAF Security Departments [redacted]@prochoice.org>
To: <[redacted]>
Subject: Invasions at Two Washington, DC, Clinics
Date: Thu, 22 Oct 2020 20:04:46 -040[redacted]
Importance: Normal

Membership

Security Update

NAF Member Security Alert:
Invasions at Two Washington, DC, Clinics

October 22, 2020

At 9 am this morning, a group of anti-abortion extremists invaded a NAF member clinic in **Washington, DC**. When the extremists rushed the door, a staff member sustained minor injuries and was treated by medical professionals. Once inside the waiting room, some of the invaders chained themselves together using bike locks and other mechanisms so they could not be easily removed by law enforcement. They used their bodies and furniture to block the internal door and refused to leave the facility.

Approximately 10 individuals, including Joan Andrews Bell and Lauren Handy, were arrested and removed from the facility. Lauren Handy is facing [redacted] charges for another invasion in [redacted] An additional 20 protesters remained outside the building to record the incident and protest from the sidewalk.

Lauren Handy referred to this morning's invasion as a "lock and block" incident. This tactic was used by anti-abortion extremists in the '80s and early '90s before FACE was enacted in 1994. We anticipate that "lock and block" incidents will become increasingly prevalent again.

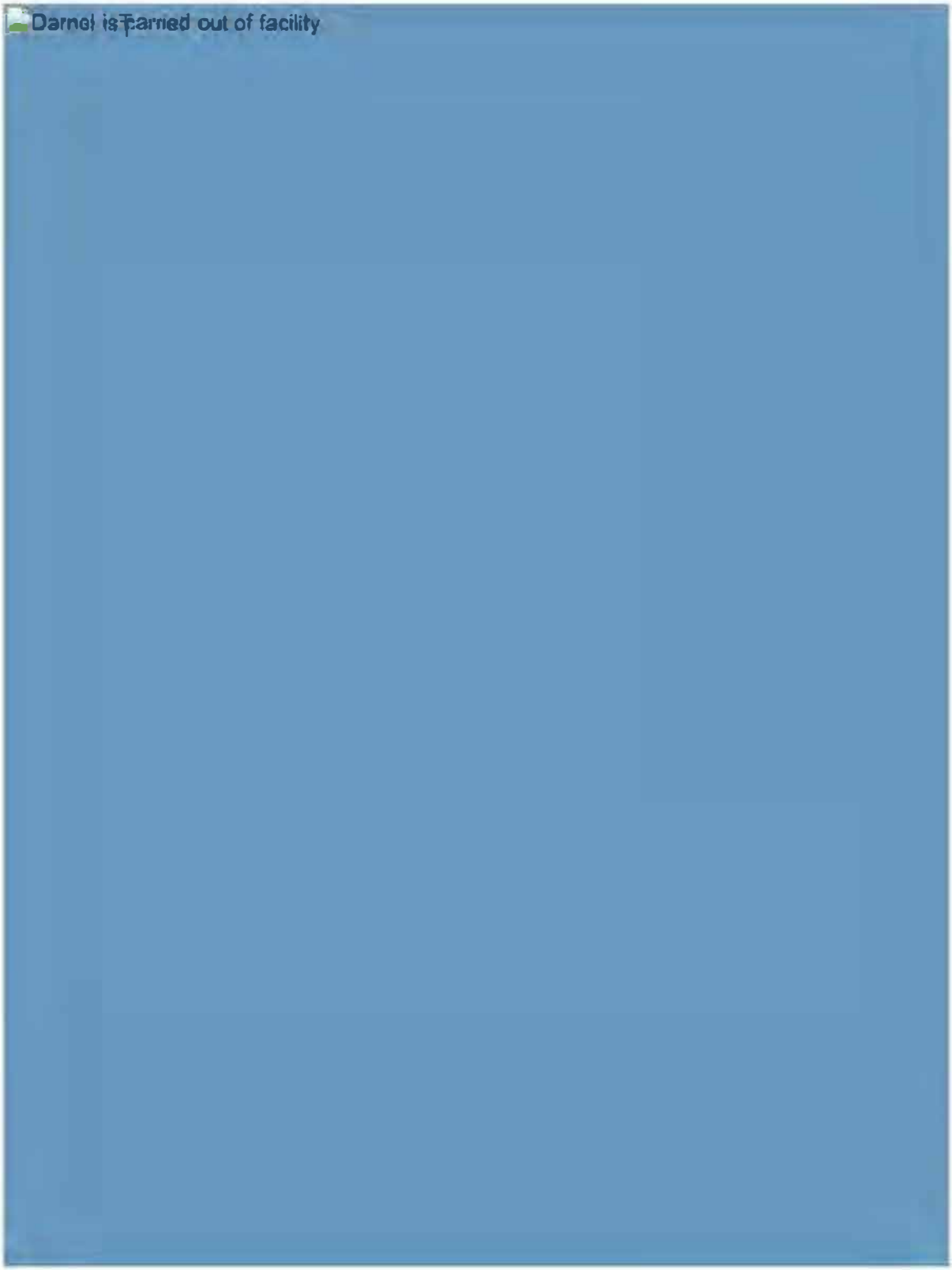


Group photo before the first invasion.



Anti-abortion extremists chain themselves together inside the clinic.

At 2:30 pm, Jonathan Darnel organized several participants from the earlier incident for a "Red Rose Rescue" invasion at a non-NAF member facility in **Washington, DC**. During these types of invasions, extremists gain access to a facility and engage with patients by handing out roses, praying, singing, and refusing to leave the property. Approximately six individuals entered the clinic; however, only Jonathan Darnel was arrested and carried out of the building (below). Law enforcement is investigating both incidents.



If you suspect anti-choice protesters have entered your facility, follow your invasion protocols and alert local police immediately, then contact NAF Security. For questions about invasions or other security protocols, please contact the NAF Security team at [redacted]@prochoice.org.

Please report any suspicious activity to law enforcement and NAF Security immediately.

The NAF Security team asks that you continue to submit your monthly violence and disruption reports on our [redacted] Please contact the team at [redacted]@prochoice.org or the individuals below by phone with questions about this alert, submitting [redacted] or any other security concerns.

Tara G., Senior Director for Security:
[redacted]

Michelle D., Security Director:
[redacted]

Emma G., Security Operations & Opposition Research Coordinator:
[redacted]

Tara and Michelle are available by phone, 24 hours a day, to assist you with any security incidents, threats, or emergencies.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

Facebook Twitter YouTube Website Instagram

Copyright © 2020 National Abortion Federation. All rights reserved.
[redacted]

You are receiving these emails because you are either a NAF member or subscribed via our website.
You can update your email preferences at any time by contacting [redacted]@prochoice.org.

EXHIBIT 063

From: Michelle Davidson <[redacted]>
To: "[redacted]" <[redacted]>, "[redacted]" <[redacted]>, "Cowall, Laura (CRT)" <[redacted]>, "Smith, Katelyn (CRT)" <[redacted]>
Cc: Emma Goldberg <[redacted]>
Subject: Blockade in TN
Date: Fri, 05 Mar 2021 09:09:41 -0500
Importance: High
Inline-Images: image003.png; image004.png

Hi Everyone,

There is an active blockade at [redacted] in Mt. Juliet, TN.
https://www.facebook.com[redacted]
We are monitoring and will download the live stream. Police are now on scene. Several patients have had to leave the building and were not able to enter the clinic.

Stay safe,

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C: [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 064

From: "Fleisher, Aaron (CRT)" <[redacted]>
To: Michelle Davidson [redacted]@prochoice.org>, "Fitzgerald, Paige (CRT)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>, Emma Goldberg <[redacted]@prochoice.org>
Subject: RE: Blockade in Michigan
Date: Thu, 27 Aug 2020 11:33:27 -0400
Importance: Normal
Inline-Images: image002.png

Thanks for this heads-up, Michelle. I'm glad to hear that police are present and arrests are being made. I can't speak for Paige and Sanjay, but I can say from the Civil side that there's not much we can do in the moment, but any video/photos/witness statements you can provide would be helpful to us so that we can evaluate what action, if any, can be taken going forward.

Aaron Fleisher
Trial Attorney
Special Litigation Section, Civil Rights Division
U.S. Department of Justice
Phone: [redacted]
Pronouns: he/him/his

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Thursday, August 27, 2020 10:08 AM
To: Fleisher, Aaron (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Blockade in Michigan
Importance: High

There is an active blockade at [redacted]. [redacted] and Chet Gallagher are among the protesters sitting in front of the doors. Local FBI has been notified and police are present. Patients and staff are not able to access the clinic. I was told by a staff member that arrests are being made. In the live video he also admits to the blockade and are calling it a "rescue".

https://www.facebook.com/[redacted]

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C: [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 065

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Carlson, Frances (USAMIE)" <[redacted]>
Subject: RE: Blockade in Saginaw
Date: Fri, 16 Apr 2021 10:44:43 -0400
Importance: Normal
Inline-Images: image001.jpg; image002.png

I was ashamed of myself for a hot second for not knowing.
Would your unit chief feel differently about Sterling Heights if some of the subjects were involved in other blockades, and that I'm hoping to indict one of them for FACE violations in DC?

From: Carlson, Frances (USAMIE)
Sent: Friday, April 16, 2021 10:41 AM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: RE: Blockade in Saginaw

Lol. Actually, I don't know my own office. There is one unit chief for our Flint and Bay City/Saginaw office. I'll connect you in a separate email.

From: Carlson, Frances (USAMIE)
Sent: Friday, April 16, 2021 10:38 AM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: RE: Blockade in Saginaw

Ah. There is a difference. I was going to connect you with the unit chief of our branch office in Flint but now I'll connect you with the unit chief of Bay City/Saginaw.

As for re-visiting Sterling Heights, I definitely do not have the support of my unit chief. This may change, however, if the same actors are involved in the Saginaw incident.

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Friday, April 16, 2021 10:36 AM
To: Carlson, Frances (USAMIE) <[redacted]>
Subject: RE: Blockade in Saginaw

Sorry– I meant Saginaw, but I guess there's no difference?

From: Patel, Sanjay (CRT)
Sent: Friday, April 16, 2021 10:34 AM
To: Carlson, Frances (USAMIE) <[redacted]>
Subject: FW: Blockade in Saginaw

Good morning, Frances.
Hope all is well.
I got word that there was an abortion clinic blockade in Flint this morning.
Can you connect me with the case agent who covers Flint?
I'd like to get a copy of the related reports and see who was arrested.

Since last summer's Sterling Heights blockade, there has been an uptick in these non-violent obstruction cases (DC, TN, MD, OH).
And, several of the Sterling Heights arrestees were involved in those incidents.
This might be a good time for us to revisit the Sterling Heights blockade.
Thoughts?

SP

From: Michelle Davidson [redacted]@prochoice.org>
Sent: Friday, April 16, 2021 9:46 AM
To: Cowall, Laura (CRT) <[redacted]>; Smith, Katelyn (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Cc: Emma Goldberg <[redacted]@prochoice.org>
Subject: Blockade in Saginaw

Hi Sanjay, Laura, and Katelyn,

There was a blockade at [redacted] in Saginaw, MI this morning. This is the sister clinic to [redacted] in Flint (RRR 6/7/2019). Two women chained themselves to the doors and two others sat down in front of other doors. We believe two of them were arrested. I'm working with the clinic to obtain the cctv footage, incident reports, and police report number. Can you contact local FBI- I can't seem to locate a contact in my files?

https://www.facebook.com/[redacted]
https://www.facebook.com/[redacted]

From what we can tell [redacted] Eva Edl, [redacted], Heather Idoni, and one other were involved.

Stay safe,

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

[redacted]
Direct line: [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 066

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "[redacted]" <[redacted]>, "Eve,tAnita (USAPAE)" <[redacted]>, "Gibson, Eric (USAPAE)" <[redacted]>
Subject: RE: : PPSP Security Incident Philadelphia
Date: Mon, 18 Oct 2021 08:25:40 -0400
Importance: Normal
Inline-Images: image001.png

Thanks, CJ.
This looks like it has merit.
We should set up a team call to discuss.
My schedule is flexible this morning, and wide open tomorrow.
Thanks,
Sanjay

From: [redacted] <[redacted]>
Sent: Saturday, October 16, 2021 5:50 PM
To: Eve, Anita (USAPAE) <[redacted]>; Gibson, Eric (USAPAE) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Subject: : PPSP Security Incident Philadelphia

[redacted]
Special Agent
Federal Bureau of Investigation
Philadelphia Division

From: [redacted] <[redacted]>
Sent: Friday, October 15, 2021 2:46:51 PM
To: Jackson, Christopher (PH) (FBI)[redacted]
Subject: [EXTERNAL EMAIL] - PPSP Security Incident

Good afternoon,

I am reaching out to see if you can provide Planned Parenthood with assistance with a recent security incident.

On 10/13/2021, Volunteer Escort [redacted] was physically pushed down by protestor Mark Houck at PP [redacted] located at [redacted], Philadelphia (video attached). Please see below statement from him. [redacted] is following up with local police but was told he needs to file a private criminal complaint and no arrest was made on scene nor a warrant was initiated.

[redacted], this is for a private criminal complaint.

Injury suffered from incident:

- A bleeding and scraped up arm, which should heal fine.
- A problem with the palm of hand/thumb which will likely keep [redacted] from certain physical activities for a number of weeks at least.
- An ache in his rightthip.

The objective of this would be to obtain an injunction similar to the following case law. Thank you in advance for your assistance.

Thank you,

[redacted], M.S.C.J, LPC
Senior Director of Security
He/Him/His

Planned Parenthood
Care. No matter what.

[redacted] • [redacted]
Phone: [redacted]

On Wed, Oct 13, 2024 at 6:26 PM [redacted] <[redacted]> wrote:

> HI -
> First of all, [redacted], as you asked in your other note, I will be going back downtown to press charges.
> Attached are photos of the injury to my arm, as well as the complaint number info given to me by Civil Affairs officer [redacted], who took my statement.
> Also note that I have a bruise and swelling on the palm of my hand from this incident.
>
> Also note that when I finally left about 2:45, Civil Affairs was across [redacted] talking to the assailant, Mark Houck.
>
> My statement:
>
> BTW, in all this, Mark was accompanied by his young son.
> Mark Houck (known provocateur) was following two women down the street and across [redacted]. I followed to let them know they could ask him to leave them alone if they wanted to.
> Mark told me to get out of the way (I wasn't in the way) and pushed my arm around. No injury from that. And that would have been out of camera range.
> I came back to the gate, talked to [redacted] a bit, and went back to near the [redacted], where Mark was. I'm guessing I was maybe 8 feet away from him.
> I go there because at the corner he attempts to confuse women who are looking to come into the clinic, and he tries to get them to go to their "clinic" across the street, thinking they are going to Planned Parenthood.
> He told me he didn't want me that close to him and his son. I told him it was a public street. He threatened to push me into the street. I asked him "is that a threat?", and he said "yes".
> I turned my back from him, and perhaps was walking a little back to towards the gate, I'm not sure. He then pushed me hard in the back and I fell to the ground, badly scraping my right arm below the elbow, which was bleeding.
> Also later realized that my palm was bruised and somewhat swollen, as I had braced myself with the hand I guess.
>
> This was witnessed by [redacted], two passers by for whom we have their info. Went in, and asked the guard to call Civil Affairs, which he did, and he also called [redacted].

Civil Affairs told me that we needed to call 911i. Not sure if that happened, but eventually Civil Affairs came out. One of the officers was [redacted] I believe. He took some info, but said it was a matter for the regular police and he would have them come out.
Civil Affairs then went back to their car. Over the next maybe half hour I went back to their car a couple times to ask when the uniforms might come. They didn't know.
A bit after the second time, Civil Affairs Officer [redacted]cam to me and said she could take the info, which she did. She was very helpful.
She told me I would need to go to the District ([redacted]) tomorrow when they'd have the info she took, if I wanted to file, and gave me the piece of paper With the DC# (photo attached).
Before this, by the way, the guard asked me to look at the footage on video with him, while he was on the phone with a tech person.
Eventually we located the incident at 12:51 PM, showing very clearly Mark pushing me down. The guard had difficulty saving the footage, but I assume that eventually happened.

That's about it. If there's anything else you need please let me know. And Once I've done the complaint of Thursday, I'll be in touch again.

EXHIBIT 067

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Kennedy, David (USANYS)" <[redacted]>
Subject: FW: Grand Rapids, Moscinski, Atlanta, California Bomb Threat
Date: Thu, 14 Jul 2022 08:09:59 -0400
Importance: Normal
Inline-Images: image014.png; image015.png; image016.png; image017.png; image018.png; image019.png; image020.png; image021.jpg; image022.jpg; image023.jpg; image024.jpg; image025.jpg; image026.jpg; image027.png; image028.png; image003.png; image004.png

---

Good morning, David.
See below update re: Moscinski.
Looks like he blockaded a Hempstead clinic last week.
Is that EDNY?
Putting this on your radar.
I'm planning to look into it.

Best,
SP

From: Michelle Davidson <[redacted]>
Sent: Wednesday, July 13, 2022 9:06 PM
To: Patel, Sanjay (CRT) [redacted]
Subject: [EXTERNAL] Grand Rapids, Moscinski, Atlanta, California Bomb Threat

https://www.facebook.com/[redacted]

Confirmed Arrested:
Cal Zastrow
Derek Anderson
[redacted]
Potentially 3 more

https://www.woodtv.com/news/grand-rapids/6-anti-abortion-protesters-arrested-at-gr-reproductive-health-clinic/amp/
Doesn't sound like the cops know about FACE...per usual.



NAF Member Security Alert: Clinic Blockade in Grand Rapids, MI, and Clinic Invaders found Guilty

July 13, 2022

Grand Rapids, MI Blockade

This morning at approximately 7:00 am, a group of about 30 anti-abortion extremists participated in a blockade at a NAF member facility in **Grand Rapids MI.** According to a livestream of the incident, members of the group blocked the driveway and employee entrances to the facility while other members of the group harassed staff as they arrived at the clinic. Protesters also distributed flyers with photos of the provider along with the provider's personal information. Staff notified local police who came to the clinic. According to reports from the staff and local news coverage, six individuals have been detained for trespassing and disobeying lawful orders.

Please be aware that acts of disruption and obstruction are expected to continue across the U.S. indefinitely. Mitigation of violence and disruption is enhanced through immediate reporting of suspicious activity, continuous communication amongst staff regarding anti-abortion activity, and preparedness training.

If anti-abortion extremists enter or attempt to enter your facility, follow your invasion protocols, alert law enforcement immediately, and contact NAF Security.

Red Rose Invaders Found Guilty by Alexandria, VA Jury

Known anti-abortion extremists Joan Andrews Bell, Terrisa Bukovinac, Lauren Handy, [redacted], and Jonathan Darnel were jailed after pleading no contest to trespassing charges in relation to a November 16, 2021, Red Rose invasion. Lauren Handy and Joan Andrews Bell were sentenced to 30 days while the others involved were sentenced to four days.

Handy, Darnell, and Bell, along with six others, are also facing federal charges for FACE Act and Civil Rights violations stemming from an invasion they participated in in October 2020.

Lauren Handy was also found guilty by a jury on June 28, in relation to a Red Rose invasion at a NAF member facility in **Flint, MI,** in 2019. The charges include resisting arrest (felony), trespassing, and disturbing the peace. Handy is scheduled for sentencing in September and could face up to two years in prison.

For questions about these incidents or any other security related matters, please contact the NAF Security team.

Please contact [redacted] or members of the Security Team directly with questions about this alert, submitting [redacted], or any other security concerns:

Michelle Davidson, Security Director:
[redacted]

Robert Ledogar, Southeast Security Manager:
[redacted]

Michelle and Robert are available by phone, 24 hours a day, to assist you with any security incidents, threats, or emergencies.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

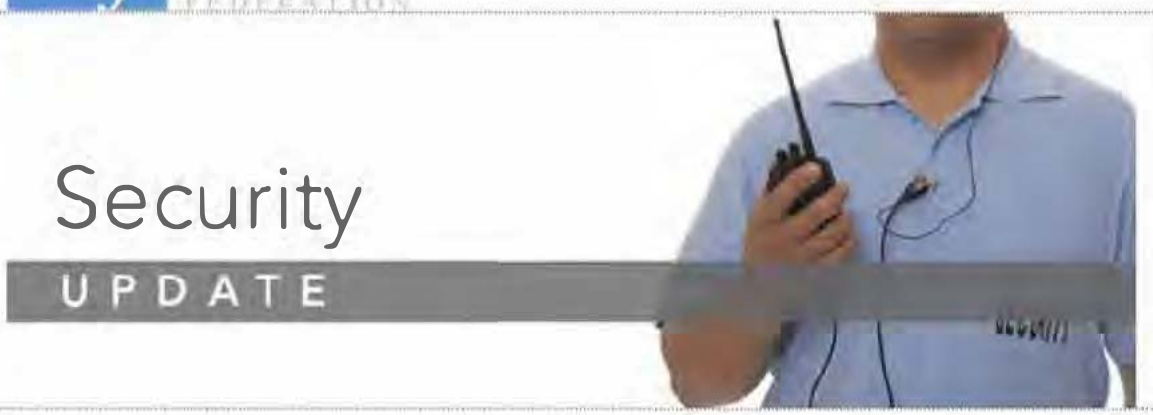
Facebook | Twitter | YouTube | Website | Instagram

Copyright © 2022 National Abortion Federation, All rights reserved.

[redacted] • [redacted]

You are receiving these emails because you are either a NAF member or subscribed via our website.
You can update your email preferences at any time by contacting [redacted]

naf NATIONAL ABORTION FEDERATION



NAF Member Security Alert: Clinic Blockade in Hempstead, NY, and Clinic Invasion in Atlanta, GA

July 11, 2022

Blockade in Hempstead, NY

On July 7 at approximately 10:00 am, anti-abortion extremist Friar Christopher "Fidelis" Moscinski carried out a clinic blockade at a non-NAF member facility in **Hempstead, NY**. Moscinski used six bike locks to obstruct access at the facility entrance, shutting down services for approximately two hours. Hempstead Police were notified and Moscinski was arrested. He was later released from the **Nassau County** jail with an order to appear in court on July 18 for charges of disorderly conduct by "obstructing vehicular traffic."





Moscinski has been arrested over a dozen times for his participation in clinic invasions, clinic blockades, and resisting arrest, and was recently convicted for misdemeanor trespassing stemming from a 2021 invasion at a NAF member facility in **White Plains, NY**. He is an active anti-abortion extremist with close ties to several anti-abortion groups.

Please be aware that acts of disruption and obstruction are expected to continue across the U.S. indefinitely. Mitigation of violence and disruption is enhanced through immediate reporting of suspicious activity, continuous communication amongst staff regarding anti-choice activity, and preparedness training.

Clinic Invasions In Atlanta, GA

Also on July 7, known anti-abortion extremists Bevelyn (Beatty) Williams, Edmee Chavennes, and Rickey Williams invaded the waiting rooms of two member facilities in **Atlanta, GA**. They began yelling at staff, speaking in tongues, and gesturing wildly while moving throughout the waiting room. Staff immediately went into lockdown and called 911. The three individuals left before the police arrived; however, a staff member was grabbed during one of the incidents and filed assault charges with the responding officer.

Prior to entering these facilities, the extremists attempted an invasion at a non-member facility and were unsuccessful due to mask requirements enforced by a staff person at the front door.



Rickey Williams



Bevelyn Williams



Edmee Chavennes

If anti-choice extremists enter or attempt to enter your facility, follow your invasion protocols, alert law enforcement immediately, and contact NAF Security.

For questions about these incidents or any other security related matters, please contact the NAF Security team.

Please contact [redacted] or members of the Security Team directly with questions about this alert, submitting [redacted], or any other security concerns:

Michelle Davidson, Security Director:
[redacted]; [redacted]

Robert Ledogar, Southeast Security Manager:
[redacted]; [redacted]

Michelle and Robert are available by phone, 24 hours a day, to assist you with any security incidents, threats, or emergencies.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

Facebook Twitter YouTube Website Instagram

Copyright © 2022 National Abortion Federation, All rights reserved.
[redacted]

You are receiving these emails because you are either a NAF member or subscribed via our website.
You can update your email preferences at any time by contacting [redacted].

naf NATIONAL ABORTION FEDERATION



NAF Security Alert: Security Update

July 1, 2022

"Red Rose" Invaders Found Guilty by Michigan Jury

Known anti-choice extremists William Goodman, Lauren Handy, [redacted] and [redacted] were found guilty by a jury on June 28, in relation to a "Red Rose" invasion at a NAF member facility in **Flint, Michigan**, in 2019. The charges included resisting arrest (felony), trespassing, and disturbing the peace. Handy, Goodman, [redacted] and [redacted] are scheduled for sentencing in September and could face up to two years in prison. Lawyers for the group stated that they plan to appeal the decision. Goodman and Handy, along with seven others, are also facing federal charges for FACE Act and Civil Rights violations stemming from an October 2020 invasion.

Bomb Threat at California Facility

A bomb threat was called in at a non-NAF member facility in **Victorville, California.** According to news reports, the threat was called in June 28 just before 4:00 pm and the facility was evacuated and police were notified. After the police arrived on

scene, a search was conducted and nothing dangerous was identified. The investigation is ongoing.

For information on how to prepare staff for this kind of obstruction or any other act of violence and disruption, refer to the NAF Security Resource Manual or contact a member of the NAF Security Team at [redacted].

Please contact [redacted] or members of the Security Team directly with questions about this alert, submitting [redacted], or any other security concerns:

Michelle Davidson, Security Director:
[redacted]; [redacted]

Robert Ledogar, Southeast Security Manager:
[redacted]; [redacted]

Michelle and Robert are available by phone, 24 hours a day, to assist you with any security incidents, threats, or emergencies.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

Facebook Twitter YouTube Website Instagram

Copyright © 2021 National Abortion Federation. All rights reserved.

[redacted]

You are receiving these emails because you are either a NAF member or subscribed via our website.
You can update your e mail preferences at any time by contacting [redacted]

-Michelle

EXHIBIT 068

From: "Patel, Sanjay (CRT)"t<[redacted]>
To: "Aloi, Elizabeth (USADC)" <[redacted]>
Subject: FW: Grand Rapids, Moscinski, Atlanta, California Bomb Threat
Date: Tue, 09 Aug 2022 09:53:18 -0400
Importance: Normal
Inline-Images: image001.jpg; image002.png; image003.png; image004.png; image005.png; image006.png; image007.png; image008.png; image009.jpg; image010.jpg; image011.jpg; image012.jpg; image013.jpg; image028.jpg; image029.png; image030.png; image017.png; image018.png

---

I think 7/12 is correct.
They pled no contest (scroll down) per the 7/13 bulletin.

From: Michelle Davidson[redacted]@prochoice.org>
Sent: Thursday, July 14, 2022 11:22 AM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: [EXTERNAL] FW: Grand Rapids, Moscinski, Atlanta, California Bomb Threat

Bevelyn and Co and currently attempting to invade clinics in Atlanta again. They got in to [redacted] and are now at [redacted]

For Grand Rapids:
These others listed could be the others arrested.
I believe[redacted]was also present/blocking. We are trying to ID everyone.

08% 20:59

Search

[redacted] **Joel Curry**

1 hour ago ·

It's time to rescue those being taken away to death. 1 save and 6 arrests in Grand Rapids!

"Jesus is King, Cesar is not"[redacted]
In the back of the cop car "You want to sing some songs?"[redacted]
"All hail the power of Jesus name" Cal Zastrow
"It's all for Him-Jesus" Justin Phillips
"I've heard an old old story about a Savior came from glory"[redacted]
To an officer arresting a peaceful Christian
"Examine yourself to see if you are in the faith"[redacted]
"You are disobeying God's Law by rewarding the evil doer and punishing those who do good"[redacted]
"What makes you different than a Nazi just following orders?"[redacted]
Me-Amen



-Michelle

From: Michelle Davidson
Sent: Wednesday, July 13, 2022 9:06 PM
To: [redacted]
Subject: Grand Rapids, Moscinski, Atlanta, California Bomb Threat

https://www.facebook.com/[redacted]

Confirmed Arrested:
Cal Zastrow
[redacted]
[redacted]
Potentially 3 more

https://www.woodtv.com/news/grand-rapids/6-anti-abortion-protesters-arrested-at-gr-reproductive-health-clinic/amp/
Doesn't sound like the cops know about FACE...per usual.

naf NATIONAL ABORTION FEDERATION



NAF Member Security Alert: Clinic Blockade in Grand Rapids, MI, and Clinic Invaders found Guilty

July 13, 2022T

Grand Rapids, MI Blockade

This morning at approximately 7:00 am, a group of about 30 anti-abortion extremists participated in a blockade at a NAF member facility in **Grand Rapids MI**. According to a livestream of the incident, members of the group blocked the driveway and employee entrances to the facility while other members of the group harassed staff as they arrived at the clinic. Protesters also distributed flyers with photos of the provider along with the provider's personal information. Staff notified local police who came to the clinic. According to reports from the staff and local news coverage, six individuals have been detained for trespassing and disobeying lawful orders.

Please be aware that acts of disruption and obstruction are expected to continue across the U.S. indefinitely. Mitigation of violence and disruption is enhanced through immediate reporting of suspicious activity, continuous communication amongst staff regarding anti-abortion activity, and preparedness training.

if anti-abortion extremists enter or attempt to enter your facility, follow your invasion protocols, alert law enforcement immediately, and contact NAF Security.

Red Rose Invaders Found Guilty by Alexandria, VA Jury

Known anti-abortion extremists Joan Andrews Bell, Terrisa Bukovinac, Lauren Handy, [redacted] and Jonathan Darnel were jailed after pleading no contest to trespassing charges in relation to a November 16, 2021, Red Rose invasion. Lauren Handy and Joan Andrews Bell were sentenced to 30 days while the others involved were sentenced to four days.

Handy, Darnell, and Bell, along with six others, are also facing federal charges for FACE Act and Civil Rights violations stemming from an invasion they participated in in October 2020.

Lauren Handy was also found guilty by a jury on June 28, in relation to a Red Rose invasion at a NAF member facility in **Flint, MI,** in 2019. The charges include resisting arrest (felony), trespassing, and disturbing the peace. Handy is scheduled for sentencing in September and could face up to two years in prison.

For questions about these incidents or any other security related matters, please contact the NAF Security team.

Please contact [redacted]@prochoice.org or members of the Security Team directly with questions about this alert, submitting incident reports, or any other security concerns:

Michelle Davidson, Security Director:
[redacted]@prochoice.org; [redacted]

Robert Ledogar, Southeast Security Manager:
[redacted]@prochoice.org; [redacted]

Michelle and Robert are available by phone, 24 hours a day, to assist you with any security incidents, threats, or emergencies.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

Copyright © 2022 National Abortion Federation. All rights reserved.

[redacted]

You are receiving these emails because you are either a NAF member or subscribed via our website.
You can update your email preferences at any time by contacting [redacted]

naf NATIONAL ABORTION FEDERATION

Security UPDATE



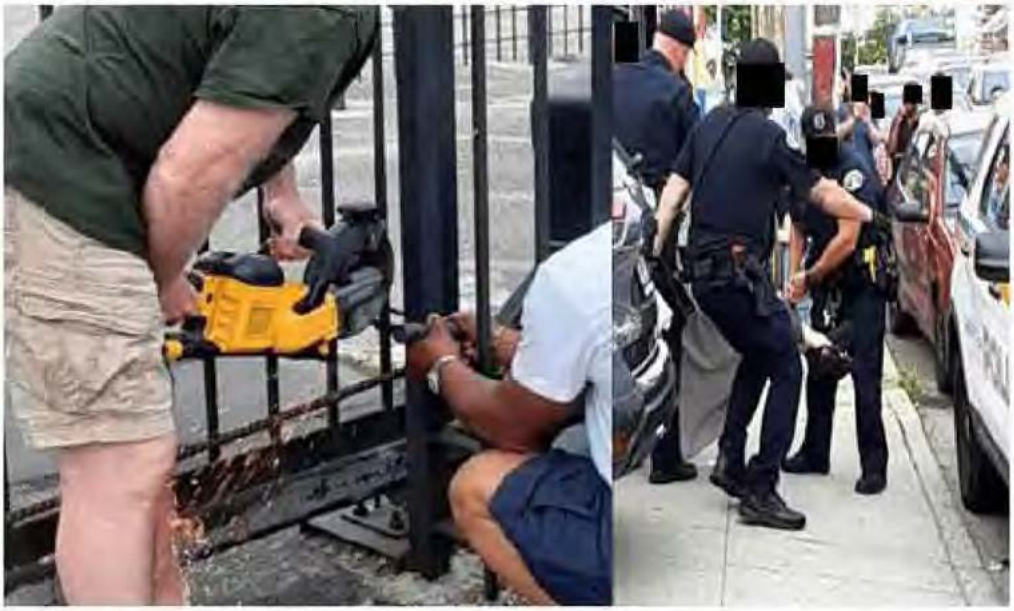
NAF Member Security Alert: Clinic Blockade in Hempstead, NY, and Clinic Invasion in Atlanta, GA

July 11, 2022

Blockade in Hempstead, NY

On July 7 at approximately 10:00 am, anti-abortion extremist Friar Christopher "Fidelis" Moscinski carried out a clinic blockade at a non-NAF member facility in **Hempstead, NY**. Moscinski used six bike locks to obstruct access at the facility entrance, shutting down services for approximately two hours. Hempstead Police were notified and Moscinski was arrested. He was later released from the **Nassau County** jail with an order to appear in court on July 18 for charges of disorderly conduct by "obstructing vehicular traffic."





Moscinski has been arrested over a dozen times for his participation in clinic invasions, clinic blockades, and resisting arrest, and was recently convicted for misdemeanor trespassing stemming from a 2021 invasion at a NAF member facility in **White Plains, NY**. He is an active anti-abortion extremist with close ties to several anti-abortion groups.

Please be aware that acts of disruption and obstruction are expected to continue across the U.S. indefinitely. Mitigation of violence and disruption is enhanced through immediate reporting of suspicious activity, continuous communication amongst staff regarding anti-choice activity, and preparedness training.

Clinic Invasions in Atlanta, GA

Also on July 7, known anti-abortion extremists Bevelyn (Beatty) Williams, Edmee Chavennes, and Rickey Williams invaded the waiting rooms of two member facilities in **Atlanta, GA**. They began yelling at staff, speaking in tongues, and gesturing wildly while moving throughout the waiting room. Staff immediately went into lockdown and called 911. The three individuals left before the police arrived; however, a staff member was grabbed during one of the incidents and filed assault charges with the responding officer.

Prior to entering these facilities, the extremists attempted an invasion at a non-member facility and were unsuccessful due to mask requirements enforced by a staff person at the front door.



Rickey Williams **Bevelyn Williams** **Edmee Chavennes**

If anti-choice extremists enter or attempt to enter your facility, follow your invasion protocols, alert law enforcement immediately, and contact NAF Security.

For questions about these incidents or any other security related matters, please contact the NAF Security team.

Please contact [redacted]@prochoice.org or members of the Security Team directly with questions about this alert, submitting incident reports, or any other security concerns:

Michelle Davidson, Security Director:
[redacted]@prochoice.org; [redacted]

Robert Ledogar, Southeast Security Manager:
[redacted]@prochoice.org; [redacted]

Michelle and Robert are available by phone, 24 hours a day, to assist you with any security incidents, threats, or emergencies.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

Facebook Twitter YouTube Website Instagram

Copyright © 2022 National Abortion Federation. All rights reserved.

[redacted]

You are receiving these emails because you are either a NAF member or subscribed via our website.
You can update your email preferences at any time by contacting [redacted]

naf NATIONAL ABORTION FEDERATION



Security UPDATE

NAF Security Alert: Security Update

July 1, 2022

"Red Rose" Invaders Found Guilty by Michigan Jury

Known anti-choice extremists William Goodman, Lauren Handy, [redacted] and [redacted] were found guilty by a jury on June 28, in relation to a "Red Rose" invasion at a NAF member facility in **Flint, Michigan**, in 2019. The charges included resisting arrest (felony), trespassing, and disturbing the peace. Handy, Goodman, [redacted] and [redacted] are scheduled for sentencing in September and could face up to two years in prison. Lawyers for the group stated that they plan to appeal the decision. Goodman and Handy, along with seven others, are also facing federal charges for FACE Act and Civil Rights violations stemming from an October 2020 invasion.

Bomb Threat at California Facility

A bomb threat was called in at a non-NAF member facility in **Victorville, California.** According to news reports, the threat was called in June 28 just before 4:00 pm and the facility was evacuated and police were notified. After the police arrived on

scene, a search was conducted and nothing dangerous was identified. The investigation is ongoing.

For information on how to prepare staff for this kind of obstruction or any other act of violence and disruption, refer to the NAF Security Resource Manual or contact a member of the NAF Security Team at [redacted]@prochoice.org.

Please contact [redacted]@prochoice.org or members of the Security Team directly with questions about this alert, submitting incident reports, or any other security concerns:

Michelle Davidson, Security Director:
[redacted]@prochoice.org; [redacted]

Robert Ledogar, Southeast Security Manager:
[redacted]@prochoice.org; [redacted]

Michelle and Robert are available by phone, 24 hours a day, to assist you with any security incidents, threats, or emergencies.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

Facebook Twitter YouTube Website Instagram

Copyright © 2021 National Abortion Federation, All rights reserved.
[redacted]

You are receiving these emails because you are either a NAF member or subscribed via our website.
You can update your email preferences at any time by contacting [redacted]

-Michelle

EXHIBIT 069

From: a" [redacted] (FBI)" <[redacted]>
To: "[redacted]" <[redacted]>, "Sanjay [redacted]"
<[redacted]>
Cc: t" [redacted] (FBI)"t<[redacted]>
Subject: Fw: Thank You
Date: Tue, 23 Mar 2021 10:24:25 -0400
Importance: Normal
Inline-Images: [redacted]

Hi Team,
It appears thar Herb Geraghty is the [redacted] individual that appears in the security videos. Link to his FB provided by Michelle below.

Thanks,

[redacted]

[redacted]
FBI
C: [redacted]
O: [redacted]

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Monday, January 4, 2021 1:35 PM
To: [redacted] (FBI)" <[redacted]>
Cc: [redacted]) (FBI)" <[redacted]>; Emma Goldberg <[redacted]@prochoice.org>; Tara Gannon <[redacted]@prochoice.org>
Subject: [EXTERNAL EMAIL] - RE: Thank You

Hi [redacted],

Below are the names and social media links for the individuals that we were able to identify. We are still working on #5 and #6. I have CC'd Tara Gannon, Senior Director for Security and Emma Goldberg, Security Operations and Opposition Research Coordinator for introductions. We are the NAF Security Team and here to help with anything you need. Looking forward to hearing how the interviews go if you are able to share, of course.

Protester 1: [redacted] (https://www.facebook.com[redacted]
Protester 2: [redacted] (https://www.facebook.com[redacted]
Protester 3: Herb Geraghty (https://twitter.com/[redacted]
Protester 4: [redacted]
(https://www.facebook.com/[redacted]

Happy New Year and stay safe,

Michelle

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C: [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

From: [redacted] (FBI) [redacted]
Sent: Wednesday, December 30, 2020 4:08 PM
To: Michelle Davidson [redacted]@prochoice.org>
Cc: [redacted] (FBI) [redacted]
Subject: Thank You

Hi Michelle,
Thank you so much for taking the time to connect today! I really appreciate you sharing your insights and information with me. Attached, please find six photos of unidentified individuals we'd be interested in speaking with. If you recognize any of them, could you please provide their name and any other identifiers you may have? Thanks again for your help and please don't hesitate to reach out to me if I can ever be of any assistance in the future.

Happy New Year!

[redacted]

[redacted]
FBI [redacted]
C: [redacted]
O: [redacted]

EXHIBIT 070

From: Michelle Davidson <mdavidson@prochoice.org>
To: [redacted] <[redacted]>
Cc: [redacted] <[redacted]>, [redacted]" <[redacted]>, security <[redacted]@prochoice.org>, "[redacted]@usdoj.gov" <[redacted]@usdoj.gov>
Subject: [EXTERNAL] RE: Identification Assistance
Date: Tue, 18 Oct 2022 12:34:30 -0400
Importance: Normal
Attachments: [redacted]Dossier.docx
Inline-Images: image001.png; image002.png; image003.png; image004.png

---

Hi Mike,

The woman in the "pro-life" shirt is [redacted]. The masked woman is [redacted]. We just ID'd [redacted] so we don't have too much on her yet.





-Michelle

From: [redacted] <[redacted]>
Sent: Monday, October 17, 2022 11:30 AM
To: Michelle Davidson <[redacted]>
Cc: [redacted] <[redacted]>; [redacted] security <[redacted]@prochoice.org>; [redacted]
Subject: RE: Identification Assistance

Thanks so much Michelle!

From: Michelle Davidson <[redacted]>
Sent: Monday, October 17, 2022 11:28 AM
To: [redacted] (WF) (FBI) <[redacted]>
Cc: [redacted] (WF) (FBI) <[redacted]>; Aloi, Elizabeth (USADC) [redacted]; security <[redacted]@prochoice.org>; Patel, Sanjay (CRT) [redacted]
Subject: [EXTERNAL EMAIL] - Re: Identification Assistance

We'll get on this for you, [redacted].

Stay safe,

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

image

[redacted]
Direct line: [redacted]



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

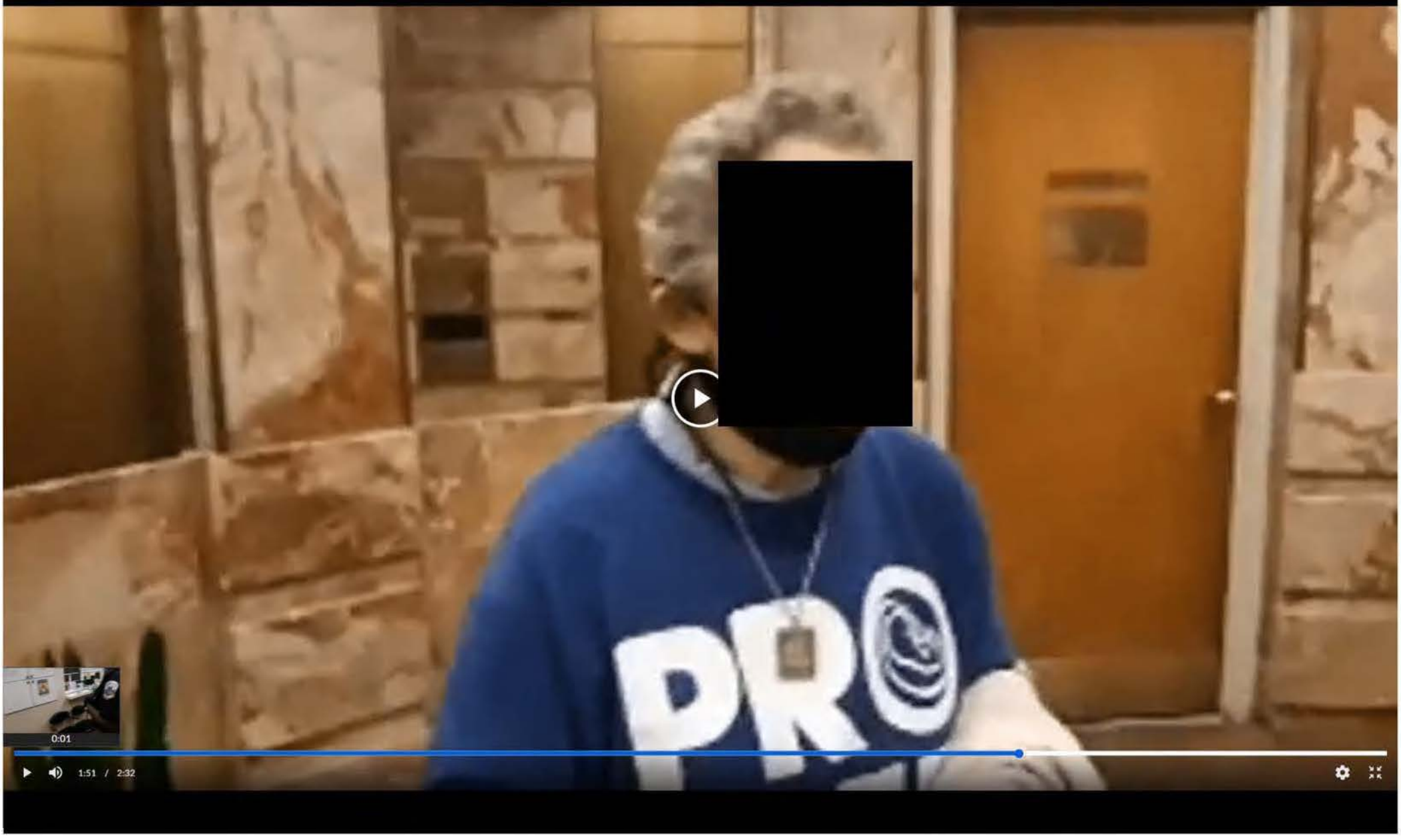
From: [redacted] <[redacted]>
Sent: Monday, October 17, 2022, 11:23 AM
To: Michelle Davidson <[redacted]>
Cc: [redacted] <[redacted]>; Emma Goldberg <[redacted]@prochoice.org>; Tara Gannon <[redacted]@prochoice.org>; [redacted] <[redacted]>; [redacted] <[redacted]>
Subject: Identification Assistance

Hi Michelle,
Hope this email finds you and your team staying healthy and safe. I was hoping you might be able to provide some assistance identifying the two individuals in the photos below. In the second photo, we were interested in the masked individual in the bedazzled "Cherish Life" shirt. Thanks so much for your help!

Best,

[redacted]

SA [redacted]
FBI | WFO | CR-10
C: [redacted]
O: [redacted]


0:01
1:51 / 2:32


2020-10-22 09:20:56 -0400
AXON BODY 3 X6039BA96
METROPOLITAN
POLICE

EXHIBIT 071

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "McNally, James (USADC)" <[redacted]>
Subject: RE: Red Rose Rescue Info Requested
Date: Mon, 14 Sep 2020 10:53:24 -0400
Importance: Normal
Attachments: 1997-Moscinski_C-Art.pdf; 201905-RWW-RRR_Art.pdf; 19951031-Moscinski_C-Art.pdf; 19970120-Moscinski_C-Art.pdf; Handy-Statements.docx; [redacted]; Red_Rose_Rescue-Chronology.docx
Inline-Images: image001.gif

Hi, Jim –

Thanks again for taking time to chat about your pending cases, and sharing the related reports and body cam footage. Can you also look into getting the related reports from the closed/disposed-of cases?

The applicable statute I mentioned is 18 USC 248(a)(1) (FACE Act). I believe that we would be considering the "physical obstruction" aspect of the statute.

The 11th Cir. has a pattern instruction for this offense, but it does not capture the "attempt," where the defendants' conduct did not successfully prevent any person from providing or receiving health care services (I'm sure we can craft something better).
https://www.ca11.uscourts.gov/sites/default/files/courtdocs/clk/FormCriminalPatternJuryInstruction.pdf

In addition to this email string that provides the case info for your pending matters, I've attached the related documents received from NAF.

Thanks.
Sanjay

From: McNally, James (USADC)
Sent: Thursday, September 10, 2020 3:01 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Sanjay – I'm free all day tomorrow and anytime next week will be OK. My number is [redacted]

Jim

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Thursday, September 10, 2020 2:57 PM
To: McNally, James (USADC) <[redacted]>
Cc: Cooney, Joseph (USADC) <[redacted]>; Willoughby Jr., Charles (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Thank you, Chip and J.P.
Jim – it would probably be best if we have a call about your active cases. Do you have time for a call tomorrow or next week?
Sanjay

From: McNally, James (USADC)
Sent: Thursday, September 10, 2020 2:24 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Cooney, Joseph (USADC) <[redacted]>; Willoughby Jr., Charles (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Mr. Patel,

I have the active [redacted], Moscinski, and [redacted] cases. What do you need?

Jim McNally

From: Willoughby Jr., Charles (USADC) <[redacted]>
Sent: Thursday, September 10, 2020 2:18 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Cooney, Joseph (USADC) <[redacted]>; McNally, James (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Good afternoon Sanjay,

Please forgive my delayed response. I told J.P. I would get this to the both of you last week and got a bit tied up. Per your inquiries, the following cases have been disposed of by conviction or dismissal and are likely among our closed case files, which we do not have access to at this time:

Lauren Handy ([redacted]) and [redacted] ([redacted]) were assigned to former SAUSA Kathryn Schmidt. The cases were dismissed for want of prosecution on 7/23/19.

[redacted] was assigned to former SAUSA Sarah Harper. The defendant was sentenced [redacted]

Christopher Moscinski ([redacted]) was assigned to former SAUSA Kathryn Schmidt. The case was dismissed for want of prosecution on 9/19/19.

Christopher Moscinski ([redacted]) was assigned to former SAUSA Danielle Rosborough. The case was dismissed for want of prosecution on 10/11/18.

The following cases are still active and are currently assigned to SAUSA Jim McNally, who I've copied here.

[redacted] ([redacted])
[redacted] ([redacted])
Christopher Moscinski ([redacted])
William Goodman ([redacted])

Please let me know if you have any questions and/or need anything else from me.

Thanks,

Chip

From: Cooney, Joseph (USADC) <[redacted]>
Sent: Thursday, September 10, 2020 1:31 PM
To: Patel, Sanjay (CRT) <[redacted]>

Cc: Willoughby Jr., Charles (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Thanks for the ping, Sanjay.

Chip, circling back to this – can you help us get access to the underlying case files/AUSAs?

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Thursday, September 10, 2020 12:19 PM
To: Cooney, Joseph (USADC) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Hi, J.P.,
Just following up on the potential DC FACE matters I had emailed you about.
Assuming these defendants have active cases in superior court, can you have the assigned AUSA(s) reach out to me?
Thanks.
Sanjay

From: Cooney, Joseph (USADC)
Sent: Tuesday, September 1, 2020 1:41 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: RE: Red Rose Rescue Info Requested

Thanks for this, Sanjay. I'm reaching out to my counterpart in Superior Court to find out where these are and will get you in touch. If we can take any of these federally under the FACE Act, we're all in help out.

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Tuesday, September 1, 2020 12:01 PM
To: Cooney, Joseph (USADC) <[redacted]>
Subject: FW: Red Rose Rescue Info Requested

Hi, J.P. –
Several pro-choice NGOs routinely reach out to me concerning possible FACE Act violations (18 USC 248(a)) that occur around the country.
Recently, in DC, there were MPD arrests related to conduct that occurred at local reproductive health clinics.
Below is case related information for some activists whom I've been monitoring over the past few years.
I believe that these cases are active in superior court.
If they are, can you connect me with the AUSA(s) handling these capers?
(I'm not sure whether the numbers below are case numbers, report numbers, or something else?)

Lauren Handy, [redacted], File Date 3/20/19
[redacted], [redacted], File Date 8/18/2020
([redacted], [redacted])
[redacted], [redacted], File Date 8/18/2020
Christopher Moscinski, [redacted], File Date 8/12/2020
([redacted], [redacted])
William Goodman, [redacted], File Date 8/12/2020

I'd like to take a look at the related reports.
I believe that at least two of these defendants have prior misdemeanor FACE Act convictions.
If any of these DC cases are potential FACE Act violations, then we may be able to charge those as a felony (sect 248(b)(2)).

Thanks.
Sanjay

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Thursday, August 20, 2020 4:27 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon [redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Re: Red Rose Rescue Info Requested

Here they are, Sanjay. Sent this morning.

From: Michelle Davidson
Sent: Tuesday, August 18, 2020 7:39:57 PM
To: [redacted]>
Cc: Tara Gannon [redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Red Rose Rescue Info Requested

Hi Sanjay,

Feel free to share this with Aaron as well. He replied to my previous email wanting to know if any action from Handy occurs. It might be useful for him to have the timeline as well. I also attached some articles on Moscinski that go pretty far back. Let me know if you need anything else. I'll definitely keep you posted if we hear of any attempts at clinics right away.

Case Numbers:
Lauren Handy, [redacted], File Date 3/20/19
[redacted], File Date 8/18/2020
([redacted])
[redacted], File Date 8/18/2020
Christopher Moscinski, [redacted], File Date 8/12/2020
([redacted])
William Goodman, [redacted], File Date 8/12/2020

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C: [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 072

From: duVergne Gaines <[redacted]@feminist.org>
To: "Patel, Sanjay (CRT)" <[redacted]>, "[redacted]@prochoice.org" [redacted]@prochoice.org>, Chiko Scozzafava <[redacted]@ppfa.org>
Cc: "Channapati, Anita (CRT)" <[redacted]>
Subject: [EXTERNAL] Re: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT
Date: Wed, 24 Jul 2024 14:51:33 -0400
Importance: Normal

Thank you, Sanjay.

This is excellent news. Grateful for the update and hard work behind the case.

duVergne

duVergne Gaines, JD
Director, National Clinic Access Project
Feminist Majority Foundation
O: [redacted]
C: [redacted]
E: [redacted]

The information contained in this electronic message and any attached documents are privileged, confidential and protected from disclosure, and the information may not necessarily express the opinion of Feminist Majority Foundation. If you are not the intended recipient, note that any review, disclosure, copying, or dissemination of this message or any attachments is strictly prohibited. If you think that you have received this message in error, please destroy it and notify the sender.

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Wednesday, July 24, 2024 11:43 AM
To: [redacted]@prochoice.org; duVergne Gaines; Chiko Scozzafava
Cc: Channapati, Anita (CRT)
Subject: FW: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

Chiko/Michelle/duVergne –
I hope this email finds you well.
Please see below press release concerning FACE Act defendant Bevelyn Williams.
Thank you,
SP

From: USANYS-PressOffice <[redacted]>
Sent: Wednesday, July 24, 2024 12:28 PM
Subject: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

PR Header

FOR IMMEDIATE RELEASE
Wednesday, July 24, 2024
http://www.justice.gov/usao/nys

CONTACT: U.S. ATTORNEY'S OFFICE
Nicholas Biase, Lauren Scarff,
Shelby Wratchford
[redacted]

TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

Damian Williams, the United States Attorney for the Southern District of New York, announced today that BEVELYN BEATTY WILLIAMS was sentenced to 41 months in prison for violating the Freedom of Access to Clinic Entrances Act (the "FACE Act") in June 2020 in connection with her interference, including by threats and force, with individuals seeking to obtain and provide lawful reproductive health services at a reproductive health center in Manhattan. On February 22, 2024, WILLIAMS was convicted after a nine-day jury trial of one count of violating the FACE Act before U.S. District Judge Jennifer L. Rochon, who imposed today's sentence.

U.S. Attorney Damian Williams said: "Bevelyn Beatty Williams repeatedly intimidated and interfered with individuals seeking and providing critical reproductive health services. She did so by physically blocking access to clinics, threatening staff, and by force. This Office and our law enforcement partners are committed to ensuring that patients exercising their legal right to obtain reproductive health services, and healthcare facilities and their staff providing those services, can do so without unlawful interference or fear of threats or violence."

According to evidence admitted at trial and other public filings and statements made in Court:

On June 19, 2020, and June 20, 2020, WILLIAMS threatened and used force against patients and staff members at a reproductive health center located in lower Manhattan (the "Health Center") and blocked patients and staff members from accessing the Health Center. In one instance, and as captured on video, WILLIAMS pressed her body against the door of the Health Center's patient entrance and refused to move, preventing a Health Center volunteer from entering the Health Center. As a Health Center staff member ("Victim-1") attempted to open the door for the volunteer, WILLIAMS purposefully leaned against the door, crushing Victim-1's hand. Victim-1 yelled, "She's crushing my hand," but WILLIAMS remained against the door, trapping Victim-1's hand and injuring it.

At various times on June 19 and 20, 2020, WILLIAMS stood directly in front of the Health Center entrances. WILLIAMS initially blocked the main entrance used by patients, causing the Health Center to have to divert patients to enter through the staff entrance. WILLIAMS responded by moving to block the staff entrance and directing others to do the same.

WILLIAMS livestreamed some of her conduct on June 19 and 20, 2020, on a social media account. On the livestream on June 19, 2020, WILLIAMS stood within inches of the Health Center's chief administrative officer and threatened to "terrorize this place" and warned that "we're gonna terrorize you so good, your business is gonna be over mama." Similarly, WILLIAMS stood within inches of a Health Center security officer and threatened "war." WILLIAMS also stated that she would act by "any means necessary."

In addition to WILLIAMS's conduct in Manhattan, on multiple other occasions from at least 2019 to 2022, WILLIAMS and others intimidated and interfered with individuals seeking to obtain or provide reproductive health services at other health clinics across the country, including in Florida, Tennessee, Georgia, and Brooklyn, New York. For example, in January 2022, WILLIAMS travelled to a health center in Fort Myers, Florida, where she directed other individuals to block health center entrances. As a result of the blockade, medical staff was delayed in treating at least a dozen patients, three of whom were scheduled for time-

sensitive procedures that could have resulted in bleeding, infection, or significant pain without timely treatment. In addition, in July 2022, WILLIAMS invaded a health center in Atlanta, Georgia, where she screamed through the door at patients attempting to enter the facility until they were forced to leave. Among other things, WILLIAMS shouted that she'd go to jail before letting patients enter the facility for an abortion and that she was "not afraid to get arrested."

* * *

In addition to the prison term, WILLIAMS, 33, of Ooltewah, Tennessee, was sentenced to two years of supervised release.

Mr. Williams praised the outstanding work of the Federal Bureau of Investigation.

The prosecution of this case is being handled by the Office's Civil Rights Unit in the Criminal Division. Assistant U.S. Attorneys Emily A. Johnson, Mitzi Steiner, and Jamie Bagliebter, with the assistance of Paralegal Specialist Isabel Loftus, are in charge of the prosecution.

24-255 ###

You have received this e-mail because you have asked to be notified of changes to the U.S. Attorney's Office for the Southern District of New York's website. GovDelivery is providing this service on behalf of the Executive Office for United States Attorneys, Department of Justice, 950 Pennsylvania Ave., NW - Washington, DC 20530 - 202-514-2000 and may not use your subscription information for any other purposes.

Manage your Subscriptions | Department of Justice Privacy Policy | GovDelivery Privacy Policy

Follow us on Facebook | Follow us on Twitter | Follow us on LinkedIn | SDNY Website

EXHIBIT 073

From: Michelle Davidson <[redacted]@prochoice.org>
To: "[redacted] (WF) (FBI)" <[redacted], "[redacted]" <[redacted], "[redacted] (FBI)" <[redacted]>, [redacted] (WF) (FBI)" <[redacted]>, "[redacted]" <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>, Emma Goldberg <[redacted]@prochoice.org>
Subject: US Capitol-Anti-Abortion Extremists Intel
Date: Fri, 08 Jan 2021 13:05:09 -0500
Importance: Normal
Inline-Images: image003.png

Good Afternoon Everyone,

I'm sure you are all extremely busy. I wanted to let you know that we are gathering and compiling a lot of video and intel from Wednesday's events at the Capitol. The Abortion Access Front is a partner organization that we work with often and they have also gathered a large amount of video that we would like to share with you.

The March for Life is scheduled for January 29th and we are very concerned that the individuals that participated in the invasion at the Capitol will continue similar actions at this event. I'm not sure what can be done without rights to gather coming into play but because of the severity of the events, and the growing concerns that these types of extremists now pose an even greater threat to Homeland Security than FTO's, we wanted to hear your thoughts and provide as much information to you as possible. This is something that we deal with in our field regularly and the escalation is not surprising.

Clinics are expressing concern and are on high alert and we continue to field calls and support them. We will create a drop box link to the information we have so far and will continue to upload items as both our organizations find them. Let me know if there is one of you in particular that I can direct these to or if you all are interested. The downloads will take some time but we will send them as soon as they are ready.

Stay safe all,
Michelle

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C:[redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 074

From: Tara Gannon <[redacted]@prochoice.org>
To: "[redacted] (WF) (FBI)" <[redacted]>, Michelle Davidson <[redacted]@prochoice.org>, "[redacted] (WF) (FBI)" <[redacted]>, "[redacted] (WF) (FBI)" <[redacted]>, "[redacted]. (WF) (FBI)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>
Cc: Emma Goldberg <[redacted]@prochoice.org>
Subject: RE: US Capitol-Anti-Abortion Extremists Intel
Date: Tue, 12 Jan 2021 14:59:18 -0500
Importance: Normal
Attachments: Anti_Abortion_Insurrectionists_at_US_Capitol_Overview.docx
Inline-Images: image002.jpg; image004.png

Thank you, SA [redacted]. We have uploaded several videos to the link you provided, however; some were not able to upload. We received error messages. In the attached word document, we have added the names of our well known antis present last Wednesday. Under each name, we provided social media links showing some of them climbing the wall. We also provided statements made throughout the videos with the time mark stamp. Some of these individuals have been arrested several times for abortion related violence and disruption to include stalking, assault, blocking a clinic entrance, etc [redacted], the [redacted] who resigned last week, regularly protests at a member clinic [redacted] confessed to setting fire to an abortion clinic and plotting to later bomb the clinic. He served time in federal prison.

The majority of these folks plan to return to DC on Jan 20th and again on Jan 29th for the annual March for Life event.

Thank you all so much for your continued support.

Tara Gannon
Senior Director, Security
National Abortion Federation

(T) [redacted]
(E) [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

From: [redacted] (WF)(FBI) <[redacted]>
Sent: Friday, January 8, 2021 1:11 PM
To: Michelle Davidson <[redacted]@prochoice.org>; [redacted] (WF) (FBI) <[redacted]>; [redacted] (WF) (FBI)" <[redacted]>; [redacted]. (WF) (FBI)" <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Re: US Capitol-Anti-Abortion Extremists Intel

Michelle,

Thank you very much for your continued support.
In an effort to streamline all the tips we've been getting, we are asking everyone to report information such as this to the tip line. You can continue sending these to us, but let us know that the information has also been reported to the tip line:

http://www.fbi.gov/USCapitol. Individuals may also call 1-800-CALL-FBI (1-800-225-5324) to verbally report tips and/or information related to this investigation.

I cannot thank you enough for your continued assistance and partnership.

Sincerely,

SA [redacted]
Washington Field Office
[redacted]

SA [redacted]

FBI Washington Field Office
[redacted]

From: Michelle Davidson [redacted]@prochoice.org>
Sent: Friday, January 8, 2021 1:05 PM
To: [redacted] (WF)(FBI) <[redacted]>; [redacted] (WF)(FBI) <[redacted]>; [redacted] (WF) (FBI) <[redacted]>; [redacted] (WF) (FBI) <[redacted]>; 'Patel, Sanjay (CRT)' <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: [EXTERNAL EMAIL] - US Capitol-Anti-Abortion Extremists Intel

Good Afternoon Everyone,

I'm sure you are all extremely busy. I wanted to let you know that we are gathering and compiling a lot of video and intel from Wednesday's events at the Capitol. The Abortion Access Front is a partner organization that we work with often and they have also gathered a large amount of video that we would like to share with you.

The March for Life is scheduled for January 29th and we are very concerned that the individuals that participated in the invasion at the Capitol will continue similar actions at this event. I'm not sure what can be done without rights to gather coming into play but because of the severity of the events, and the growing concerns that these types of extremists now pose an even greater threat to Homeland Security than FTO's, we wanted to hear your thoughts and provide as much information to you as possible. This is something that we deal with in our field regularly and the escalation is not surprising.

Clinics are expressing concern and are on high alert and we continue to field calls and support them. We will create a drop box link to the information we have so far and will continue to upload items as both our organizations find them. Let me know if there is one of you in particular that I can direct these to or if you all are interested. The downloads will take some time but we will send them as soon as they are ready.

Stay safe all,
Michelle

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
[redacted]
O/C: [redacted]



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 075

People of Interest on site during the storming of the Capitol Building:

- [redacted]
  - Host of [redacted], Founder [redacted], also runs a survivalist training camp in Ohio
  - Video of him [redacted]
  - Video of him, [redacted]
- [redacted]
  - [redacted] Salt and Light Brigade, OSA
  - Extensive coverage of [redacted] in Ohio
  - Recorded many videos on site at Capitol with [redacted], [redacted]
- [redacted]
  - [redacted] on camera with [redacted] and [redacted]
  - On video at Capitol, 2:40 saying "You have two weeks to get ready… then its on. We are not coming back to normal"
- Bevelyn Beatty
  - At the Well Ministries, Love Life
  - Several previous incidents with police at clinics around the country, including painting over the BLM mural at Trump Tower
  - Video of her recap after the Capitol attack, saying we are headed for civil war at 2:50
    - 4:20 talking about "[redacted] who lives in the back woods who's been training all his life" and how patriots are pissed and it's not Antifa
    - 4:55 "Civil War is definitely a prominent thing that is coming to pass"
- Jason Storms
  - Asst. Director of Operation Save America, Founder of [redacted]
  - Video of him [redacted]
- [redacted]
  - Founder of [redacted]
  - Video of him next to the woman who was shot in the Capitol
  -
- [redacted]
  - [redacted], associated with Army of God, Operation Save America, Missionaries to the Preborn/Defy Tyrants
  - Video of him [redacted]
- [redacted]
  - Founder of [redacted] works with Operation Save America
  - [redacted] personal Capitol Video
  - [redacted] Capitol Video 1
  - [redacted] Capitol Video 2
  - [redacted] Capitol Video 3
  - Recap Video
    - Promises to post more from inside on [redacted] page by Friday
- [redacted]

- [redacted] State Senator, associate of Operation Save America
  - Video of him, claiming to be with several other senators, in front of the Capitol
- [redacted]
  - Associate of Missionaries to the Preborn/Defy Tyrants, Operation Save America
- [redacted]
  - [redacted]
  - He posted a video showing him going in there, but then took it down - per NYT

People of Interest on site for the Trump Rally prior to the storming of the Capitol:

- [redacted]
  - Regular Speaker at the March for Life
- [redacted]
- [redacted]
  - OSA Associate
- [redacted]
- [redacted]

Offsite people of interest who were supporting the storming of the Capitol Building

- [redacted]
  - [redacted] of Operation Save America
- [redacted]
  - [redacted] Missionaries to the Preborn/Defy Tyrants, Associate of Operation Save America
  - EXTENSIVE comment thread advocating for a civil war
- [redacted]
- [redacted]
  - Author of [redacted]

Offsite people of interest who were supporting the Trump rally prior to the Storming of the Capitol:

- [redacted]
  - Founder of [redacted], regular speaker at the March For Life
  - Several posts supporting the raid, refusing to acknowledge Biden as president, saying we have started a civil war
- [redacted]
  - Founder of [redacted], regular participant in the March for Life
  - Initial posts supported the police, later posts denounced the violence
- [redacted]
  - Video of her interviewing [redacted] during the capitol storming

EXHIBIT 076

From: "Mody, Saeed (CRT)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>, "Fitzgerald, Paige (CRT)" <[redacted]>
Subject: RE: US Capitol-Anti-Abortion Extremists Intel
Date: Fri, 08 Jan 2021 16:36:39 -0500
Importance: Normal
Inline-Images: image001.png

Let me check with J.P. to see who in FBI he's coordinating with. I don't think it's the civil rights folks.

From: Patel, Sanjay (CRT)
Sent: Friday, January 8, 2021 4:33 PM
To: Fitzgerald, Paige (CRT) <[redacted]>; Mody, Saeed (CRT) <[redacted]>
Subject: FW: US Capitol-Anti-Abortion Extremists Intel

Just a heads up that NAF is the process of collecting videos from their sources concerning Wednesday.
They will share them with DOJ (CRT and FBI) once they have completed collecting the videos.
Much of it involves individuals they have been following who are involved with the upcoming March For Life protest/rally scheduled for Jan 29 in DC.
Many of them were apparently involved in Wednesday's events.

Saeed – do you want me to pass this along to Randy at FBI-HQ?

SP

From: Michelle Davidson [redacted]@prochoice.org>
Sent: Friday, January 8, 2021 1:05 PM
To: [redacted] (WF) (FBI) <[redacted]>; [redacted]; [redacted] (WF) (FBI) <[redacted]>; [redacted] (WF) (FBI) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: US Capitol-Anti-Abortion Extremists Intel

Good Afternoon Everyone,

I'm sure you are all extremely busy. I wanted to let you know that we are gathering and compiling a lot of video and intel from Wednesday's events at the Capitol. The Abortion Access Front is a partner organization that we work with often and they have also gathered a large amount of video that we would like to share with you.

The March for Life is scheduled for January 29th and we are very concerned that the individuals that participated in the invasion at the Capitol will continue similar actions at this event. I'm not sure what can be done without rights to gather coming into play but because of the severity of the events, and the growing concerns that these types of extremists now pose an even greater threat to Homeland Security than FTO's, we wanted to hear your thoughts and provide as much information to you as possible. This is something that we deal with in our field regularly and the escalation is not surprising.

Clinics are expressing concern and are on high alert and we continue to field calls and support them. We will create a drop box link to the information we have so far and will continue to upload items as both our organizations find them. Let me know if there is one of you in particular that I can direct these to or if you all are interested. The downloads will take some time but we will send them as soon as they are ready.

Stay safe all,
Michelle

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C: [redacted]



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 077

From: "Fitzgerald, Paige (CRT)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Cc: "Mody, Saeed (CRT)" <[redacted]>
Subject: GJ_memo_DC_FACE_Draft chopped
Date: Fri, 08 Jan 2021 17:36:40 -0500
Importance: Normal
Attachments: GJ_memo_DC_FACE_Draft_chopped.docx

Hi, Sanjay"–

This is a great case to be bringing now – the FACE Act was enacted in part to deal with these kinds of obstructions, and has been effective in essentially wiping them out, so we should make sure that the extremists know that we still have this tool and will use it.

The memo is very well done, but it is way longer than necessary for a GJ auth memo. Your intro is fantastic – I was essentially ready to approve after reading that. After that, it reads much more like an indictment memo, especially the legal analysis part. I whittled it down a bit in places, and would like you to revisit the legal analysis part to shorten it considerably. You can keep all of this for the indictment memo, but I try to keep our GJ memos for Robert to around 5-7 pages unless there is a particularly complicated issue. Let's at least get this down to no more than 10.

That said, you already have almost everything you need for the eventual indictment memo, and your analysis is right on point. Looks like a really strong case, and one we can bring quickly.

Thanks!

- Paige

EXHIBIT 078

From: [redacted] <[redacted]>
To: "[redacted]" <[redacted]>, "[redacted]" <[redacted]>
Subject: FW: **Exempt** INTEL - FT Myers PP
Date: Fri, 28 Jan 2022 13:48:49 -0500
Importance: Normal
Attachments: GSS_Intelligence_Briefing_●SA[redacted]pdf; GSS_Advisory_[redacted]_organizingsfor_health_center_invasions_1.2022.pdf; 20220122_GSS_Advisory_PP_Invasion_in_Ft_Myers_FL.pdf; screencapture-protestchildkilling-campaign-toend-childkilling-in-florida-2022-01-28-09_47_18.png

---

Please see attached and below.

We are getting the surveillance video from the Planned Parenthood facility. We should have it on Monday.

From: [redacted] <[redacted]@sheriffleefl.org>
Sent: Friday, January 28, 2022 12:48 PM
To: [redacted](TP) (FBI)"<[redacted]>
Subject: [EXTERNAL EMAIL] - FW: **Exempt** INTEL - FT Myers PP

Fyi
They left for the day in these vehicles.
[redacted] tagn[redacted]
[redacted] tag [redacted]
[redacted] Tag[redacted]

[redacted] **Sergeant**
Desk:[redacted]
Narcotics
Lee County Sheriff's Office
[redacted] | www.sheriffleefl.org

From:'[redacted]<[redacted]@sheriffleefl.org>
Sent: Friday, January 28, 2022 12:20 PM
To: [redacted]<[redacted]@sheriffleefl.org>
Subject: FW: **Exempt** INTEL - FT Myers PP

This might have some good info for you!

[redacted] | **Criminal Invest. Assistant**
Desk: [redacted] | Cell: [redacted]
Real Time Intel Center Analyst
Lee County Sheriff's Office
[redacted]@sheriffleefl.org | www.sheriffleefl.org

From: [redacted]
Sent: Friday, January 28, 2022 10:53 AM
To: [redacted]<[redacted]@sheriffleefl.org>
Subject: FW: **Exempt** INTEL - FT Myers PP

Can you please review the attachments regarding future Planned Parenthood protests and add it to the RFI. Please create an Bulletin for forward to the possibly affected areas.

[redacted]

IMPORTANT MESSAGE
This message is intended for the use of the person or entity to whom it is addressed and may contain information that is privileged and confidential, the disclosure of which is governed by applicable law. If the reader of this email is not the intended recipient or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this information is STRICTLY PROHIBITED. If you have received this email by error, please notify us immediately and destroy the related message. This footnote also confirms that this email message has been swept for the presence of computer viruses, worms, hostile scripts and other email-borne network threats. PLEASE NOTE: Florida has a very broad public records law. Most written communications to or from government officials are public records available to the public and media upon request. Your email communications may be subject to public disclosure per Sec. 119 F.S.

[redacted] | **Sergeant**
Desk: [redacted]
Intelligence
Lee County Sheriff's Office
[redacted]@sheriffleefl.org | www.sheriffleefl.org

From: Davis, Alicia <[redacted]s@ppfa.org>
Sent: Friday, January 28, 2022 10:02 AM
To: [redacted]@sheriffleefl.org>; [redacted]@sheriffleefl.org>
Cc: Krumwiede, Steven <s[redacted]@ppswcf.org>; Clark, Chris <[redacted]@ppswcf.org>; [redacted] <[redacted]@ppsenfl.org>
Subject: **Exempt** INTEL- FT Myers PP

CAUTION: This email originated from outside of the **Lee County Sheriff's Office**. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Sgt. [redacted] and Detective [redacted].

Thank you again for all of your support yesterday. I apologize this email is a day late, but as you all know, our management was seeking an advisory on my end, so I had to push this out. This is the second PP this month that has been targeted by protesters conducting a blockade in my region, so I have been slammed.

As I promised you Sgt., yesterday's group is associated with Operation Save America (OSA), a well-known anti-abortion extremist group. A majority of the protesters today are out-of-state and came to this health center specifically to conduct this blockade. The minors involved are all children of these longtime extremists. This is the second blockade that we have seen that has involved their kids. OSA recently changed leaders, currently under Jason Storms, so we are watching closely to see where he takes this group.

I have attached the advisory that I pushed out to my side of the house for yesterday, along with an OSA Intel briefing to give you some background on OSA.

I will be sending a second email with the profiles on these subjects arrested as this isn't their first arrest, and it won't be their last. Cal Zastrow, Chet Gallagher, [redacted], and Eva Zastrow have been arrested numerous times for conducting blockades since we started our unit in 2017. The elders, like [redacted] have had previously FACE Act charges, but for some reason, the authorities have been dropped.

What can we do to push FACE Act charges again for those involved with incidents and any future incidents?
This was a well-organized blockade, likely organized by [redacted] and his wife [redacted] as they are the local OSA connection.

Secondly, as you know, we recently had another extremist, [redacted] move to Holly Hill, FL, and he has warned that he will be conducting an invasion in FL and is recruiting opposition to get involved. I have attached that advisory o[redacted] warning. He will be at PP Ft Myers tonight at 6 pm and tomorrow morning. We have seen in recruiting FL antis to get involved with the anti-abortion movement.

Thank you.

Stand by for a second email.

Intelligence Sensitive Information. Do Not Disseminate Information***

Respectfully,

[redacted]
Intelligence Analyst - Region III
Affiliate Regional Intelligence Program
Global Safety and Security
Planned Parenthood Federation of America
[redacted]
Cell: [redacted]

Security Operations Center: [redacted]
[redacted]

This e-mail is for the sole use of the intended recipient(s) and contains information which is confidential and/or legally privileged. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or taking of any action in reliance on the contents of this e-mail information is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and destroy all copies of the original message.

EXHIBIT 079

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

TO: Affiliate Security Leaders

FROM: Global Safety and Security, Intelligence and Investigations

SUBJECT: Operation Save America Intelligence Briefing

DATE: March 22, 2021

THIS INFORMATION IS SENSITIVE
DO NOT DISSEMINATE WITHOUT PRIOR APPROVAL

Executive Summary: ***Operation Save America (OSA) is one of the most prominent opposition groups currently active in the United States. While its budget, social media reach, and number of active volunteers are small compared with more "mainstream" national organizations, OSA's hardline protest tactics—including graphic signs, megaphones, inflammatory rhetoric, and in some cases civil disobedience—substantially increase the group's ability to disrupt operations and threaten the security of patients and staff. This is especially true when OSA gathers large numbers of followers for national and regional conferences.***

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Contents

Executive Summary 1

History 3

Current Structure and Philosophies 4

Current Tactics and Strategies 4
- Leadership Events and Conferences 5
- Legislative Lobbying 6
- Civil Disobedience 7

Current Leadership 8
- President – Reverend [redacted] 8
- Assistant Director – Jason Storms 8
- Administrative Director and Police Liaison – Chet Gallagher 8
- Other Notable Leaders/Members 9

Chapters and Factions 9

Affiliated Groups 10

Organizational Forecast 10
- Media Campaigns Against Patients and Supporters 11
- Strategic Abortion Provider Targeting 11

Endnotes 12

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

History

Operation Save America (OSA) is a national organization that began as Operation Rescue (OR) in 1986. Founded by **Randall Terry**, Operation Rescue became infamous for using large groups of people to conduct blockades of the entrances of abortion providers. Between 1987 and 1990, thousands of activists were arrested for taking part in these demonstrations [1]. Some blockades lasted for days, often shutting down health services in those locations. OR also created "Wanted" posters featuring the photos, names, and addresses of abortion providers [2].



Mounting legal problems ultimately forced Terry to shut down Operation Rescue, though much of the organization's membership and operations continued under the name Operation Rescue National (ORN), led by [redacted]. At this time, a number of regional splinter groups existed as well, including Operation Rescue West (ORW).

In 1999, ORN fought—and lost—a legal battle with ORW over rights to the "Operation Rescue" name. ORN's then-director [redacted] subsequently rebranded the group as Operation Save America. ORW took over the Operation Rescue name and continues to operate as a separate group headed by [redacted].

In 2014, [redacted] appointed [redacted] to succeed him as OSA's leader. In January 2021, it was announced **Jason Storms** would be replacing [redacted] as the leader of OSA in June 2021e

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

Current Structure and Philosophies

Operation Save America remains a loose coalition of evangelicals and non-denominational Christians. Although the organization is registered in Florida, its leader [redacted]' home is in [redacted] TX and serves as its de facto base of operations [3]. The number of official members is unknown, but OSA's Facebook account has over 21 thousand followers. While the group often refers to individuals as regional leaders, these titles may often be honorary: exact regions or responsibilities appear to be rather nebulous. There are also several local chapters that are run semi-independently under the OSA theosophical umbrella. OSA affiliates and supporters are often also involved with other anti-abortion groups.

OSA's primary focus is on ending abortion. It asserts that human life begins at fertilization, and its leaders advocate for making abortion legally the same as murder [4]. The group is also anti-LGBTQ and anti-Muslim. [redacted] and others have claimed that all the social, political, and environmental problems facing the United States are God's judgement (punishment) for allowing "the sin of abortion."

OSA asserts that there are three levels of government: family, church, and civil. One of its core doctrines is that God's law surpasses civil law, and OSA members therefore feel a duty to obey God's law—as they see it—over any law passed by humans (see Doctrine of the Lesser Magistrates under Legislative Advocacy).

Current Tactics and Strategies

Operation Save America is known for its antagonistic approach—loud protests, inflammatory rhetoric, and large, graphic signs are typical features of an OSA demonstration. Aside from abortion providers, the group often targets schools, shopping centers, city squares, LGBTQ events, and religious congregations. From a secular

perspective, such tactics have the advantage (for OSA) of generating greater public attention and potentially intimidating those it has targeted for harassment.

However, GSS assesses that OSA members view their efforts first and foremost as fighting a spiritual war between God and the devil. They believe that Planned Parenthood and other abortion providers are controlled by demonic forces, and they often refer to health center protests as "storming the Gates of Hell." They believe it is their God-given duty to fight abortion primarily by 1) preaching the Gospel to non-believers,[a] 2) dissuading potential abortion patients, and 3) fervent prayer. They believe God will end abortion only when a critical mass of people has adopted OSA's theology and approach.

Because OSA members consider their anti-abortion demonstrations an act of obedience to God, GSS assesses that worldly concerns like media attention are secondary to the group's tactical decision-making. While they have some concern for legal consequences insofar as they might impinge on their capacity for continued activism, members have periodically been willing to risk arrest when it suited their purposes.

In recent years, OSA's efforts have been primarily directed toward protests—often carried out during its national and regional conferences—and lobbying for legislation that would ban all abortion without exception.

Leadership Events and Conferences

OSA hosts several regional and national events each year. Their largest event is the national conference, which occurs in a different city each summer. This event attracts between 100-250 participants. Protests at abortion providers are a staple of the event. Participants usually break up into teams to target several facilities at once. OSA will hold the 2021 national event in Phoenix, Arizona.

[a] Including any self-professing Christians who are not actively campaigning against abortion.

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

Legislative Lobbying

Many anti-abortion organizations have pushed for laws restricting abortion, both for their immediate effect and in hopes of setting up a legal challenge that would overturn Roe. However, OSA is firmly opposed to that approach for two reasons. First, it argues that laws merely restricting abortion imply that the procedure is acceptable under certain circumstances. Second, the idea that Roe must be overturned undermines OSA's assertion that Roe was an illegitimate ruling to begin with.

OSA is a proponent of the so-called "Doctrine of the Lesser Magistrates," which asserts that local and state government officials have a duty to disobey laws—and Supreme Court rulings—they regard as antithetical to the laws of God. As a result, OSA often lobbies local and state authorities to "ignore Roe" and act as though abortion were legally the same as murder. The group also lobbies for new state laws that would ban abortion without exception.

[redacted] Wish is one of OSA's most advertised legislative campaigns. The campaign is named for [redacted], one of [redacted] sons. [redacted] was diagnosed with cancer at the age of16. His dying wish was to abolish abortion in Texas. This wish spread through social media and resulted in [redacted] having a personal phone call with Texas Governor Greg Abbott. During that call, Governor Abbott told[redacted] his wish was granted, as the Republican Party would pursue legislation outlawing abortion during the 2019 Texas legislative session. [redacted] passed away prior to the legislative session and the session ultimately did not end with abortion becoming illegal. As a result, [redacted] Wish remains an active campaign to make Governor Abbott "keep his promise". The campaign features emotional videos and photographs of [redacted] as his health deteriorated and calls for people to make [redacted] short life meaningful by signing a petition to Governor Abbott. When people sign the petition, they are also signing up to receive emails on additional action they can take to outlaw abortion [5]. Recently, OSA has supported the "Sanctuary City for the Unborn" movement in which small towns pass laws that criminalize abortion. Of note is the city of Waskom, Texas,

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

which passed an ordinance in June 2019, that not only completely outlawed abortion procedures, but also any material support lent in support of abortions. The ordinance declared Planned Parenthood and several other organizations that perform or facilitate abortions to be criminal organizations. Two days prior to the city council vote, OSA's [redacted] and [redacted] delivered sermons at a church in Waskom as a way to garner support for the ordinance. [redacted] went on to speak at the city council meeting and told his social media followers, "Please pray as we work with both church and state leaders to build a sanctuary city for the preborn. May our Lord be pleased to establish a precedent that other cities, counties, and states can follow. Time to ignore Roe, establish justice, and abolish abortion now in Jesus' name!" (6). [redacted] is currently acting as the head of this movement in the State of Texas and surrounding areas.

Civil Disobedience

In May 2017, OSA organized a blockade of the [redacted] in Louisville, Kentucky. [redacted] and ten others were ultimately arrested (7). During the most recent OSA national event, [redacted] praised those who have been arrested for conducting "rescues" in the past and encouraged young people to follow in their footsteps (8). In what appears to be an attempt to revisit the organization's roots, [redacted] has been pushing a message that personal sacrifices must be made in the fight against abortion.



In August 2020, OSA leader **Cal Zastrow** organized a blockade at [redacted] in Sterling Heights, Michigan. The blockade was publicly applauded by [redacted], although it is unknown if he was involved with the planning of the event. This

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

blockade marked the beginning of a reemergence of OSA sanctioned blockades, all of which have been led by Zastrow and **Coleman Boyd.** In 2021, blockades occurred at [redacted] in Little Rock, Arkansas, and [redacted] in Mt. Juliet, Tennessee.

Current Leadership

President – [redacted]



[redacted], of [redacted] became the president of OSA in July 2014. Prior to his affiliation with OSA, he was an evangelical preacher who ran [redacted], which is still active and generated $165,805 in revenue in 2018 [9]. He studied acting in college, and his sermons tend to be boisterous, theatrical, and militant. [redacted] He has 13 children, many of whom are also involved with OSA.

Assistant Director – Jason Storms



Jason Storms, of [redacted], became Assistant Director in February 2018. Storms will become the OSA president in June 2021. He is married to [redacted], the daughter of [redacted] of Missionaries to the Preborn. Storms does not believe that violence as a tactic is inherently wrong but feels it would be counterproductive to the anti-abortion movement. [redacted].

Administrative Director and Police Liaison – Chet Gallagher

Chet Gallagher, of [redacted], is a former [redacted] Police Officer who was [redacted]. He has been [redacted]

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.



[redacted] for anti-abortion protest activities and has participated in recent blockades.

Other Notable Leaders/Members

- [redacted] – *Arkansas*
- [redacted] – *Wisconsin*
- [redacted] – *North Carolina*
- [redacted] – *Texas*
- [redacted] – *Texas*
- [redacted] – *Indiana*
- [redacted] – *Indiana*
- [redacted] – *North Carolina*
- [redacted] – *Oklahoma*
- **Coleman Boyd** - *Mississippi*
- **Derin Stidd** – *Indiana*
- [redacted] - *Indiana*
- [redacted] - *Indiana*
- **Cal Zastrow** – *Michigan*
- [redacted] – *Louisiana*
- [redacted] – *Florida*

GSS notes that although OSA's official position is that men should be the leaders in the home, church, and state and women should be helpers, nurturers, child-bearers, and homemakersi[4], the group does have many women who take on subservient roles during campaigns but are leaders behind the scenes. For example, [redacted], the wife of [redacted], does not hold a formal leadership title within OSA, but is often responsible for behind the scenes operations.

Chapters and Factions

Several people associated with Operation Save America have created local chapters to organize their efforts on a smaller scale. Some of the known chapters are:

- Operation Save Chicago
- Operation Save Waco
- Operation Save Phoenix
- Operation Save Kansas City

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

- Operation Save Pakistan
- Operation Save Charlotte
- Operation Save Ashville
- Operation Save Spokane
- Operation Save Central Florida
- Operation Save Jacksonville
- Operation Save Little Rock
- Operation Save Mexico

Affiliated Groups

Operation Save America is known to work with and/or support the following organizations:

- Abolish Human Abortion
- Apologia Church (and Apologia Studios)
- Missionaries to the Preborn

GSS notes that membership in these organizations is informal, and OSA is so closely associated with both Abolish Human Abortion and Missionaries to the Preborn (MttP) that there is almost no significant difference beyond who is ostensibly leading the action. Superficial differences include distinctly branded clothing and accessories, distinctly branded propaganda, and separate—but often connecting—websites. OSA is older than AHA, and most of its core members have either historical or family connections to the group.

Apologia Church has a much shorter history of working with OSA, but their level of collaboration appears to be growing. Apologia Church is hosting the 2021 OSA national conference.

Organizational Forecast

OSA has never been able to muster anywhere near the number of activists who once participated in the blockades organized by Operation Rescue under the leadership of Randall Terry. Part of this is due to the proliferation of anti-abortion organizations that

have emerged since the late 1990's. Activists now have several options to choose from and may align themselves primarily with local groups, but participate with national organizations, such as OSA, when there is a local event. Even with the decline in active members, OSA remains one of the most prominent opposition groups in the United States. OSA still has the ability to amass large crowds that can disrupt health services and threaten the security of both abortion providers and patients. Furthermore, the group's virtual merger with AHA means that its leaders—[redacted], Storms, Gallagher, and others—will continue to have influence over a growing number of hardline activists, whether those activists consider themselves to be OSA, AHA, or another ideologically aligned group.

Media Campaigns Against Patients and Supporters

Operation Save America states on its website that "we are working on a Kingdom Warehouse website called #notavictim for the abolition movement to dispel the myth of the 'second victim' narrative promoted by the pro-life movement." The goal of this campaign is to challenge the narrative often promoted by other anti-abortion groups that a woman having an abortion is a "second victim" along with the aborted embryo or fetus. To that end, OSA is soliciting "testimonies" from women who will describe themselves not as victims but repentant murderers redeemed by Jesus Christ [j]. [redacted] (legal name [redacted] of [redacted] TX, is provided as the point of contact for women volunteering their testimonies. OSA also uses the #notavictim hashtag on social media to share content that they feel advances the narrative that women who have abortions are murderers, not victims. Ultimately, the group hopes this campaign will lead to the criminalization of all abortion, with legal penalties both for the people who have abortions and those who provide them.

Strategic Abortion Provider Targeting

In 2012, OSA launched the "States of Refuge" campaign to target physicians and clinics in states with only one abortion provider, including Mississippi, South Dakota, North

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

Dakota, Arkansas, Missouri, and Wyoming. During this campaign, OSA leaders organized to have a continual presence at abortion providers immediately following the 40 Days for Life Campaign, followed by "truth tours" and regional events [11]. The goal was to target the abortion industry at their "weakest and most vulnerable points" [12] to establish at least one abortion free state.

Although OSA has not published plans to conduct a campaign of similar nature, some of its messaging suggests this could be a future strategy. During the group's July 2019 national event in Wisconsin, OSA leaders repeatedly emphasized that Wisconsin only had three remaining abortion providers, and they called on young people to "complete the work." As new legislation restricts abortion access to fewer and fewer providers in many states, GSS assesses OSA may find new opportunities to single out specific providers for harassment.

This product was prepared by [redacted], Regional Intelligence Analyst and [redacted], Intelligence Research Specialist. Comments and queries can be addressed to Director[redacted] at [redacted]@ppfa.org or [redacted].

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

Endnotes

1. [Online] https://www.upi.com/Archives[redacted]
2. [Online] Feminist Majority Foundation. https://www.feminist.org/[redacted]
3. Report, 2019 Florida Not For Profit Corporation Annual. Florida Division of Corporations. *sunbiz.org*. [Online] [Cited: 08 20, 2019.] http://search.sunbiz.org[redacted]
4. Operation Save America About Us. *Operation Save America*. [Online] [Cited: 08 20, 2019.] http://www.operationsaveamerica.org/about_us/.
5. *https://[redacted]wish.org*. [Online]
6. Facebook. [Online] [redacted]
7. [Online] Feminist Majority Foundation. https://feminist.org/[redacted]
8. Facebook. [Online] https://www.facebook.com/[redacted]
9. [Online] IRS.gov. [redacted]
10. [Online] http://www.operationsaveamerica.org[redacted]
11. Schedule of Events. *www.statesofrefuge.org*. [Online] [Cited: 08 22, 2019.]
12. *http://[redacted]min.com/[redacted]*. [Online]

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

EXHIBIT 080

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

TO: [redacted], Director of Facilities and Security
Planned Parenthood of South, East, and North Florida

[redacted] Senior Director of Facilities and Security
Planned Parenthood of Southwest and Central Florida

FROM: Global Safety and Security, Intelligence and Investigations

SUBJECT: **Anti-abortion extremist [redacted] threatens to conduct a health center invasion in Florida**

DATE: January 7, 2022

Executive Summary: Anti-abortion extremist, [redacted], states he will organize and conduct a health center invasion in Florida in 2022.

Details: On January 5, 2022, Global Safety and Security (GSS) uncovered a Facebook video of an interview with well-known anti-abortion extremist [redacted]. The interview, hosted by [redacted] (AKA [redacted]) and [redacted] of Catholic Drivetime, discussed [redacted] involvement with what the opotion chooses to call "Red Rose Rescue" and the pro-life movement. [1][1]

During the 21-minute video interview, [redacted] promotes his agenda and mission. He encourages listeners to become more involved in protesting abortion by supporting non-violent direct action. He states that opposition members can become more involved by participating in a health center invasion or protesting outside a health center.

---

[1][1] Catholic Drivetime. Facebook video posted on December 16, 2021. Retrieved from Facebook on January 4, 2022 from https://www.facebook.com/[redacted]

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

[redacted] continuously expressed his distaste that Florida has 58 abortion health centers. By the end of the interview, [redacted] admits several times that he will conduct at least one health center invasion in Florida in 2022.

Analyst Notes: *GSS assesses [redacted] will follow through with his threat. He will plan, organize and facilitate a health center invasion within the upcoming months. GSS previously assessed that [redacted] recent move to Florida would result in him trying to organize anti-abortion opposition. In May 2020, [redacted] made several social media posts hinting he was moving his ministry to Florida. By September 2021, [redacted] moved to [redacted] Since his move, he has been aggressively attacking anti-abortion advocates online, pointing out their lack of organizing anti-abortion protests and their inability to shut down the 58 health centers in the state.*

GSS queried internal databases, subscription databases, and open-source databases for the most up-to-date information on [redacted]. Below is a combination of that data.

Name: [redacted]
AKA: Father [redacted]; [redacted]; [redacted]; "[redacted]"
Date of Birth: [redacted]
Address: [redacted]
Possible Phone Numbers: [redacted]; [redacted]; [redacted]
Vehicles: [redacted] license plate [redacted]; [redacted] license plate [redacted]
Opposition Association: Life Ministry US; Red Rose Rescue; On The Road for Life
Arrest History: [redacted]
Social Media:

- Facebook: www.facebook.com/[redacted]; www.facebook.com/[redacted]; www.facebook.com/[redacted]
- Instagram: https://www.instagram.com/[redacted]

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

- Twitter: https://twitter.com/[redacted]
- Website: [redacted]

GSS has documented several supporters for [redacted] located in Florida. Many of his supporters have been involved in anti-abortion protests. Some have participated in health center invasions, have conducted a similar version of a RRR, or have expressed a desire to participate in ahealth center invasion. Those protesters are [redacted] of [redacted]; [redacted]; [redacted]; [redacted] and [redacted].

- *In 2021, [redacted] traveled to Washington, DC, several times to participate in RRR.*
- *On May 16, 2020, [redacted], [redacted], and two unidentified female protesters did not invade the [redacted] ([redacted]) but did verbally harass patients and pass out red roses..*
- *On January 23, 2020, [redacted] posted a Facebook video admitting [redacted] and protester [redacted] attempted to enter a non-Planned Parenthood health center in Washington, DC.[2][2] The protesters went into the building where the health center was located and walked up the front door. The protesters were going to enter the lobby, but instead, they left religious pamphlets and anti-abortion material on the front door. [redacted] commented several times that [redacted] was surprised by the lack of security at the health center and how easy it was for them to gain access to the health center.*

[2][2] [redacted]. Facebook video posted on January 23, 2020. Retrieved from Facebook on January 5, 2022 from https://www.facebook.com/[redacted]

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

- *In May 2020, [redacted] expressed his desire to participate what he called a "Red Rose Rescue" with [redacted]. [redacted] has been working with [redacted] in organizing anti-abortion protests, The Men's March throughout the country.*

GSS assesses [redacted] will continue encouraging his followers and supporters to participate inhealth center invasions. Florida does not have a very organized anti-abortion network. Many of the anti-abortion organizations are small and very fragmented. GSS notes [redacted] does have the social media influence and outreach to potentially create a more organized network within the state.

Conclusion: [redacted] will conduct at least one health center invasion in Florida in the upcoming months. GSS cannot identify a date, time, or location due to limited information but will closely monitor [redacted] and his associates. GSS will monitor other key associates ([redacted], [redacted], [redacted], [redacted], Lauren Handy, and [redacted]) to document any traveling to the state.

GSS assesses that local opposition may conduct counter-surveillance and undercover surveillance to collect data for potential targets. Previous opposition counter-surveillace tactics include protesters posing as patients seeking abortion health care, posing as patient partners seeking abortion information, and posing as transgender patients seeking health services.

GSS recommends Affiliate Security Leaders (ASL) familiarize themselves with what the opposition has chosen to call "Red Rose Rescues" and their tactics, [redacted], and the local opposition that [redacted] associates with. ASLs should report any suspicious activity to GSS for further follow-up investigation.

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

[redacted] **Photos**





SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS



[redacted] license plate [redacted]



[redacted] license plate [redacted]

Florida RRR Supporters

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS



[redacted]



[redacted]



[redacted]



[redacted]

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS



[redacted]

[redacted] and [redacted]
Conducting Similar RRR at Non-Planned Parenthood in [redacted]





SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

[redacted] Red Rose Rescuers is feeling inspired

Wonderful news! Sidewalk counselors in Florida had 3 turn-aways yesterday after being inspired by last week's RRR missions in DC! Do good!

God bless you all

Report from [redacted]

"We were inspired by the video of [redacted] in the hallway of the Supreme and decided it was worth trying the roses to approach the abortion minded moms. We [redacted] them the night before and headed out to [redacted] which is about as notorious here as [redacted] is in DC. They do late term abortions there and it is usually very contentious. A couple of weeks ago one of the staff pushed one of our group members.

We were so surprised to see how willingly (they moms) took the flowers. It seemed to break the wall of hostility and defensiveness we see there.

We had one mom who seemed completely determined she is [redacted] had a one night stand after drinking too much... she was determined, saying she didn't care about the baby and didn't believe in God. She agreed to take the flower and some literature and then said no, can for a long time. She then went back into the mall, but quickly left. She smiled and said she was leaving and indeed left.

We then encountered a couple (always verbally abusive with each other. He was trying to prevent the abortion and she was using it to punish him since she discovered he was having a baby with another lady. It was crazy), at one point she was hitting him. We were able [illegible] and surrounding her (4 of us) to calm the situation before again it became hysterical. We were





SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

[redacted] and [redacted] March 2021



[redacted], [redacted], [redacted] Mach 2021



SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

[redacted] and[redacted] 2020



[redacted] and [redacted] – 2020



SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

[redacted] Social Media Posts





SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

This product was written by [redacted], Intelligence Analyst, Global Safety and Security, Intelligence and Investigations. Comments and queries can be addressed to [redacted] at [redacted] or [redacted].

ENDNOTES

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

EXHIBIT 081

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

TO: Affiliate Security Leaders

FROM: Global Safety and Security, Intelligence and Investigations

SUBJECT: Anti-abortion opposition carry out a blockade at a Planned Parenthood in [redacted], Florida

DATE: January 27, 2022

Executive Summary: On January 27, 2022, several Operation Save America (OSA) activists formed a blockade at the [redacted] in [redacted], Florida. [redacted] individuals were arrested.

Details: On January 27, 2022, at 8:15 a.m. EST, a large group of anti-abortion protesters began to gather in front of [redacted]). Protesters began to trespass onto the health center's property, where they started to harass patients and staff as they arrived. Planned Parenthood of [redacted] notified the Lee County Sheriff's Office (LCSO) to respond to the health center.

At 8:49 a.m., six anti-abortion protesters trespassed onto the property of the health center and approached the front door, where they attempted to enter the lobby. The group was unsuccessful in entering the health center due to the locked doors in the vestibule. The protesters left the building and went back to the street. The group of protesters was led by Operation Save America (OSA) associates Cal Zastrow and Chet Gallagher. [1] [2]

---

[1] Coleman Boyd Facebook. January 27, 2022. Retrieved on January 27, 2022 from https://www.facebook.com/[redacted]

[2] Coleman Boyd Facebook. January 27, 2022. Retrieved on January 27, 2022 from https://www.facebook.com/[redacted]

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

By 8:55 a.m., LCSO arrived on the scene to witness this same group of protesters trespassed onto the health center's property again, where protesters proceeded to sit down and block the front doors. Officers immediately begin to remove the protesters from the area and placed the under arrest.

During this incident occurring in the front of the building, four protesters walked to the rear doors of the health center. OSA associate [redacted] and Chet Gallagher blocked the rear doorway, resulting in their arrest.

LCSO Deputies arrested [redacted] protesters. GSS identified the arrestees as:

Cal Zastrow of Michigan
[redacted]
Chet Gallagher of Tennesse
[redacted] (minor)
Eva Zastrow
[redacted]
[redacted] (minor)
[redacted] (minor)
[redacted] (minor)

GSS has identified protesters that were standing by the street as:

Coleman Boyd
[redacted]
Bevelyn Beatty
Edmee Chavaness
Dennis Green
[redacted]

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Analyst Notes: *[redacted] recognition of unusual anti-abortion protesting activity and swift reporting to LSCO help alleviate the impact the invasion would have had on the [redacted] operation. GSS previously notified Florida Affiliate Security Leaders that Boyd and his team were in the northern part of Florida after protesting at a non-Planned Parenthood [redacted] in [redacted] GSS had no information or intelligence that Boyd was planning on an invasion or would protest at any Planned Parenthood health center but to be aware of any unusual activity. GSS notes this the first reported health center invasion in Florida.*

GSS assesses this invasion was a well-organized event that included a wide range of OSA and Abolish Human Abortion (AHA) protesters from Florida, Michigan, Mississippi, North Carolina, and Tennessee. GSS further assesses [redacted] and [redacted] are likely responsible for organizing this blockade. Leading up to this invasion, [redacted] have aggressively targeted this [redacted] by organizing protests to include harassing patients and staff, blocking driveway access, and encouraging protesters to trespass onto the property. [redacted] were previously charged [redacted], but the charges were ultimately dropped. LCSO noted to [redacted] that they would be pursuing different charges against [redacted] due to his previous arrests. GSS and [redacted] will be working with LCSO's intelligence unit to provide information to assist on possible FACE Act charges against this group.

Conclusion: Blockades conducted by OSA opposition and Red Rose Rescues are tactics used to cause a disruption that shut down health care facilities. The tactics are often in violation of the Freedom of Access to Clinic Entrances (FACE) Act.

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Photos provided by [redacted]



First Blockade Attempt



Second Blockade

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS



Second Blockade



Second Blockade

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Eva Zastrow's Arrest





SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Cal Zastrow's Arrest







SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

[redacted] **Rear Door Surveillance Video**



Bevelyn Beatty and Edmee Chaveness harassing [redacted] security



[redacted] and Chet Gallagher Arrest

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Opposition photos provided by [redacted]





SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Opposition photos provided by [redacted]



Eva Zastrow, [redacted], and [redacted]



Chet Gallagher, Cal Zastrow, and Dennis Green

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Opposition photos provided by [redacted]



SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Opposition Identified



Cal Zastrow



Coleman Boyd



Eva Zastrow



SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

Opposition Identified



Bevelyn Beatty



Edmee Chavaness



[redacted]



Dennis Green



[redacted]



[redacted]

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS



This product was written by [redacted] Intelligence Analyst, Global Safety and Security, Intelligence and Investigations. Comments and queries can be addressed to [redacted] at [redacted] or [redacted].

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.



PPFA GLOBAL SAFETY AND SECURITY
INTELLIGENCE AND INVESTIGATIONS

SENSITIVE INFORMATION//FOR INTERNAL USE ONLY
DO NOT DISSEMINATE WITHOUT PRIOR WRITTEN PERMISSION

The Affiliate Regional Intelligence Program (ARIP) is offered as a service to Planned Parenthood Affiliates to supplement their own security resources and programs. Planned Parenthood Affiliates are advised to rely on their own judgment as to the accuracy or significance of information received through the ARIP. Participation in ARIP is voluntary.

EXHIBIT 082

From: Michelle Davidson <[redacted]@prochoicc.org>
To: [redacted] <[redacted]>
Cc: Robert Ledogar <[redacted]@prochoice.org>, Eduardo Serrano <[redacted]@prochoice.org>, "Taskforce, Clinicviolence (CRT)" <[redacted]>, "Cowall, Laura (CRT)" <[redacted]>, "Katelyn Smith ([redacted])" <[redacted]>, "[redacted]@usdoj.gov" <[redacted]>, [redacted] <[redacted]>, "[redacted]" <[redacted]@usdoj.gov>
Subject: [EXTERNAL] Incidents in[redacted] - Bevelyn Beatty & Co/Contact info for Georgia Clinics
Date: Thu, 07 Jul 2022 18:34:51 -0400
Importance: Normal
Attachments: Beatty-Bevelyn-Dos.docx; 20220707-Williams_Bevelyn-[redacted]-PD_Report_Num.jpeg

---

Agent[redacted]

Bevelyn Williams, Edmee Chavennes, and Rickey Williams entered 3 facilities this morning and caused lock downs at at least 2 of them. [redacted] alerted me while they were still inside and I could hear them screaming in the background. Staff reported that they were afraid and very shaken by the incident. The 3 extremists (who are known to us) left before police arrived. [redacted], the admin at [redacted], reported that she was grabbed by one of the individuals and has filed assault charges. Attached is the police report number for that incident as well as a dossier on Bevelyn Williams (aka- Bevelyn Beatty).

Let me know if you need more information or if I can clarify anything.

NAF Member Facilities

[redacted] **Medical Associates**
[redacted] – Executive Director
Primary contact - [redacted] – Administrator
[redacted]
[redacted]
Incident FB live video:
https://fb.watch/[redacted]

[redacted] **Center**
[redacted] – Executive Director
[redacted]
[redacted] – Operations Manager
[redacted]

Incident FB Live video:
https://fb.watch[redacted]

[redacted] **Center,a**[redacted]
Clinic:[redacted]

[redacted] **Center,** [redacted]
Primary Contact for both facilitiese- [redacted]

[redacted] **Clinic** ([redacted]), [redacted]
Medical Director – [redacted]
[redacted] - Front Office Supervisor
[redacted]

[redacted] **Center,** [redacted]
1st/2nd contact - [redacted] – Chief Clinical Administrator
[redacted] – Medical Director
[redacted]
1st contact - [redacted] VP of Abortion Access/Security
[redacted]

[redacted]
[redacted] – COO
[redacted]
1st contact - [redacted] – Security Director
[redacted]

[redacted] **Health**
[redacted]
[redacted] – Clinic Manager
[redacted]
[redacted] – Medical Director (also works at [redacted])

[redacted] **Gynecology,** [redacted]
[redacted]
[redacted] – Medical Director
[redacted]
[redacted] – Facility Administrator
[redacted]

[redacted] **Medical Clinic,** [redacted]
[redacted]
[redacted]
[redacted]
[redacted] – Also listed under non NAF member clinic [redacted] OBGYN, PC
[redacted]
[redacted]

[redacted] **GYN,** [redacted]
[redacted]
[redacted] – CEO/Owner/Physician
[redacted]
[redacted] Office Manager

[redacted]

Non NAF Clinics

*I can't be certain of the accuracy of the info below but this is what we have on record-

[redacted] OBGYN, PC, [redacted]
[redacted]

[redacted]
*They didn't get in to this facility due to mask requirements but the comments above the post are concerning but not unusual for Beatty-Williams considering her history.
Incident Video- https://fb.watch/[redacted]
"Another clinic, Planned Parenthood will fall!!
Truly I say to you, whoever says to this mountain, 'Be taken up and cast into the sea,' and does not doubt in his heart, but believes that what he says is going to happen, it will be granted him. Therefore I say to you, all things for which you pray and ask, believe that you have received them, and they will be granted you."
Mark 11:23-24 NASB1995
"From the days of John the Baptist until now the kingdom of heaven suffers violence, and violent men take it by force.
Matthew 11:12 NASB1995"

[redacted]
[redacted]- VP Patient Services
[redacted]

[redacted] **Center**
[redacted]
[redacted] **Center**
[redacted]
[redacted] **Center**
[redacted]
[redacted] **Center**
[redacted]
[redacted]

From: [redacted] <[redacted]>
Sent: Friday, July 1, 2022 2:39 PM
To: Michelle Davidson <[redacted]@prochoice.org>
Subject: contact info.

Special Agent [redacted]
Cell- [redacted]
Desk- [redacted]

And please provide contact for [redacted] Medical Associates

EXHIBIT 083

Bevelyn Williams



Rickey Williams & Bevelyn Williams



Bevelyn Williams being arrested for defacing a Black Lives Matter mural in NYC

AKAs: Bevelyn Zakia Beatty, Bevlin, One of the "Dunamis sisters"
DOB: [redacted]
Last Known Address: [redacted]
Previous Addresses:
[redacted]
Phone Number: [redacted]
Website: At the Well Ministries

Social Media:

Facebook: [redacted]
Twitter: [redacted]
Instagram: [redacted]
LinkedIn: Unknown
YouTube: [redacted]

Description/Physical Appearance

[redacted]

Spouse/Family/Close Associates

Williams married Rickey Williams in [redacted] and has an infant [redacted]. She is close associates with [redacted]. She is often accompanied by her husband and Edmee Chavannes when engaging in obstructive activities at clinics.

Major Known Areas of Travel

Williams travels nationwide and globally with At the Well Ministries

Affiliated Groups

At the Well Ministries
Operation Save America

Arrests

[redacted]

Activities and Other Info

Williams writes blogposts about evangelizing and protesting abortion on The Well Diary.

Williams is known to hire [redacted]

July 7th, 2022: Bevelyn and Rickey Williams along with Edme Chavennes entered three abortion facilities in Atlanta, GA consecutively, screaming at staff and causing the clinics to lock down.

They live streamed the invasions and grabbed one staff member during one incident. They left each of the clinics before police arrived.

Starting in January 2021, Bevelyn Williams, Rickey Williams, and Edme Chavennes traveled to different cities across the country as part of an At the Well Ministries "Iron Sharpens Iron" tour.

January 6th, 2021: Attended the U.S. Capital insurrection with [redacted]

February 9, 2021: New York Attorney General Letitia James brought a lawsuit against Williams and Chavannes to prevent them from entering a buffer zone around [redacted] Center. Beatty allegedly made the following statement at the time of her arrest – "**We are going to terrorize you so good that your business will be over, Mama. We are violently pursuing the kingdom of God. Violently pursuing.**"

January 29-30, 2021: Williams was a featured speaker at the Lubbock, TX March for Life.

July 13 – 20, 2019: Williams went to OSA's 2019 national event in Milwaukee, WI and participated in protests downtown and outside of clinics.

Williams unsuccessfully ran as a Republican for House District 97 in Maine in 2018. She withdrew her candidacy after [redacted]

Statements/Press/Miscellaneous

Downtown Milwaukee, Street Preaching with Bevelyn Beatty, [redacted], and many others

Two (Awesome) Black Gals Get [redacted] Charged with a Crime

Eye on Augusta: Candidate for Belfast House Seat Facing Assault Charge

"I want people to know I am not your typical innocent candidate. I have been arrested before, I have been homeless before, I was shot in the leg at 14 in North Carolina and also stabbed in my back literally at 16 years old by a group of girls that bullied me growing up in North Carolina. I come from a hard knock life and hard background. My mother was a single woman on drugs and diagnosed bipolar and my father was absent at times due to his life of crime and discord with my mother, and this subjected her to taking care of 5 children alone." – Beatty, quoted in Free Press article

EXHIBIT 084

From: "Taskforce, Clinicviolence (CRT)" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=522F028AB01B4A8F80FA998F7D6D0570-_MB_CLINICV>
To: "[redacted]@humedco.com>
Cc: "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: Anti-Abortion Extremists On a Spree
Date: Wed, 20 Jul 2022 16:00:20 -0400
Importance: Normal

Hi, [redacted] –
Apologies for the delay responding.
Let's have a call to discuss.
I am available tomorrow morning at 10 am, and pretty flexible on Friday.
Thanks,
Sanjay

From: [redacted]@humedco.com>
Sent: Thursday, July 14, 2022 1:58 PM
To: Taskforce, Clinicviolence (CRT) <[redacted]>; Michelle Davidson <[redacted]@prochoice.org>; [redacted]@prochoice.org;'[redacted]@prochoice.org; Scozzafava, Chiko <[redacted]@ppfa.org>; Noah, Krista [redacted]@ppfa.org>; Pena, Richard <[redacted]@ppfa.org>; duVergne Gaines <[redacted]@feminist.org>; [redacted]@northlandfamilyplanning.com; [redacted]@northlandfamilyplanning.com; [redacted]@yahoo.com; [redacted]@awomanschoiceinc.com; [redacted]@awomanschoiceinc.com; [redacted]@carafem.org; [redacted]@outlook.com;'[redacted]@redriverwomensclinic.com; [redacted]@gmail.com; [redacted]@apwhc.com; [redacted]@wholewomanshealth.com; [redacted]@gmail.com; [redacted]@affmedical.com; [redacted]@yahoo.com;'[redacted]@yahoo.com; [redacted]@yahoo.com; [redacted]@yahoo.com; [redacted]@gmail.com; [redacted]@feministcenter.org; [redacted]@abortioncarenetwork.org; [redacted]@thewomenscenters.com>
Cc: Fitzgerald, Paige (CRT) <[redacted]>; Cowall, Laura (CRT) <[redacted]>; Smith, Katelyn (CRT) <[redacted]>; Pickens, Kai T <[redacted]>; McCracken, Brice P. <[redacted]>; [redacted] (CID) (FBI) <[redacted]>; [redacted] (CTD) (FBI) <[redacted]>; [redacted] (CTD) (FBI) <[redacted]>; Brandt, Robert (USMS) <[redacted]>; Goddard, Lauren (NSD) <[redacted]>; [redacted] (CTD) (FBI) <[redacted]>
Subject: [EXTERNAL] Anti-Abortion Extremists On a Spree

Hello,
I am writing this email to the broad group as I am deeply concerned about serial and nation-wide actions being conducted by anti-abortion extremists.
I cannot speak for all abortion providers on this list, but I do believe my concern will be echoed by many and I invite them to share.
Last Thursday on 7/7/22, 3 separate abortion-providing offices in Atlanta were aggressively invaded by 3 individuals: Bevelyn Beatty Williams, her husband Rickey Williams and Edmee Chavannes.

Today they were buzzed into our security vestibule at [redacted] ([redacted]). Upon entry they were recognized and our office (which was caring for patients) had to go on lock-down.

The invaders spent over 10 minutes yelling, threatening and telling patients approaching our front door that they would need to get thru them in order to get inside our center. they threatened to only leave under arrest.

The Atlanta Police did not respond in time to take direct action and did not take a report. We called our district police and they came to our center but refused to make a report because we "invited" the invaders in by buzzing the door and the invaders left on their on will. Allow me to note- we buzzed them into our security vestibule which was uniquely designed to protect our staff and patients from aggressive invaders.

After leaving our center, Bevelyn, Rickey and Edmee went on to invade another abortion providing office in Atlanta with no police intervention. Since they were broadcasting their actions live on Facebook, we notified the Atlanta Police that the invaders were going to other offices. We falsely assumed they would cut them off- they did not.

I contacted an excellent and pro-active Georgia based Special Agent of the FBI and received an appropriate response- a visit in person. I am dismayed it took our FBI to make this case a recorded experience for our traumatized staff and patients.

In the wake of the "Roe leak" and the final opinion release on 6/24/22, abortion providers have experienced blockades (Michigan, New York), invasions (Georgia, Washington DC,) as well as daily protests. Of course some of us have also been subjected to the presence of the Proud Boys at rallies in Philadelphia and Boston.

At previous protests of our center we endured hours of verbal abuse by Bevelyn and Edmee- they are infamous for hate speech and criminal activities. On the evening of January 5th, they publicly socialized with the Proud Boys in Washington DC and publicly bragged about their ability to bring the Proud Boys to our clinic for their security.

We are scared. Can you help to stop these three habitually criminal extremists from coming on our properties? Can you tell me they are on your watch list as domestic terrorists? I need to continue to provide abortion services in any state where we have offices for as long as we can and I will not submit to Bevelyn, Rickey or Edmee- but they seem very dedicated to doing whatever they like to disrupt our duty to care for patients who are already under intense pressure to find a safe and legal abortion.

I intend on pursuing charges against these bad actors and I have compiled evidence of their FACE violations and brazen trespasses.

Thank you in advance for your serious consideration of this message and for being available to me via the Task force.

Sincerely,

[redacted]

[redacted]

Vice President for Abortion Access

Pronouns: she/her/hers

Email: [redacted]

[redacted]

CONFIDENTIALITY: This email and any attachments may be confidential and/or privileged and are therefore protected against copying, use, disclosure or distribution. If you are not the intended recipient, please notify us immediately by replying to the sender and double deleting this copy and the reply from your system. Thanks.

EXHIBIT 085

From: S" [redacted] " <[redacted]>
To: [redacted] <[redacted]>
Subject: Re: [EXTERNAL] WOHOOOOOO
Date: Wed, 30 Aug 2023 09:06:28 -0400
Importance: Normal

Thanks [redacted]!

Sent from my iPhone

On Aug 29, 2023, at 15:38, [redacted] <[redacted]> wrote:

Thank you!

[redacted]
Vice President for Abortion Access
Pronouns: she/her

[redacted]
[redacted]
Call/Text: [redacted]

EXHIBIT 086

From: "Morris, Catherine (PA●)" <[redacted]>
To: "Gibson, Rose (CRT)" <[redacted]>
Cc: "Felte, James (CRT)" <[redacted]>, "Weiner, Robert (CRT)" <[redacted]>, "Moossy, Robert (CRT)" <[redacted]>, "Bradford, Aryele (PAO)" <[redacted]>, "Hartnett, Julia (PAO)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: DC FACE Trial
Date: Tue, 29 Aug 2023 15:31:20 -0400
Importance: Normal
Attachments: 8.29.23_DC_FACE_Case_3.30_PM.docx

Sounds good. Here's the latest draft, and we'll get this out shortly.

Catherine Morris
Special Assistant to the Director, Office of Public Affairs
U.S. Department of Justice
(m) [redacted]

From: Gibson, Rose (CRT) <[redacted]>
Sent: Tuesday, August 29, 2023 3:31 PM
To: Morris, Catherine (PAO) <[redacted]>
Cc: Felte, James (CRT) <[redacted]>; Weiner, Robert (CRT) <[redacted]>; Moossy, Robert (CRT) <[redacted]>; Bradford, Aryele (PAO) <[redacted]>; Hartnett, Julia (PAO) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Subject: Re: DC FACE Trial

I don't have a sentencing date. I'd just leave that blank for now.

Rose Gibson
[redacted]

On Aug 29, 2023, at 3:28 PM, Morris, Catherine (PAO) <[redacted]> wrote:

Thanks, Jim! I was just drafting an email about this one! Has a sentencing date been set?

Catherine Morris
Special Assistant to the Director, Office of Public Affairs
U.S. Department of Justice
(m) [redacted]

From: Felte, James (CRT) <[redacted]>
Sent: Tuesday, August 29, 2023 3:28 PM
To: Weiner, Robert (CRT) <[redacted]>; Moossy, Robert (CRT) <[redacted]>
Cc: Bradford, Aryele (PAO) <[redacted]>; Morris, Catherine (PAO) <[redacted]>; Hartnett, Julia (PAO) <[redacted]>; Gibson, Rose (CRT) <[redacted]>; Patel, Sanjay (CRT)

<[redacted]>
Subject: DC FACE Trial

Team,

The jury found all defendants guilty on all counts. Additionally, the jury made the finding that ALL 5 defendants used force and physical obstruction and ALL 5 defendants were taken into custody.

Well done, Sanjay!

Jim

EXHIBIT 087

From: Michelle Davidson <[redacted]@prochoice.org>
To: "Patel, Sanjay (CRT)" <[redacted]>
Subject: [EXTERNAL] RE: Super Quick Question
Date: Mon, 15 May 2023 10:57:43 -0400
Importance: Normal

Thank you!!

Thanks,

Michelle

From: Patel, Sanjay (CRT)"<[redacted]>
Sent: Monday, May 15, 2023 10:56 AM
To: Michelle Davidson <[redacted]@prochoice.org>
Subject: RE: Super Quick Question

Sure...this should be a complete list of all active/pending FACE cases:

1. US v. Handy et al (DC) 22-cr-96
2. US v. Gallagher et al (MDTN) 22-cr-327
3. US v. Zastrow et al (EDMI) 23-cr-20100
4. US v. Freestone et al (MDFL) 23-cr-25 *(CPC)
5. US v. Chamberlain (CDCA) 22-cr-36
6. US v. Vandebona (CDCA) 23-cr-148
7. US v. Barron (NDIL) 22-cr-500
8. US v. Green (DWY) (I don't have the case number)
9. US v. Dear (DCO) 19-cr-506
10. US v. Moscinski (EDNY) 22-cr-485
11. US v. Williams et al (SDNY) 22-cr-684

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Monday, May 15, 2023 10:34 AM
To: Patel, Sanjay (CRT)"<[redacted]>
Subject: [EXTERNAL] Super Quick Question

Hey Sanjay – do you have a list of active FACE charges (all – including CPC's and churches)?
Time sensitive!

Thanks,

Michelle

EXHIBIT 088

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Michelle Davidson" <[redacted]@prochoice.org>
Cc: "security" <[redacted]@prochoice.org>
Subject: RE: Terms of Release
Date: Mon, 31 Oct 2022 14:51:06 -0400
Importance: Normal
Attachments: E_Zastrow_conditions.pdf; Edl_conditions.pdf; Greeni_-_modified_conditions.pdf; J_Zastrow_conditions.pdf; Place_conditions.pdf; C_Zastrow_-_modified_conditions.pdf
Inline-Images: image005.png; image006.png; image007.png; image008.png

---

Hey, Michelle –
Here's what I have.
I'm hoping to connect with Amanda tomorrow.
I'll see if she has the rest of them.
Hope you're well,
SP

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Monday, October 31, 2022 2:21 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: [redacted] <security@prochoice.org>
Subject: [EXTERNAL] Terms of Release

Hey Sanjay!

Just following up to see if you could pass on the Terms of Release for the other OSA extremists (Gallagher, Cal, James, and Eva Zastrow, Edl, and Place) as well as the DC (PAAU) crew Terms of Release.

10/27/22 - Michigan

[redacted] **Cal Zastrow** is with [redacted] ...
1h

Moms are arriving now to commit murder.
We are are here to offer hope and help,
We are here to proclaim Jesus!



[redacted] Cal Zastrow
1d ·

It's a kill day here at the Saginaw surgical abortuary. As I offer help, preach the Gospel of Jesus Christ, and intercede , would you please pray for saved souls and lives?

10/30/2022- "Reformcon 2022" Mesa, AZ

[redacted]
1d ·

Reformcon 2022 was such an encouragement. Such a refreshing time to gather with saints in the battle from all over the country and rest in the Word, worship, and prayer.

I took almost no pictures, but these pictures taken by my friends really captured a moment that will be very precious to me for a long time.

Thanks be to God for the encouragement and communion of the body of Christ. Thanks be to God for brothers and sisters willing and faithful to labor to further the Kingdom of Heaven.

Worthy is the Lamb!





10/31/2022

Progressive Anti-Abortion Upri...



Last night, days before the Michigan election, PAAU activists dropped a large banner that read "NO PROP 3" during the infamous football game between the University of Michigan and Michigan State University at Michigan Stadium. This action was in response to the extreme and dangerous nature of the constitutional amendment that Michigan will be voting on next Tuesday.

If passed, this amendment would alter the Michigan state constitution to expand abortion to all 9 months of pregnancy, allow non-doctors to perform abortions, remove parental consent laws, and remove 25 health and safety standards from abortion businesses, forever.

-Michelle

EXHIBIT 089

From: "Klopf, Amanda (USATNM)" <[redacted]>
To: duVergne Gaines <[redacted]@feminist.org>
Cc: Michelle Davidson <[redacted]@prochoice.org>, "Ramnaney, Nikhil (CRT)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: Indictment copy
Date: Tue, 11 Oct 2022 17:43:22 -0400
Importance: Normal
Attachments: Vaughn_conditions.pdf; Davis_conditions.pdf; Boyd_conditions.pdf; Idoni_conditions.pdf; Green_conditions.pdf
Inline-Images: image001.png

Please see the attached. When Zastrow and Gallagher's are entered, I'll circulate them

From: duVergne Gaines <[redacted]@feminist.org>
Sent: Monday, October 10, 2022 7:52 PM
To: Klopf, Amanda (USATNM) <[redacted]>
Cc: Michelle Davidson <[redacted]@prochoice.org>
Subject: [EXTERNAL] Re: Indictment copy

Dear Amanda -

We would greatly appreciate it if you are able to share publicly filed Terms of Pre-trial Release for all indicted defendants re. Case No. 3:22-00327.

Many thanks.

duVergne

duVergne Gaines, JD
Director, National Clinic Access Project
Feminist Majority Foundation
O: [redacted]
C: [redacted]
E: [redacted]@feminist.org

The information contained in this electronic message and any attached documents are privileged, confidential and protected from disclosure, and the information may not necessarily express the opinion of Feminist Majority Foundation. If you are not the intended recipient, note that any review, disclosure, copying, or dissemination of this message or any attachments is strictly prohibited. If you think that you have received this message in error, please destroy it and notify the sender.

From: Klopf, Amanda (USATNM) <[redacted]>
Sent: Wednesday, October 5, 2022 4:58 PM
To: duVergne Gaines; Michelle Davidson
Cc: Patel, Sanjay (CRT); Ramnaney, Nikhil (CRT)
Subject: Indictment copy

duVergne and Michelle,

FYI, attached is a copy of the indictment that was unsealed today in US v. Gallagher. If you have any questions, please let us know.

Amanda

Amanda J. Klopf

Assistant United States Attorney

Civil Rights Coordinator

Computer Hacking and Intellectual Property Attorney

Middle District of Tennessee

U.S. Attorney's Office | [redacted] | [redacted]
T: [redacted]

eMail: [redacted]

EXHIBIT 090

From: "NAF Security Department" <[redacted]>
To: [redacted]@usdoj.gov
Subject: [EXTERNAL] Security Alert: Terms of Release for Antis in TN, MI, GA, VA, DC, MS
Date: Thu, 13 Oct 2022 09:02:01 -0400
Importance: Normal

Membership

Security Update

NAF Member Security Alert:
Anti-Abortion Extremists Indicted by Tennessee Grand Jury Update: Terms of Release

October 13, 2022

Last week, we shared information about recent investigations and charges against 11 anti-abortion extremists for violating the Freedom of Access to Clinic Entrances (FACE) Act. Those individuals were detained and most of them were released this week subject to the conditions below.

If convicted, the 11 individuals (Chester "Chet" Gallagher, Heather Idoni, Calvin Zastrow, Coleman Boyd, Caroline Davis, Paul Vaughn, Dennis Green, Eva Edl, Eva Zastrow, James Zastrow, and Paul Place) could each face up to 10 years in prison and significant fines for violating the FACE Act. Many federal conspiracy charges carry a five- to 20-year minimum sentencen

These defendants must not violate federal, state, or local laws while on release. Violating any of the conditions of release may result in the immediate issuance of a warrant for arrest, revocation of release, an order of detention, forfeiture of any bond, and a prosecution for contempt of court and could result in imprisonment, a fine, or both.

Chester "Chet" Gallagher remains in custody at this time. The following individuals were released from detention with the following terms:

Paul Vaughn

- Prohibited from traveling outside the **Middle District of Tennessee** unless approved in



advance by pretrial services, except for work and notification in advance is required.

- Vaughn must avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution.
- Prohibited from entering any building or the curtilage of any building in which a reproductive health services facility is located or be within 20 feet of such a building without prior approval of pretrial services.

Heather Idoni



- Prohibited from traveling outside the **Middle District of Tennessee**, **Eastern District of Michigan**, and the **District of Columbia** solely for the purposes of court hearings unless approved in advance by pretrial services.
- Must avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution as well as codefendants.
- Prohibited from entering any building that contains a facility that provides reproductive health services, the curtilage of such a building, or being within 20 feet of such a building unless she is seeking her own personal medical needs and without prior approval of the pretrial services department.
- Not possess a firearm, destructive device, or other dangerous weapons and remove all described items from residence.

Caroline Davis



- Prohibited from traveling outside the **Middle District of Tennessee** and **Michigan** solely for court hearings and for attorney-client meetings regarding pending criminal cases. Defendant is also restricted to the **Northern District of Georgia** unless the supervising officer has approved travel in advance. Defendant must provide advance notice to her pretrial services officer before traveling to **Michigan** or **Tennessee**.
- Must avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution as well as codefendants.

- Defendant is directed to stay at least 100 feet from any clinic providing family planning services, unless she has permission from her pretrial services officer.
- Not purchase, possess, or acquire a firearm, destructive device, or other dangerous weapon.

Dennis Green

DennisG

- Remain in the **Western District of Virginia** and not travel outside of the **Western District of Virginia** except for meeting with his attorney or court appearances approved in the **Middle District of Tennessee** and as approved by pretrial services.
- Green is prohibited from entering any building that contains a facility that provides reproductive health services, the curtilage of such a building, or being within 50 feet of such a building.

Coleman Boyd

ColemanB

- Boyd must remain in the state of **Mississippi** at all times during the pendency of these proceedings unless special permission is obtained from the Court and to travel to **Nashville, TN** to attend Court proceedings.
- Boyd is prohibited from entering any building that contains a facility that provides reproductive health services, the curtilage of such a building, or being within 20 feet of such a building.

We will provide details on the Conditions of Release for Chester "Chet" Gallagher, Calvin "Cal" Zastrow, Eva Zastrow, James Zastrow, Eva Edl, and Paul Place as soon as they are available.

If you see any of these individuals outside your facility or witness any violations of the terms of release listed above, contact law enforcement and any member of the NAF Security Team immediately.

Please report any suspicious activity to law enforcement and NAF Security immediately.

Please contact [redacted]@prochoice.org members of the Security Team directly with questions about this alert, submitting incident reports, or any other security concerns:

Michelle Davidson, Security Director:
[redacted]@prochoice.org; [redacted]

Robert Ledogar, Southeast Security Manager:
[redacted]@prochoice.org; [redacted]

Eduardo Serrano, Intelligence Analyst:
[redacted]@prochoice.org; [redacted]

Michelle and Robert are available by phone, 24 hours a day, to assist you with any security incidents, threats, or emergencies.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

 Facebook  Twitter  YouTube  Website  Instagram

Copyright © 2022 National Abortion Federation. All rights reserved.
[redacted]

You are receiving these emails because you are either a NAF member or subscribed via our website.
You can update your email preferences at any time by contacting [redacted]@prochoice.org.

EXHIBIT 091

From: "Sanjay [redacted]" <[redacted]>
To: Laura-Kate Bernstein <[redacted]>, Kyle Boynton <[redacted]>, Wilfred Beaye <[redacted]>
Subject: Fwd: [EXTERNAL] Eva Zastrow - Potential Sentencing Violation
Date: Thu, 29 Aug 2024 17:19:49 -0400
Importance: Normal
Attachments: 16915865986.pdf; image.png
Inline-Images: Outlook-eexx3f5c.png

Sent from my iPhone

Begin forwarded message:

From: Michelle Davidson <[redacted]@prochoice.org>
Date: August 29, 2024 at 15:13:50 EDT
To: "[redacted] (ME) (FBI)"t<[redacted]>, "Klopf, Amanda (USATNM)" <[redacted]>
Cc: security <[redacted]@prochoice.org>, "Patel, Sanjay (CRT)" <[redacted]>
Subject: [EXTERNAL] Eva Zastrow - Potential Sentencing Violation

Hi Amanda and Mark,

We received intel that Eva and Cal Zastrow were protesting outside a NAF member facility in Flint, MI today. Would this be a violation of her house arrest? Let me know if there is anyone else I should send this info to.

Would you be able to provide details on when Cal will report for his 6 month sentence?

Thanks for any assistance you can provide. Please don't hesitate to reach out if you need anything at all. I hope you both are doing well!

-Michelle

Image Link

Michelle Davidson
Director, Security
Pronouns: Any (no preference) or just Michelle

NAF Security
[redacted]
Book a meeting
Direct line: [redacted]
This line is not reliable for text messages

"Don't ever let them steal your joy" - Brandi Carlile

I respect that your working hours may be different from mine and I support your healthy work/life boundaries. Only respond when you have the time and capacity.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.



NATIONAL
ABORTION
FEDERATION

EXHIBIT 092

From: "Patel, Sanjay (CRT)"[redacted]
To: "Christopher Keefe" [redacted], "[redacted] (WF) (FBI)" [redacted], "Aloi, Elizabeth (USADC)" [redacted]
Subject: RE: Possible Violation of Release Terms, Lauren Handy
Date: Fri, 12 May 2023 16:58:35 -0400
Importance: Normal
Inline-Images: image001.jpg

Thanks [redacted] and [redacted].
Adding [redacted] to this thread.
We should discuss the Handy event.
Is everyone available Monday for a team call?
SP

From: Christopher Keefe [redacted]
Sent: Friday, May 12, 2023 3:24 PM
To: [redacted] (WF) (FBI) [redacted]; Aloi, Elizabeth (USADC) [redacted]; Patel, Sanjay (CRT) [redacted]
Subject: Re: Possible Violation of Release Terms, Lauren Handy

Also following up on trial subpoenas, [redacted] was located and served today. She was nervous about her role at trial but willing to cooperate which bodes well. She was asking about Molly Gaston but I'm sure we can make her feel as comfortable as possible through the trials.

More to follow for travel and prep but at least we know where she is and have a good contact for her as we move forward.

Talk soon,
C

From: [redacted] (WF) (FBI) [redacted]
Sent: Friday, May 12, 2023 3:18:53 PM
To: Aloi, Elizabeth (USADC) [redacted]; Patel, Sanjay (CRT)i [redacted]; [redacted] (WF) (FBI) [redacted]
Subject: Re: Possible Violation of Release Terms, Lauren Handy

Hi Liz & Sanjay,
Apologies for the brevity of my previous email, as I forwarded it from a marathon sentencing hearing.

Just wanted to get your thoughts on this and whether or not it would constitute a violation of Handy's probation.

Thanks!

[redacted]

SA [redacted]
FBI | WFO | CR-10 (DC Public Corruption & Civil Rights)
C: [redacted]
O: [redacted]

From: [redacted] (WF) (FBI) [redacted]
Sent: Thursday, May 11, 2023 2:53:26 PM
To: Aloi, Elizabeth (USADC) [redacted]; Patel, Sanjay (CRT)i [redacted]; [redacted] (WF) (FBI) [redacted]
Subject: Fwd: Possible Violation of Release Terms, Lauren Handy

FYSA

SA [redacted]
FBI | WFO | CR-10 (DC Public Corruption & Civil Rights)
C: [redacted]
O: [redacted]

From: [redacted] (CID) (FBI)i [redacted]
Sent: Thursday, May 11, 2023 2:50:08 PM
To: [redacted] (WF) (FBI) [redacted]

Cc: [redacted] (WF)(FBI)<[redacted]>
Subject: Fwd: Possible Violation of Release Terms, Lauren Handy

Forwarding for awareness in case this may be a violation of Handy's release conditions as alleged below.

Hope you all are settled into the new space in SW!

[redacted]
Supervisory Special Agent
FBIHQ- Civil Rights Unit
via mobile device

From: Eduardo Serrano <[redacted]@prochoice.org>
Sent: Thursday, May 11, 2023, 1:57 PM
To: Patel, Sanjay (CRT) <[redacted]>; [redacted] (NO) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>; Smith, Katelyn (CRT) <[redacted]>; Fitzgerald, Paige (CRT)i <[redacted]>; Cowall, Laura (CRT) <[redacted]>
Cc: security <[redacted]@prochoice.org>
Subject: [EXTERNAL EMAIL] - Possible Violation of Release Terms, Lauren Handy

Hello all,

Attached is a post made by Lauren Handy, Director of activism for the Progressive Anti- Abortion Uprising (PAAU), announcing that she will be leading a training on anti-abortion activity. The event is virtual and is scheduled to take place May 18 from 7-9pm ET. Here is some language created by PAAU about the event.

"Are you nervous to go sidewalk counseling in your city? Do you feel like you aren't making a difference, or you don't know what to say? PAAU is paving the way with a new approach to sidewalk counseling that is changing the narrative on what it means to defend your community from the violence of the abortion industry. YOU need to defend the people around you from this violence, and we are ready to give you the tools to do so.

Come and learn how you can defend your community through sidewalk counseling. You'll learn practical tactics, important theory, and hear stories from PAAU staff from the sidewalk. You will also have the chance to ask questions and get live answers from activists at PAAU who have saved hundreds of babies outside abortion businesses. This is the first edition of our new series "Progressive Prolife 101".

Join us at 7pm EST on Thursday, May 18th on YouTube Live!! Link in bio."

We wanted to make sure you are all aware of this if it is indeed a violation of her terms of release. From what we have seen historically these seminars/trainings will typically include talks about future direct actions. I will continue to monitor the event and provide any relevant updates.

Thank you all for your work and continued efforts.

Respectfully,
Eduardo Serrano
Intelligence Analyst

pronouns
(He/Him)



NATIONAL ABORTION FEDERATION

NAF Security
[redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 093

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Moossy, Robert (CRT)" <[redacted]>
Cc: "Felte, James (CRT)" <[redacted]>, "Weiner, Robert (CRT)" <[redacted]>
Subject: RE: National Abortion Federation Conference
Date: Fri, 12 May 2023 18:10:17 -0400
Importance: Normal

Correct – it was not copied or distributed.

From: Moossy, Robert (CRT) <[redacted]>
Sent: Friday, May 12, 2023 5:37 PM
To: Patel, Sanjay (CRT)" <[redacted]>
Cc: Felte, James (CRT)" <[redacted]>; Weiner, Robert (CRT) <[redacted]>
Subject: RE: National Abortion Federation Conference

Thanks, and this was just shown, not copied and distributed, right?

From: Patel, Sanjay (CRT)" <[redacted]>
Sent: Friday, May 12, 2023 5:16 PM
To: Moossy, Robert (CRT) <[redacted]>
Cc: Felte, James (CRT)" <[redacted]>; Weiner, Robert (CRT) <[redacted]>
Subject: RE: National Abortion Federation Conference

Sorry – forgot to attach it.

From: Moossy, Robert (CRT) <[redacted]>
Sent: Friday, May 12, 2023 5:14 PM
To: Patel, Sanjay (CRT)" <[redacted]>
Cc: Felte, James (CRT)" <[redacted]>; Weiner, Robert (CRT) <[redacted]>
Subject: RE: National Abortion Federation Conference

Thank, do you have a powerpoint or other visuals you used for your remarks to the group?

From: Patel, Sanjay (CRT)" <[redacted]>
Sent: Friday, May 12, 2023 5:12 PM
To: Moossy, Robert (CRT) <[redacted]>
Cc: Felte, James (CRT)" <[redacted]>; Weiner, Robert (CRT) <[redacted]>
Subject: RE: National Abortion Federation Conference

Robert -
Below is some related information (including a link to NAF stats) concerning the uptick of targeted attacks against clinics, and a short blurb related to last week's NAF conference.
Happy to jump on a call if you have any questions.
SP

Abortion clinics saw an increase in violence and threats in 2022, report says

By Jamie Gumbrecht, CNN
Published 9:12 AM EDT, Thu May 11, 2023
CNN looks at the latest polling on how Americans see abortion rights

0:57 - Source: CNN

CNNn—
A new report says there was a "sharp increase" in violence at abortion clinics in 2022, the year when Roe v. Wade was overturned, ending the federal right to an abortion. A disproportionate increase occurred in states that protect abortion rights, according to the National Abortion Federation, a professional association for abortion providers.

In its annual report on violence, the federation says there were more major incidents at abortion clinics, including arson, burglaries, death threats and invasions last year than in 2021. There were decreases in trespassing and assault and battery, which the federation attributes to clinic closures.

There were 32,000 fewer legal abortions in the US in the six months after the Dobbs decision, new analysis suggests

There were four cases of arson in 2022 – in Bakersfield, California, in March; Casper, Wyoming, in May; Kalamazoo, Michigan, in July; and Las Vegas in December – an increase from two in 2021.

The report says there were 218 reports of deaths threats or threats of harm, an increase from 182 in 2021 and 57 in 2018.

In 2022, reports of stalking providers and patients grew to 92 from 28 in 2021, and reported burglaries grew to 43 from 13.

For the first time since 2011, facilities reported receiving suspicious letters containing a white powdery substance.

The federation says it has tracked violence and disruption at reproductive health facilities since 1977. It collects monthly reports from facilities – 80% reported data for the new report – and follows up to collect complete reports. Some closed clinics weren't able to report data in 2022 and others reported for only part of the year.

The 2022 report includes data from the US, Canada and Colombia, while 2021 data also includes Mexico City.

The federation says it does not include incidents that can't be validated, "which suggests that actual incidents are higher than reported."

https://www.cnn.com/2023/05/11/health/abortion-clinic-violence-report/index.html

Link to annual report:

https://prochoice.org[redacted]

NAF CONFERENCE:
NAF held its annual conference in Denver May 1-5.
I was invited to speak about our FACE enforcement efforts.

The conference had 1000+ registered attendees.
Our FACE segment was well attended...we had over 150 providers in the audience.
NAF budgeted 1.5 hours for the presentation, but we could have easily filled 2+ hours with the audience participation/questions.
The presentation was well received. I was thanked for our FACE work by a long line of folks after the presentation.
The big takeaway - many providers are scared with the Dobbs anniversary fast approaching; and they are frustrated that we are using FACE to protect "fake clinics."
There were many other providers who fired back during some cross-audience debating, recognizing that if we don't enforce the statute even-handedly, we will likely lose it.
Overall, our participation and my experience was positive.

From: Moossy, Robert (CRT) <[redacted]>
Sent: Friday, May 12, 2023 4:43 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Felte, James (CRT) <[redacted]>; Weiner, Robert (CRT) <[redacted]>
Subject: FW: National Abortion Federation Conference

Sanjay,

Have anything? They are preparing remarks for Vanita, so were wondering what you had for the NAF conference. No need to create anything.

From: Sooknanan, Sparkle (OASG) <[redacted]>
Sent: Friday, May 12, 2023 11:18 AM
To: Moossy, Robert (CRT) <[redacted]>
Subject: National Abortion Federation Conference

Are there any materials that Sanjay used for his presentation that you can share?

Also fyi:
Report: "Sharp increase" in crimes against abortion clinics post-Roe (axios.com)

EXHIBIT 094

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Michelle Davidson" <[redacted]@prochoice.org>
Subject: RE: [redacted] Status Hearing Rescheduled"- Investigative Case [redacted] - Court Case 23-CR-20100
Date: Wed, 19 Apr 2023 11:51:15 -0400
Importance: Normal

Hey,
I'm pretty sure the continuance was to accommodate the attorneys' schedules, and to provide sufficient time before trial to litigate pretrial issues the defendants may raise.
The part regarding pleas might be standardized language in all letters.
I'll check with the prosecutors about that.

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Wednesday, April 19, 2023 11:38 AM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: [EXTERNAL] [redacted] Status Hearing Rescheduled - Investigative Case [redacted] - Court Case 23-CR-20100

Hey Sanjay,

duVergne has probably asked you about this but just in case she hasn't and the chance that you may have some insight that you can share as to why, just thought I'd ask. [redacted], as you know, does not like ominous situations and reached out for my help/insight which I don't have much currently. It seems like they may plead? If I know [redacted], she will not want to accept one but also listens for advice. Below is the letter she received yesterday.

-MD

From: **U.S. Department of Justice- VNS** <[redacted]>
Date: Tue, Apr 18, 2023 at 12:14 PM
Subject: U.S. Department of Justice - VNS - Investigative Case [redacted] - Court Case 23-CR-20100
To: [redacted] <[redacted]>

DO NOT REPLY TO THIS EMAIL.



U.S. Department of Justice
Eastern District of Michigan
[redacted]
Phone: [redacted]
Fax: [redacted]

April 18, 2023

[redacted]

Re: United States v. Defendant(s) Chester Gallagher, [redacted], Eva Edl, Justin Phillips, Joel Curry, Eva Zastrow, Calvin Zastrow
Case Number [redacted] and Court Docket Number 23-CR-20100

Dear [redacted]:

The enclosed information is provided by the United States Department of Justice Victim Notification System (VNS). As a victim witness professional, my role is to assist you with information and services during the prosecution of this case. I am contacting you because you were identified by law enforcement as a victim or potential victim during the investigation of the above criminal case.

The status hearing previously scheduled for defendant(s) Eva Edl, [redacted], Chester Gallagher, Calvin Zastrow, Eva Zastrow, Joel Curry, Justin Phillips on May 16, 2023, 02:00 PM at Courtroom 207, 231 West Lafayette Blvd., Detroit, MI 48226 has been rescheduled by the court. VNS will continue to provide you with updated case scheduling and event information.

A status hearing is scheduled before Judge Matthew Leitman for July 17, 2023, 02:00 PM at Courtroom 207, 231 West Lafayette Blvd., Detroit, MI 48226 for defendant(s) Eva Edl, [redacted], Chester Gallagher, Calvin Zastrow, Eva Zastrow, Joel Curry, Justin Phillips. The purpose of this hearing is to determine if there are issues that the Court needs to address and to schedule any necessary future court dates.

The trial previously scheduled for defendant(s) Eva Edl, [redacted], Chester Gallagher, Calvin Zastrow, Eva Zastrow, Joel Curry, Justin Phillips on May 30, 2023, 09:00 AM at Courtroom 207, 231 West Lafayette Blvd., Detroit, MI 48226 has been rescheduled by the court. VNS will continue to provide you with updated case scheduling and event information.

A trial is scheduled before Judge Matthew Leitman on August 1, 2023, 09:00 AM at Courtroom 207, 231 West Lafayette Blvd., Detroit, MI 48226 for the case which involves defendant(s) Eva Edl, [redacted], Chester Gallagher, Calvin Zastrow, Eva Zastrow, Joel Curry, Justin Phillips.

Please be aware that many criminal cases are resolved by a plea agreement between the United States Attorney's Office and the defendant. You should also know that it is not unusual for a defendant to seek to negotiate a plea agreement shortly before a trial is scheduled to begin. Plea agreements can be made at any time and as late as the morning of trial, leaving little or no opportunity to provide notice to you of the date and time of the plea hearing. If the court schedules a plea hearing in this case, we will use our best efforts to notify you of available information as soon as practicable. If you want to inform the prosecutor of your views regarding potential plea agreements, or any other aspect of the case, please contact the prosecutor assigned to this case or me.

Unless you have received a subpoena to attend as a witness in this matter, your attendance is not required. Because of the Court's schedule, hearing dates could change on very short notice. If you plan on attending, you may want to call the VNS Call Center or check the web site to confirm the date and time.

Because of the Court's schedule, hearing dates could change on very short notice. If you plan on attending, you may want to call the VNS Call Center or check the website to confirm the date and time. Please note, there is a 24-hour delay in information transfer to the website.

Through the Victim Notification System (VNS) we will continue to provide you with updated scheduling and event information as the case proceeds through the criminal justice system. You may obtain current information about this case on the VNS website at https://www.notify.usdoj.gov or from the VNS Call Center at [redacted] ([redacted]) (TDD/TTY: [redacted]) (International: [redacted]). In addition, you may use the Call Center or Internet to update your contact information and/or change your decision about participation in the notification program.

You will use your Victim Identification Number (VIN) [redacted] and Personal Identification Number (PIN) [redacted] anytime you contact the Call Center and the first time you log into VNS on the website. If you are receiving notifications with multiple victim ID/PIN codes please contact the VNS Call Center. In addition, the first time you access the VNS website, you will be prompted to enter your last name (or business name) as currently contained in VNS. The name you should enter is [redacted].

Remember, VNS is an automated system and cannot answer questions. If you have other questions which involve this matter, please contact this office at the number listed above.

Sincerely,

Sherri Holloway
Victim Witness Specialist

If you do not want to receive email notifications from the Victim Notification System (VNS) please log into the VNS Web site at https://www.notify.usdoj.gov, select "My Information", remove your email address and click the "update" button. If you remove your email address, you will continue to receive letters from VNS except in those case which have large numbers of victims. To change your email address, select "My Information", provide a new address and click the "update" button.

If you do not want to receive any notifications in your case, select "Stop Receiving Notifications" and follow the instructions on the screen.

If you believe you have received this email in error, please contact the office listed at top of the email message.

Please note, if this is the first notification you have received from VNS you will need to wait 4-8 hours from receipt of this email before you can login to the VNS Internet site (https://www.notify.usdoj.gov). In addition, it will also be 4-8 hours before any documents which may have been uploaded to VNS as part of this notification are available under the "Downloads/Links" section on the Web page.

Please call the Victim Notification System (VNS) Help Desk at phone number [redacted] for assistance and questions.

EXHIBIT 095

From: Michelle Davidson <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Subject: [EXTERNAL] RE: questions for TF
Date: Mon, 29 Nov 2021 17:25:49 -0500
Importance: Normal

I know [redacted] from [redacted] is going to ask about the blockade at her clinic in 2020 as well as [redacted] and his AR-15, standing on a ladder, yelling "you deserve to die" outside her clinic at staff and patients– scaring them.
She may also ask about how protesters will surround a car pulling into the driveway of the clinics forcing the driver to stop.

There may be questions on the injunction against Bevelyn Beatty in NY getting overturned.

I'll let you know if I come across any others between now and then.

Thanks for adding [redacted] to the attendee list.

[redacted], Exec Director, [redacted] (Detroit, Atlanta) [redacted]

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Monday, November 29, 2021 1:43 PM
To: Michelle Davidson <[redacted]>
Subject: questions for TF

Hey, Michelle–
Thanks for the call today.
I'm putting together a list of q's to discuss with Paige that I can expect to receive at the meeting.
Here's what I got from our call today:

1. Can DOJ bring FACE charges (crim or civ) related to RRR clinic invasions where the subjects do not actively block entrances and exits, but still force the clinic to shut down bc of the disturbance caused? (i.e. charge on a theory of "constructive phys obstruction"?)
2. If FACE language does not allow #1 (above), then can you do something to change or amend the language of the statute to deal with RRR styled conduct?
3. Can DOJ support or advocate for amendments to the proposed Peace Act to include funding to support security for reproductive health care clinics? See https://www.congress.gov/bill/117th-congress/senate-bill/2682/text?r=62&s=1

Did I frame the questions correctly?
Are there any other questions you're aware of?

EXHIBIT 096

From: Michelle Davidson <[redacted]@prochoice.org>
To: "Patel, Sanjay (CRT)" <[redacted]>
Subject: [EXTERNAL] RE: looking for a resource
Date: Tue, 09 Nov 2021 18:54:57 -0500
Importance: Normal

Okay, getting a list together for you. Is it okay if I connect you via email intro so they aren't confused? Do you have a quick description of the goal of the meeting I can use then you can follow up with your big invite? Here's my list so far:

Providers that have experienced significant incidents of targeted anti-choice harassment/FACE violations:

- [redacted] – [redacted] – Blockades, Bomb Threats,
- [redacted] – [redacted]
- [redacted] – [redacted] (Raleigh, Charlotte, Greensboro, Jacksonville)
- [redacted] – [redacted]
- [redacted] – [redacted]
- [redacted] – [redacted]
- [redacted] – [redacted] (Raleigh, Charlotte, Augusta, Forest Hills, GA)
- [redacted] – [redacted]
- [redacted] – [redacted] Saginaw, MI and Flint, MI – Blockades, Invasions

Funders/Donors:
The Lisa and Douglas Goldman Fund is the main funder of our Security work. We could invite our Program Officer.
There is a large anonymous foundation who is the largest funder in our movement and we could invite a Program Officer from there.

I'm assuming your inviting PPFA (Krista, Chiko, and Rich) as well as duVergne at FMF, right?

I'm still wracking my brain but this should be a very talkative group. I'll be there for sure. Let me know what you think of the list and I'll get it rolling!

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Tuesday, November 9, 2021 1:46 PM
To: Michelle Davidson [redacted]@prochoice.org>
Subject: RE: looking for a resource

I'd like to include the larger organizations that cover most of the clinics nationwide, and those who specifically serve the clinics that have been targeted over the past year. Particularly those who have something they want to share/ask/address with the task force (and AAG).

As for the funding organizations, yes, the larger ones that provide the majority of funding nationwide.

I'm trying to keep the group a manageable size so that everyone will have time to speak and share thoughts / concerns.

Sorry for the confusion.
SP

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Tuesday, November 9, 2021 4:34 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: [EXTERNAL] RE: looking for a resource

Hey Sanjay,

Can you help me narrow it down a little? Are we talking about key providers that have experienced incidents recently? There are a lot of orgs across the country that provide funding - almost every state has one. Are you looking for large orgs that provide funding like we do?

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Tuesday, November 9, 2021 2:27 PM
To: Michelle Davidson <[redacted]@prochoice.org>
Subject: RE: looking for a resource

Hey, Michelle –
Following up on this request.
Any chance you might have a list of folks for me this week?
Also, can you include in that list organizations that provide access funding?

Should I reach out to duVergne as well?

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Wednesday, October 27, 2021 5:02 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: [EXTERNAL] RE: looking for a resource

Hey Sanjay,

I'm not sure who all was on the call with the AAG since I had to miss it. Do you have a list you can share and then I can add to it? If not, it might take me until Monday to get something to you. Sorry for the delay!

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Friday, October 22, 2021 11:51 AM
To: Michelle Davidson <[redacted]@prochoice.org>
Subject: looking for a resource

Happy Friday, Michelle –
I'm planning the joint Task Force/stakeholders meeting.
And, I need to figure out the universe of attendees to invite.
Do you have a list of organizations that provide some service to patients/providers whom I should include?
I know that there were several organizations like Afiya that participated in the last meeting with the AAG.
If you have a resource (a list) of the big ticket organizations and suggestions as to whom I should invite to the meeting, can you share?
Thanks!
SP

EXHIBIT 097

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Fitzgerald, Paige (CRT)" <[redacted]>
Subject: draft agenda for 12-1 TF meeting with NGOs
Date: Fri, 26 Nov 2021 11:35:00 -0500
Importance: Normal
Attachments: Agenda_12-1-21_meeting_w-NGOs.docx

Hi, Paige –
Hope you had a great Turkey Day with your family.
Attached is a draft agenda for next week's meeting.
After you have reviewed it, I'd like to circulate the agenda to the TF by Monday.
FBI wants a quick call before the meeting to discuss the agenda, and how to handle questions.
And, heads-up that Mississippi v. Jackson Women's Health is set for SCt oral argument on 12-1.
Thanks,
SP

EXHIBIT 098

Task Force on Violence Against Reproductive Health Care Providers
Agenda for first meeting

**Mississippi v. Jackson's Women's Health* is set for oral argument before SCt today (Dec 1). Issue is whether MS 15-month prohibition on abortions is unconstitutional

Anticipated NGO participant list:

- National Abortion Federation
- Planned Parenthood
- Feminist Majority Foundation
- [redacted] clinic (Detroit area clinics)
- [redacted] Center (Saginaw and Flint (Michigan) clinics)
- [redacted] Center (east coast clinics, including NJ (Cherry Hill) and Philadelphia)
- [redacted] (North Carolina and Florida clinics)
- [redacted] (clinics in Atlanta, Chicago, Nashville, and DC)
- [redacted] Center (Fargo)
- [redacted] Center (Cleveland)
- [redacted] Center (Charlotte and Georgia area clinics)
- Whole Women's Health ([redacted] – plaintiff from TX SB8 civil suit pending with SCt)

Introductions:

- Sanjay to introduce the member agencies. Each agency designee provides quick self-intro as well as others from their agency in meeting
    - CRT – Sanjay
    - NSD – [redacted]
    - FBI – [redacted]
    - ATF – [redacted]
    - USMS – [redacted]
    - USPIS – [redacted]
    - Missing member agencies – Sanjay

Agenda:

- Welcome and purpose behind inclusive meeting with NGOs
- TF mission:
    - Coordinate national investigation and pros efforts into all matters involving acts of violence and other unlawful conduct directed against health care providers, patients and facilities that provide reproductive health care services, especially those implicating FACE
- Quick take on FACE:
    - Two provisions of primary concerns:
        - 248(a)(1) - incidents of force/threat/phys obstr
        - 248(a)(3) – intentional damage or destruction of facility ppty

- TF, in consultation with local U.S. Attorneys, will assess matters in an effort to make early and coordinated decisions regarding whether to proceed federally (crim or civ) on an incident
- Difference bw crim and civ
    - SPL – Laura to discuss briefly the difference bw civil and crim; and available remedies. Quick-take on *U.S. v. Rusty Thomas*, et al (WDKY)?
- Efforts to reach all incidents presents challenges
- Outreach important
    - Manner – use your contacts (NGOs have direct line to TF; FBI – we are coordinating outreach efforts)
    - Timing – investigative importance
    - Reaction – follow protocols encouraged by your security consultants to record, document, and notify
        - Take moment to praise NAF and PPFA security
- TF has been and will continue to provide law enforcement training aimed at appropriate local response
- One-offs v. organized efforts – unaffiliated actors v. planned and organized. The coordinated actors are savvy and well know how to skirt federal laws like FACE
- Although we cannot discuss on-going investigations and prosecutions, we hope that improved communication and coordination will result in more cases being prosecuted (crim and civ), which will have a deterrent effect
- Security assessment requests – USMS

Questions:

- Open floor for NGO/provider questions-talking points
    - Any ideas to improve flow of information?
    - We cannot speak for local LEO response but will conduct outreach and training to help shape the response
    - Many USAOs have dedicated prosecutors to handle clinic violence incidents. It all starts with notifying TF
- Things providers can do to:
    - Document – Δs statements with specificity
    - Capture or save digital evidence (i.e. emails, recorded telephone calls/VMs, mail/letters – minimize the number of hands)
    - Additional tips from FBI, USPIS?
- Sanjay will handle all questions related to on-going / active matters

EXHIBIT 099

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "duVergne Gaines" <[redacted]>
Cc: "[redacted]@prochoice.org" <[redacted]@prochoice.org>
Subject: RE: Question re. Mt. Juliet Local Court Case
Date: Thu, 03 Feb 2022 20:43:46 -0500
Importance: Normal

That's an excellent point.
I'll relay the thought.
Thanks, and be safe.
SP

From: duVergne Gaines<[redacted]>
Sent: Thursday, February 3, 2022 7:12 PM
To: Patel, Sanjay (CRT)<[redacted]>
Cc: [redacted]@prochoice.org
Subject: [EXTERNAL] Re: Question re. Mt. Juliet Local Court Case

Sanjayt-

Thanks so much for the effort, Sanjay. It's good to know the judge is trying to mitigate the circus for all. Let's hope the rules do indeed apply to all.

I'm attaching some updated OSA materials for you.

Bobby and I were talking today, and Bobby made the terrific point that the local DA should really ask for a stay away order to be entered against the Defendants if their case is continued and/or they plead guilty or are found guilty given a) their arrests last week for another blockade in Ft. Meyers, and b) their return this week to intimidate and target Carafem with protests.

Any chance this request might be made to the DA's office via the AUSA?

Thanks so much again.

duVergne

duVergne Gaines, JD
Director, National Clinic Access Project
Feminist Majority Foundation
O: [redacted]
C: [redacted]
E: [redacted]

The information contained in this electronic message and any attached documents are privileged, confidential and protected from disclosure, and the information may not necessarily express the opinion of Feminist Majority Foundation. If you are not the intended recipient, note that any review, disclosure, copying, or dissemination of this message or any attachments is strictly prohibited. If you think that you have received this message in error, please destroy it and notify the sender.

From: Patel, Sanjay (CRT) [redacted]
Sent: Thursday, February 3, 2022 6:53 PM
To: duVergne Gaines
Subject: RE: Question re. Mt. Juliet Local Court Case

Hi duVergne and Bobbyt–

My AUSA partner in Nashville reached out to the DA's office.

Unfortunately, the judge ordered the courtroom closed in anticipation of large crowds and potential protest.

He won't be able to accommodate the request to allow Bobby (or anyone else) to attend.

Only defendants and counsel will be admitted.

Sorry.

We'll stay in touch with the DA and share what we can with you.

SP

From: duVergne Gaines <[redacted]>
Sent: Wednesday, February 2, 2022 11:54 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: [EXTERNAL] Question re. Mt. Juliet Local Court Case

Sanjay,

The Wilson County Sheriff's office has advised us - or rather Bobby Ledogar -- that Friday's court hearing for the Mt. Juliet blockaders is closed and only defendants and lawyers will be allowed in court room.

Carafem would like to have Bobby Ledogar, NAF's South East Security Director, attend as their representative or witness to the proceedings.

We'd like to get in touch with the local prosecutor and see if they would allow Bobby to serve as a courtroom presences/witness on behalf of the victim in the case: Carafem.

Do you have the local prosecutor's name and contact info so that we may discuss this with them?

Many thanks for any and all of your help trying to reach the local DA.

Best,

duVergne

duVergne Gaines, JD
Director, National Clinic Access Project
Feminist Majority Foundation
O: [redacted]
C: [redacted]
E: [redacted]

The information contained in this electronic message and any attached documents are privileged, confidential and protected from disclosure, and the information may not necessarily express the opinion of Feminist Majority Foundation. If you are not the intended recipient, note that any review, disclosure, copying, or dissemination of this message or any attachments is strictly prohibited. If you think that you have received this message in error, please destroy it and notify the sender.

EXHIBIT 100

Operation Save America
Leaders, Key Members, & Recent Blockade Arrestees



Jason Storms
Director
[redacted]
DOB: [redacted]



Assistant Director
[redacted]



DerinStidd
Assistant Director
[redacted]



Chester "Chet" Gallagher
Police Liaison
[redacted]
DOB: [redacted]



Cal Zastrow
Blockade Leader
[redacted]
DOB: [redacted]



Nashville OSA Leader
[redacted]



Nashville OSA Leader
[redacted]



Former Director
[redacted]
DOB: [redacted]



[redacted]
DOB: [redacted]



[redacted]
DOB [redacted]



DOB: [redacted]



DOB: [redacted]



DOB: [redacted]



DOB: [redacted]



DOB: [redacted]



DOB: [redacted]



DOB: [redacted]



DOB: [redacted]



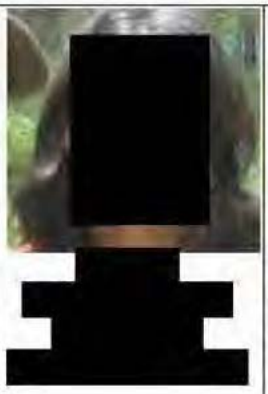
[redacted]



DOB: [redacted]

Arrested Blockaders Affiliated with OSA				
 **Heather Idoni**	 DOB:		 **Eva Zastrow** DOB:	 **Dennis Green** DOB:
 3/5/21			 (formerly)	
 **Paul Place**	 **James ("Jimmy") Zastrow**	 **Eva ("Oma") Edl** DOB:		

		 **Justin Phillips**	 **Joel Curry**	Minors: children of Dennis Green, children of Coleman Boyd, daughter of
Blockade Participants				
 **Coleman Boyd** Live Streams blockades, deploys his children to blockade.	 Live Streamer			

5/13/17 – Blockade of , Louisville, KY.
8/27/20 – Blockade of , Sterling Heights, MI.
1/15/21 – Blockade of , Little Rock, AR.
3/5/20 – Blockade of , Mt. Juliet, TN.
4/16/20 – Blockade of , Saginaw, MI.
1/27/20 – Blockade of , Ft. Meyers, FL.

EXHIBIT 101

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Klopf, Amanda (USATNM)" <[redacted]>
Subject: RE: Tomorrow's hearing
Date: Tue, 10 May 2022 11:39:20 -0400
Importance: Normal
Inline-Images: image001.png

Awesome.
Thanks, Amanda!

SP

From: Klopf, Amanda (USATNM) <[redacted]>
Sent: Monday, May 9, 2022 4:59 PM
To: Patel, Sanjay (CRT) <[redacted]>; Ramnaney, Nikhil (CRT) <[redacted]>
Cc: [redacted] (ME)"(FBI)" <[redacted]>
Subject: RE: Tomorrow's hearing

I was holding off turning edits until I heard back from [redacted] but hopefully I can get him on the phone tomorrow to run our questions to ground, and turn something around the same day.

From: Patel, Sanjay (CRT)" <[redacted]>
Sent: Sunday, May 8, 2022 12:43 PM
To: Klopf, Amanda (USATNM) <[redacted]>; Ramnaney, Nikhil (CRT) <[redacted]>
Cc: [redacted] (ME)"(FBI)" <[redacted]>
Subject: RE: Tomorrow's hearing

Hey, Amanda.
Happy Mother's Day!
Hope your family has made today special for you.
Thanks for the update.
Not sure if you spoke with [redacted], but I'm wondering why [redacted] and James Z were dismissed.
And, when do you think you can turn the memo around to us so that we send it up our chain?
June is jam packed for me, and I'd like to get the memo moving so that we can figure out what our likely target indictment date is.
Thanks!
SP

From: Klopf, Amanda (USATNM) <[redacted]>
Sent: Friday, May 6, 2022 5:09 PM
To: Patel, Sanjay (CRT) <[redacted]>; Ramnaney, Nikhil (CRT) <[redacted]>
Cc: [redacted] (ME)"(FBI)" <[redacted]>
Subject: FW: Tomorrow's hearing

Hot off the presses, here are the updates on the various players

From: [redacted] <[redacted]@tndagc.org>
Sent: Friday, May 6, 2022 4:06 PM
To: Klopf, Amanda (USATNM) <[redacted]>
Subject: [EXTERNAL] RE: Tomorrow's hearing

Sorry it has taken me so long to get back with you. Here is the status of the defendants charged:

Juvenile Defendants:
[redacted]

Adult Defendants:
Dennis Green [redacted]
[redacted]
James Zastrow [redacted]

Bound Over and Set for Jury Trial:
Eva Edl [redacted]
Chester Gallaher [redacted]
Heather Idoni [redacted]
Paul Place [redacted]
Calvin Zastrow [redacted]
Eva Zastrow [redacted]

Thankyou

[redacted]

From: Klopf, Amanda (USATNM) <[redacted]>
Sent: Friday, April 22, 2022 3:11 PM
To: [redacted] <[redacted]@tndagc.org>
Subject: RE: Tomorrow's hearing

[redacted]

Of all of these defendants, who was the one who ended up with Diversion?

Vaughn's PH is very helpful. On the recording, the ADA says something along the lines of "this is the last one." Did anyone else call witnesses for themselves or make argument like Vaughn did?

Thank you!
Amanda

From: [redacted] <[redacted]@tndagc.org>
Sent: Monday, March 14, 2022 1:54 PM
To: Klopf, Amanda (USATNM) <[redacted]>
Subject: [EXTERNAL] Re: Tomorrow's hearing

It went fine. All of the defendants are represented by an attorney named [redacted] who is not a particularly strong lawyer. They asked for trial dates and were set for trial in November, with a pre-trial motion date set in September.

Keep me posted

[redacted]

Get Outlook for iOS

From: Klopf, Amanda (USATNM) <[redacted]>
Sent: Monday, March 14, 2022 1:50:50 PM
To: [redacted] <[redacted]@tndagc.org>
Subject: RE: Tomorrow's hearing

[redacted]

How did last week's hearing go? we are still assessing where we are, but hopefully will have an answer soon.

Thank you!
Amanda

From: [redacted] <[redacted]@tndagc.org>
Sent: Friday, February 4, 2022 11:13 AM
To: Klopf, Amanda (USATNM) <[redacted]>
Subject: [EXTERNAL] Re: Tomorrow's hearing

Amanda,

Today did go smoothly. They protested on the sidewalk but did not cause a disruption.

The cases were continued to March 7, for a discussion date.

I am curious- is there any decision yet on your end about whether a federal charge is going to be sought? Any idea on that timeline? Keep me posted please.

Thank you

[redacted]

Get Outlook for iOS

From: Klopf, Amanda (USATNM) <[redacted]>
Sent: Friday, February 4, 2022 9:26:53 AM
To: [redacted] <[redacted]@tndagc.org>
Subject: RE: Tomorrow's hearing

I completely understand. I've shared your concerns with my team to be relayed.

I hope today goes as smoothly as possible.

Thank you
Amanda

From: [redacted] <[redacted]@tndagc.org>
Sent: Thursday, February 3, 2022 5:08 PM

To: Klopf, Amanda (USATNM) <[redacted]>
Subject: [EXTERNAL] Re: Tomorrow's hearing

Amanda,

I believe that the judge is expecting these defendants to be part of a protest tomorrow, which may be in the parking lot, may be in the lobby, and may be in the courtroom. Given those concerns, I believe that the court will only be permitting defendants in the courtroom. While the gentleman that you are referring to may come and be in the lobby, I anticipate that he may not get into the courtroom given the judge's limitation. Likewise, given the potential of protest, it may be a difficult crowd to be around. I would recommend that he not attend under these circumstances as I do not wish to escalate the situation however it is a public court house and I cannot prevent his entry but cannot assure that he will be permitted entry into the courtroom.

I hope this helps.

[redacted]

Get Outlook for iOS

From: Klopf, Amanda (USATNM) <[redacted]>
Sent: Thursday, February 3, 2022 4:36:44 PM
To: [redacted] <[redacted]@tndagc.org>
Subject: Tomorrow's hearing

[redacted],

I know that the [redacted] tresspassers have an arraignment tomorrow, and that the courtroom attendance may be limited. I understand that [redacted] would like to have Bobby Ledogar, NAF's South East Security Director, attend as their representative or witness to the proceedings. Would that be something that could be arranged?

If you have any questions, please let me know.

Thank you!

Amanda

Amanda J. Klopf
Assistant United States Attorney
Middle District of Tennessee
U.S. Attorney's Office | [redacted]
T: [redacted]
eMail: [redacted]

LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment may contain information that is privileged either legally or otherwise. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify me and delete this message.

EXHIBIT 102

From: Michelle Davidson <[redacted]@prochoice.org>
To: "Patel, Sanjay (CRT)" <[redacted]>
Subject: [EXTERNAL] Re: Check in?
Date: Wed, 09 Feb 2022 08:56:50 -0500
Importance: Normal

Yes to all of that! Talk to you later.

Stay safe,

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

image

[redacted]

Direct line:[redacted]

image

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

From: Patel, Sanjay (CRT)[redacted]
Sent: Wednesday, February 9, 2022 8:27:35 AM
To: Michelle Davidson [redacted]@prochoice.org>
Subject: RE: Check in?

Hi, Michelle –
Welcome back!
A tan must mean good times were had!
Looking fwd to hearing about the honeymoon.
I heard that Zastrow and gang were [redacted] in Little Rock.
But you probably have better information than I do.
Does today at 4:30pm work for a call?

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Tuesday, February 8, 2022 8:18 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: [EXTERNAL] Check in?

Hi Sanjay,

I'm back with a tan and a very full inbox. Hoping we can talk this week if you have a few minutes. I have some folks at Everytown for Gun Violence asking about FACE strategies that I want to get your opinion on, the Little Rock Blockade [redacted] outcome, and an update on the TN briefing to name a few. I know your inbox is like mine so anywhere you can squeeze me in, you always get priority on my calendar.

Hope your week is going well.

-Michelle

EXHIBIT 103

From: Michelle Davidson <[redacted]@prochoice.org>
To: [redacted]" <[redacted]>
Cc: "Cowall, Laura (CRT)" <[redacted]>, duVergne <[redacted]>, security <[redacted]@prochoice.org>
Subject: [EXTERNAL] RE: Facts for TRO
Date: Fri, 29 Jul 2022 12:58:31 -0400
Importance: Normal

Hi Everyone,

Just to update you – carafem has teamed up with Bass, Berry, and Simms along with the ACLU and we just completed the affidavits for the TRO. You can find drafts of both mine and [redacted] statement in the Dropbox link. Let me know that it works for you. This is exciting – I hope it happens. Fingers crossed.

*incident reports from staff and one patient are also in the Dropbox. I believe that the ACLU will be reaching out to Sanjay and Laura for input or at least keeping you updated. Let me know how we can help more.

We currently have eyes on those named in hopes of making serving easier today as quite a few of them are leaving town tomorrow.

Hope you all are doing well – I'm exhausted but got some energy/hope from this potential help. Go team.

-Michelle

From: Michelle Davidson
Sent: Thursday, July 28, 2022 9:52 PM
To: [redacted]
Cc: Cowall, Laura (CRT) <[redacted]>; duVergne [redacted]
Subject: FW: Facts for TRO

Forwarding for awareness and hopefully for good use.

-Michelle

From: Michelle Davidson
Sent: Thursday, July 28, 2022 9:55 PM
To: 'Stella Yarbrough' <[redacted]@aclu-tn.org>; Robert Ledogar [redacted]@prochoice.org>; Melissa Grant <[redacted]@carafem.org>; Kat Boyd' [redacted]@carafem.org>
Cc: Brigitte Amiri [redacted]@aclu.org>; Ryan Mendias' [redacted]@aclu.org>; security <[redacted]@prochoice.org>
Subject: RE: Facts for TRO

Hi Everyone,

The attached document has links to this Dropbox account. Please let me know if you have trouble opening it or any of the links.

-Michelle

From: Stella Yarbrough <[redacted]@aclu-tn.org>
Sent: Thursday, July 28, 2022 6:01 PM

To: Robert Ledogar <[redacted]@prochoice.org>; Melissa Grant <[redacted]@carafem.org>; Kat Boyd <[redacted]@carafem.org>
Cc: Michelle Davidson [redacted]@prochoice.org>; Brigitte Amiri <[redacted]@aclu.org>; Ryan Mendias <[redacted]@aclu.org>
Subject: Facts for TRO

Hi Robert and Michelle (and Melissa and Kat),

I was wondering if you all could help start typing out a narrative of what happened today so we can use that to develop your filings. We have local counsel to file but it looks like ACLU might be the one who is drafting.

Specifically, I need

- a narrative about OSA being present at the clinic (who, what when where); OSA people entering the building this week and today; MJPD not making arrests; and carafem clients being blocked from entering.
- the names of who from carafem could attest to the above and the names of people who you know to be active in OSA and who you want stopped by the court.
- any statements and their source (video, social media, in-person witness) about intent to come back, intent to "terrorize" the building, intent to escalate, etc.

Brigitte, Ryan, any other facts we may need?

From: Robert Ledogar [redacted]@prochoice.org>
Sent: Thursday, July 28, 2022 12:08 PM
To: Stella Yarbrough <[redacted]@aclu-tn.org>
Subject: Carafes - Invasion/Blockade

Stella,

I was just informed that 3 adults made entry into the building to the 2nd floor into the hallway of the entrance door of Carafem. They did not make entry into Carafem.
My Juliet Police are on scene.
FBI agent notified.
M/TN AUSA notified.

Bobby

Get Outlook for iOS

EXHIBIT 104

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Dean, Kerry K (CRT)" <[redacted]>
Subject: RE: Nashville
Date: Mon, 01 Aug 2022 18:38:50 -0400
Importance: Normal

Hi, Kerry"–
Sorry for the late response [redacted]
The weekend was surprisingly quiet.
No incidents at either clinic.
I understand and agree with your thoughts.
Perhaps we'll find out more at the call tomorrow.
SP

From: Dean, Kerry K (CRT)"<[redacted]>
Sent: Monday, August 1, 2022 4:38 PM
To: Patel, Sanjay (CRT)"<[redacted]>
Subject: RE: Nashville

Hi Sanjay,

It doesn't look like anyhing materialized over the weekend in terms of obstruction, is that right? I didn't find anything in my general news searches. We drafted an SOI, but aren't exactly sure how to proceed given the posture – it would have been easier if the judge hadn't granted the TRO so quickly, but I'm certainly glad she did. They didn't raise the March 2021 blockade in their pleadings or very specific statements about OSA wanted to escalate and continue obstruction after the rally and up until Aug. 25, and we generally don't add facts in an SOI. Civil FACE doesn't give us any remedies that they cannot get, so I'm not sure filing our own suit makes sense. I would love to file an SOI to show our support, but we're just trying to work it through.

Thanks,
Kerry

From: Brigitte Amiri <[redacted]@aclu.org>
Sent: Monday, August 1, 2022 2:49 PM
To: Dean, Kerry K (CRT)"<[redacted]>; Ryan Mendias"<[redacted]@aclu.org>; Patel, Sanjay (CRT) <[redacted]>; [redacted]@bassberry.com; [redacted]@bassberry.com; [redacted]@bassberry.com; Stella Yarbrough"<[redacted]@aclu-tn.org>
Subject: [EXTERNAL] Re: Nashville

Thanks, everyone. As you see in the order, there will be a hearing on Aug. 5 at 9 a.m. We understand that at least some of the defendants will be present. We assume but are confirming that the judge will want live witnesses.

If you are able to file a statement of interest, are you able to do so before the hearing? Or send an AUSA to make that statement on the record? We also hope you are also considering joining the suit, and we also want to raise that this issue will continue to come up with OSA and these individuals - we'll send you the social media posts, but we understand that they will be targeting clinics in NM, MA, and IL, etc.

Also, if there are live witnesses, we are concerned about the safety of our clients, and will be reaching out to the court to discuss options for security to enter the courthouse.

If the defendants violate the order, and are found in contempt, will the Marshals be able to enforce the contempt?

Thank you,
Brigitte

From: Dean, Kerry K (CRT)[redacted>
Sent: Friday, July 29, 2022 9:44 PM
To: Brigitte Amiri <[redacted]@aclu.org>; Ryan Mendias <[redacted]@aclu.org>; Patel, Sanjay (CRT)[redacted>; [redacted]@bassberry.com <[redacted]>; [redacted]@bassberry.com <[redacted]>; [redacted]@bassberry.com <[redacted]>; Stella Yarbrough <[redacted]@aclu-tn.org>
Subject: RE: Nashville

Wow. Congratulations! We will be in touch about what we can do.

From: Brigitte Amiri <[redacted]@aclu.org>
Sent: Friday, July 29, 2022 7:10 PM
To: Dean, Kerry K (CRT)[redacted>; Ryan Mendias <[redacted]@aclu.org>; Patel, Sanjay (CRT) <[redacted]>; [redacted]@bassberry.com; [redacted]@bassberry.com; [redacted]@bassberry.com; Stella Yarbrough <[redacted]@aclu-tn.org>
Subject: [EXTERNAL] Re: Nashville

Thanks all. The judge called the attorneys at Bass Berry late afternoon, and just issued the attached order. If there is anything you are able to do to be supportive, we'd appreciate it.

From: Dean, Kerry K (CRT)[redacted>
Sent: Friday, July 29, 2022 3:39 PM
To: Brigitte Amiri <[redacted]@aclu.org>; Ryan Mendias <[redacted]@aclu.org>; Patel, Sanjay (CRT)[redacted>; [redacted]@bassberry.com <[redacted]>; [redacted]@bassberry.com <[redacted]>; [redacted]@bassberry.com <[redacted]>; StellaYarbroughn[redacted]@aclu-tn.org>
Subject: RE: Nashville

Hi Brigitte,

Thanks so much for keeping us in the loop. Definitely let us know when a hearing will be and we will try to have someone attend. I do not think anyone would participate yet as we are still assessing what we can do.

Thanks,
Kerry

From: Brigitte Amiri <[redacted]@aclu.org>
Sent: Friday, July 29, 2022 3:30 PM
To: Ryan Mendias <[redacted]@aclu.org>; Patel, Sanjay (CRT) <[redacted]>; Dean, Kerry K (CRT) <[redacted]>; [redacted]@bassberry.com; [redacted]@bassberry.com; [redacted]@bassberry.com; Stella Yarbrough <[redacted]@aclu-tn.org>
Subject: [EXTERNAL] Re: Nashville

Thanks all. Sanjay & Kerry - we will let you know when we have a case number and when a hearing is scheduled. Please let us know if an AUSA will be able to come and/or whether you'll be able to file a statement

of interest.

From: Ryan Mendias <[redacted]@aclu.org>
Sent: Friday, July 29, 2022 2:57 PM
To: Brigitte Amiri <[redacted]@aclu.org>; Patel, Sanjay (CRT)"<[redacted]>; Dean, Kerry K (CRT) <[redacted]>; [redacted]@bassberry.com <[redacted]>; [redacted]@bassberry.com <[redacted]@bassberry.com>; [redacted]@bassberry.com <[redacted]>; Stella Yarbrough"<[redacted]@aclu-tn.org>
Subject: RE: Nashville

Hello all,

Attached are the pleadings that are being filed today in carafem's FACE Act action.

Best,
Ryan

From: Brigitte Amiri <[redacted]@aclu.org>
Sent: Friday, July 29, 2022 1:27 PM
To: Patel, Sanjay (CRT)<[redacted]>; Dean, Kerry K (CRT)"<[redacted]>; Ryan Mendias <[redacted]@aclu.org>; [redacted]@bassberry.com; [redacted]@bassberry.com; [redacted]@bassberry.com; Stella Yarbrough <[redacted]@aclu-tn.org>
Subject: Re: Nashville

And here is a Dropbox of video and pictures: [redacted]

Brigitte

On Jul 29, 2022, at 11:53 AM, Brigitte Amiri <[redacted]@aclu.org> wrote:

Thank you, Sanjay. I'm also adding Ryan from my office, Stella from the ACLU of TN, and Angie, Allison, and Sarah from Bass Berry, who are bringing the case. We'll send drafts of the pleadings as soon as we can. We are trying to get a hearing today - if it gets set, could an AUSA be present?

Thank you,
Brigitte

From: Patel, Sanjay (CRT)"<[redacted]>
Sent: Friday, July 29, 2022 10:32 AM
To: Brigitte Amiri <[redacted]@aclu.org>; Dean, Kerry K (CRT)"<[redacted]>
Subject: RE: Nashville

Connecting Kerry on this thread so she has Brigitte's cell.

From: Brigitte Amiri <[redacted]@aclu.org>
Sent: Friday, July 29, 2022 9:54 AM
To: Patel, Sanjay (CRT)"<[redacted]>
Subject: [EXTERNAL] Re: Nashville

Yes, thank you. Feel free to call my cell phone - [redacted].

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Friday, July 29, 2022 9:53 AM
To: Brigitte Amiri <[redacted]@aclu.org>
Subject: Nashville

Good morning, Brigitte --
I'm following up with you about the events in Nashville, and potential civil action by the ACLU.
Do you have time for a call today?
Sanjay

Sanjay Patel
Director
National Task Force on Violence Against Reproductive Health Care Providers
Criminal Section
Civil Rights Division
U.S. Department of Justice
[redacted]

EXHIBIT 105

From: "Fitzgerald, Paige (CRT)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: Reference Request
Date: Wed, 30 Dec 2020 14:17:36 -0500
Importance: Normal
Inline-Images: image001.jpg

Hi, Sanjay!–

Sorry for the delayed response, and hope you are having a happy holiday season.

Re: the request for a reference, do you know what you would be asked to opine on? I don't know what we would be able to say. Once you know what you would be asked about, we should probably ask our ethics person, John Buchko, what we are allowed to do/say re: an NGO with whom we interact.

Thanks,
Paige

From: Patel, Sanjay (CRT)
Sent: Wednesday, December 23, 2020 11:05 AM
To: Fitzgerald, Paige (CRT) <[redacted]>
Subject: FW: Reference Request

Hi, Paige.
Just following up on my below email.
Unless you disagree, I'll have NAF use me as their reference for their grant application.
Thanks.
SP

From: Patel, Sanjay (CRT)
Sent: Friday, December 18, 2020 11:25 AM
To: Fitzgerald, Paige (CRT) <[redacted]>
Subject: FW: Reference Request

Hi, Paige–
NAF has asked if they could list you as a reference for a fund proposal (that supports, among other things, their training and threat monitoring services).
It looks like they may be able to list me in your place.
Do you have a preference either way?
I would suggest using me.
Thanks.
SP

From: Tara Gannon <[redacted]@prochoice.org>
Sent: Thursday, December 17, 2020 3:19 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: Reference Request

Hi Sanjay,

The NAF Security team is working with a funder, the Lisa and Douglas Goldman Fund, to help cover the cost of security activities within our department. This includes, but is not limited to, travel costs to provide member training – active shooter, bomb threats, domestic violence in a reproductive health setting, etc. It also includes the annual fee we pay MSA for their online threat monitoring services.

We need to provide five references to the Lisa and Douglas Goldman Fund for our proposal. We previously listed Julie Abbate when she was at DOJ. Can you ask Paige if she would be ok being a reference for us? I'm not 100% sure the Foundation will contact her since they know us, butthey might. It would be confidential—the only place her name would be listed would be in the proposal we send them. It would not be published. They are a very pro-choice, friendly foundation.

If you think it makes more sense to list you as a reference, we can do that as well. Melissa Fowler (our VP) reached out to me and specifically asked about Paige"– but I will defer to you on that.

Thanks and I hope you are well,

Tara Gannon
Senior Director, Security
National Abortion Federation

(T) [redacted]
(E) [redacted]@prochoice.org

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 106

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Tara Gannon" <[redacted]@prochoice.org>
Subject: RE: Reference Request
Date: Wed, 23 Dec 2020 11:06:11 -0500
Importance: Normal
Inline-Images: image001.jpg

Hi, Tara –
I'm so sorry for the delayed response.
Feel free to use me as a reference.
If you all would rather use Paige, let me know so that I can get her approval.
Thanks, and Happy Holidays!
SP

From: Tara Gannon <[redacted]@prochoice.org>
Sent: Thursday, December 17, 2020 3:19 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: Reference Request

Hi Sanjay,

The NAF Security team is working with a funder, the Lisa and Douglas Goldman Fund, to help cover the cost of security activities within our department. This includes, but is not limited to, travel costs to provide member training – active shooter, bomb threats, domestic violence in a reproductive health setting, etc. It also includes the annual fee we pay MSA for their online threat monitoring services.

We need to provide five references to the Lisa and Douglas Goldman Fund for our proposal. We previously listed Julie Abbate when she was at DOJ. Can you ask Paige if she would be ok being a reference for us? I'm not 100% sure the Foundation will contact her since they know us, but they might. It would be confidential—the only place her name would be listed would be in the proposal we send them. It would not be published. They are a very pro-choice, friendly foundation.

If you think it makes more sense to list you as a reference, we can do that as well. [redacted] (our VP) reached out to me and specifically asked about Paige – but I will defer to you on that.

Thanks and I hope you are well,

Tara Gannon
Senior Director, Security
National Abortion Federation

(T) [redacted]
(E) [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is

prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 107

From: Michelle Davidson <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Subject: [EXTERNAL] Re: Request
Date: Tue, 31 Oct 2023 13:06:04 -0400
Importance: Normal
Inline-Images: image001.png

No worries and thanks for the update! Let me know what Paige says. Thank you!

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Tuesday, October 31, 2023 11:45 AM
To: Michelle Davidson <[redacted]>
Subject: RE: Request

Hey!
So sorry this fell off my radar.
I just sent Paige a ping to see what her thoughts are.
I'll get back to you later today once I hear back from her (

As for trial, you might remember that it was a bench trial.
We wrapped up on Friday with closings, and the judge took the matter under advisement.
She is hoping to have a verdict by or before Nov 8.

From: Michelle Davidson <[redacted]>
Sent: Tuesday, October 31, 2023 11:29 AM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: [EXTERNAL] Re: Request

Hey Sanjay,

How did the trial go? Any word from Paige about the request? It's due tomorrow so I'm getting hounded by the boss. Sorry - I know you're slammed. Let me know!

-MD

From: Michelle Davidson <[redacted]>
Sent: Wednesday, October 25, 2023 8:16 AM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: Re: Request

Absolutely. Let me know if you have an idea of when the jury might have a verdict. I'd love to be there for at least one guilty announcement! I know those are hard to gauge though.

Stay safe,

Michelle Davidson
Director, Security

Pronouns: Any of them (no preference)
or just Michelle


NAF Security
[redacted]
Washington, DC 20005
Direct line: [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

Sent from my T-Mobile 5G Device
Get Outlook for Android

From: Patel, Sanjay (CRT) "<[redacted]
Sent: Wednesday, October 25, 2023 5:53:02 AM
To: Michelle Davidson <[redacted]>
Subject: RE: Request

GM Michelle!
Can we chat a bit more about this after my trial is over.
We're in the middle of trial for the final DC defendant (Harlow).
And, I would have to get permission from Paige to write a statement for you (which you know I am otherwise happy to do for you).
Should be done with trial on Thurs or Fri.
SP

From: Michelle Davidson <[redacted]>
Sent: Tuesday, October 24, 2023 5:37 PM
To: Patel, Sanjay (CRT) "<[redacted]
Subject: [EXTERNAL] Request
Importance: High

Hey Sanjay,

I have a request that I hope you could squeeze into your very busy schedule. We have the opportunity to submit a proposal for grant funds that would support the already existing security work I do in the DMV for providers. I'm hoping you could write a short impact statement, on DOJ letterhead, and in your own words, on the importance of the NAF Security Departments work and the impact on provider safety in the DMV. You could also talk about how we work together and some of the outcomes of our efforts if you feel inclined.

I know you have a lot going on but a statement from you would have a big impact on the proposal. It's due next Tuesday so of course, like with everything else these days, a big rush. I also completely understand if it's not possible so don't worry or stress - just let me know.

Hope your good - looking forward to any updates on the next trial you may have. Let's chat soon!

-M

Michelle Davidson

Director, Security
Pronouns: Any (no preference) or just Michelle

NAF Security
[redacted]
Annapolis Junction, MD
20701-0416
[redacted]
Direct line: [redacted]
**This line is not reliable for text message use*

"Don't ever let them steal your joy" - Brandi Carlile

I respect that your working hours may be different from mine and I support your healthy work/life boundaries. Only respond when you have the time and capacity.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 108

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Jodie Bell" <[redacted]>
Cc: "Ramnaney, Nikhil (CRT)" <[redacted]>, "Klopf, Amanda (USATNM)" <[redacted]>
Subject: RE: US v. Gallagher
Date: Wed, 22 Feb 2023 18:29:13 -0500
Importance: Normal

Hi, Jodie–

Thanks again for reaching out and following up on your earlier request for information related to your expected motion.
As the national clinic violence coordinator, I do not keep the kind of records you have requested and, as a result, I do not believe that we will provide them to you.
However, I expect that much of what you seek is publicly available.
For example, there are press releases on the DOJ's public website that address FACE Act prosecutions.
With those press releases, you would be able to obtain additional materials through the courts' online databases.

Thanks,
Sanjay Patel

From: Jodie Bell <[redacted]>
Sent: Tuesday, February 21, 2023 3:52 PM
To: Patel, Sanjay (CRT)" <[redacted]>
Cc: Patel, Sanjay (CRT) <[redacted]>; Ramnaney, Nikhil (CRT) <[redacted]>; Klopf, Amanda (USATNM)" <[redacted]>
Subject: [EXTERNAL] Re: US v. Gallagher

Mr. Patel and Ms. Ramnaney"– I am reaching out because I am hearing that Mr. Gallagher may have another federal indictment in Michigan. If this is the case, will you please let me know and he will promptly turn himself in on that indictment. I checked PACER to see if anything was filed, but I could not see anything. If the indictment is sealed, I guess that would explain why.

If there are any indictments in any districts, simply let me know and Mr. Gallagher will turn himself in. He is committed to appearing in Court and complying with any rules of pretrial release.

Also, I am still waiting to hear back on the request for the number of FACE Act criminal prosecutions following the Dobbs decision, as well as the number of any prosecutions for vandalisms of pregnancy centers. I need this information for the pretrial motion filing deadline next week.

Thanks, Jodie Bell

Jodie Ann Bell
Attorney at Law
[redacted]
facsimile

[redacted]

LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment may contain information that is privileged either legally or otherwise. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy, or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify me and delete this message.

From: Klopf, Amanda (USATNM) <[redacted]>
Date: Sunday, February 19, 2023 at 12:24 PM
To: Jodie Bell <[redacted]>
Cc: Patel, Sanjay (CRT) <[redacted]>, Ramnaney, Nikhil (CRT) <[redacted]>
Subject: RE: US v. Gallagher

Jodie,

I am unexpectedly tied up in what looks to be a 5 week long trial. I've cc'ed my counterparts on here

Thanks
Amanda

From: Jodie Bell <[redacted]>
Sent: Sunday, February 19, 2023 11:51 AM
To: Klopf, Amanda (USATNM) <[redacted]>
Subject: [EXTERNAL] Re: US v. Gallagher

Amanda – Just circling back around on the below email to see if you or the DOJ attorneys can answer the first question about FACE act prosecutions and prosecutions of pregnancy centers. Our initial pretrial motion filing is approaching.
Thanks, Jodie

Jodie Ann Bell
Attorney at Law
[redacted]
facsimile

LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment may contain information that is privileged either legally or otherwise. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy, or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify me and delete this message.

From: Klopf, Amanda (USATNM) <[redacted]>
Date: Friday, February 3, 2023 at 4:09 PM
To: Jodie Bell <[redacted]>
Subject: RE: US v. Gallagher

Jodie,

I'm sorry for the delay in getting back to you.

I'm going to have to get back to you on your first question.

On your sec ond question, this is an interesting quirk of this discovery–the recordings are embedded in the PDF. If you go to the PDF that references the recordings, which I believe should be stamped 000942, and hover your mouse over the green triangles, it acts as a "play" button. Let me know if you have issues with it.

Thank you
Amanda

From: Jodie Bell <[redacted]>
Sent: Friday, January 27, 2023 12:47 PM
To: Klopf, Amanda (USATNM) <[redacted]>
Subject: [EXTERNAL] US v. Gallagher

Hi Amanda – I am currently looking into some of pretrial motions in the Gallagher case and was hoping you and your co-counsel can help me out. I am curious about how many FACE act criminal prosecutions there have been in the last ten years, including both reproduc tive right clinics, churc hes etc. As for pregnancy crisis clinics (the pro-life clinics), how many federal prosecutions have there been for any crimes have related to bombings and vandalisms of these plac es. It is no sec ret that we will likely make a selective prosec ution type argument and I anticipate Judge Trauger will ask this question. I would think the DOJ would keep track of this. Please let me know what you or your co-counsel know about this.

Also, I opened a file in the discovery on the [redacted] and the file seems to make reference to a recording that is not there. I would think since my client was convicted and then appealed that there would be a recording of the initial trial, did you pull it? Is it in discovery and I'm missing it?

Thanks muc h, Jodie Bell

Jodie Ann Bell
Attorney at Law
[redacted]
facsimile

LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment may contain information that is privileged either legally or otherwise. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy, or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify me and delete this message.

EXHIBIT 109

From: "Miller, Angela (CRT)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Cc: "Gamondi, Cristina (CRT)" <[redacted]>
Subject: 248.Consolidated.October 2022.xlsx
Date: Wed, 19 Octt2022 10:18:55 -0400
Importance: Normal
Attachments: 248.Consolidated.October_2022.xlsx

Sanjay– Before I share to the one drive, is this what you are looking for (granted, it may have some additional information, too)? The orange highlights at the top are things that Remy can fill out, provided he can find the information. Would this work?

Angela

Case Name	Defendants' names	# of defendants	District	Docket Number	Year Filed	Offense Date	Charging Date	Charges	Status	Outcome	Sentence	Filings	Filings	Decisions	Decisions	Press Releases	Add'l Press Releases
US v. CHESTER GALLAGHER, ET AL	CHESTER GALLAGHER; HEATHER IDON; CALVIN ZASTROW; COLEMAN BOYD; CAROLINE DAVIS; PAUL VAUGHN; DENNIS GREEN; EVA EDL; EVA ZASTROW; JAMES ZASTROW; PAUL PLACE	11	MDTN	3 22CR327	2022	2.10.2021 to 3.5.2021; 3.5.2021	10.3.2022	241(248(c)); 248(a)(1)	PENDING			10.3.2022 (Indictment)				Eleven Defendants Indicted for Obstructing a Reproductive Health Services Facility in Tennessee | OPA | Department of Justice	
US v. CHRISTOPHER MOSCINSKI		1	EDNY	22CR1052	2022	7.7.2022	9.28.2022	248(a)(1)	PENDING			9.28.2022 (Complaint)				Defendant Charged with Blocking Access to Planned Parenthood Health Center on Long Island | USAO-EDNY | Department of Justice	
US v. MARK HOUCK		1	EDPA	2 22CR323	2022	10.13.2021	9.22.2022	248(a)(1), (b)(1), (c)(2)	PENDING			9.22.2022 (Indictment)				Bucks County Man Indicted on Federal Charges for Assaulting a Reproductive Healthcare Clinic Escort | USAO-EDPA | Department of Justice	
US v. LAUREN HANDY, ET AL	LAUREN HANDY; JONATHAN DARNEL; JAY SMITH (AKA JUANITO PICHARDO); PAULA "PAULETTE" HARLOW; JEAN MARSHALL; HOHN HINSHAW; HEATHER IDON; WILLIAM GOODMAN; JOAN BELL; HERB GERAGHTY	10	DDC	1 22CR96	2022	10.7.2020 to 10.22.2020 10.22.2020	3.24.2022; 10.14.2022	241(248(c)); 248(a)(1)	PENDING			3.24.2022 (Indictment)	10.14.2022 (SS. Indictment)			Nine Defendants Indicted on Federal Civil Rights, Conspiracy and Freedom of Access to Clinic Entrances Act (FACE Act) Offenses for Obstructing Patients and Providers of a Reproductive Health Services Facility | OPA | Department of Justice	Pennsylvania Man Indicted on Freedom of Access to Clinic Entrances Act and Conspiracy Against Rights, Offenses for Obstruction at Reproductive Health Services Facility | OPA | Department of Justice
US v. RICHARD CHAMBERLIN		1	CDCA	2 22CR36	2022	3.30.2021; 5.7.2021; 6.20202 to 5.7.2021; 5.7.2021 1.28.2022	2.11.2022	248(a)(1) 922(g)	PENDING (trial 2.7.2023)			2.11.2022 (Indictment)				Grand Jury Indicts Disrobed Felon Who Allegedly Fired BB Guns at Planned Parenthood in Pasadena with Violating FACE Act | USAO-CDCA | Department of Justice	
US v. DEVIN KRUSE		1	DOR	1 22CR64	2022	11.23.2021 11.26.2021	2.24.2022	248(a)(3)	PLEA 9.19.2022 248			2.24.2022 (Info)				Oregon Man Pleads Guilty for Planned Parenthood Property Destruction | OPA | Department of Justice	
US v. DANIEL COURNEY		1	DNJ	2 21MJ15452	2021	10.16.2021 10.30.2021	12.2.2021	248(A)(1)	DISMISSED; AGREEMENT 10.3.2022			12.2.2021 (Info)	US Trial Brief			Bergen County Man Arrested for Interfering with Reproductive Health Services | USAO-NJ | Department of Justice	Justice Department Secures Agreement to Protect Access to Reproductive Health Services | OPA | Department of Justice
US v. CARLOS BRIME		1	SDOH	2 21CR171	2021			248(a)(1) 875 844	PLEA 248 & 875		12 months. 1 day						
US v. EVERETT LITTLE		1	MDFL	2 21CR40	2021			248(a)(3)	PLEA 248		8 months						
US V. JAMES GUUCK		1	DDE	1 21CR1	2020												
US v. RODNEY ALLEN		1	MDFL	3 19CR186	2019			248(a)(1); 844	PLEA; 1001 & 248		24 months						
US v. ROBERT DEAR		1	DCO	1 15CR506	2019												
US v. MARIA TERRY		1	EDMO	4 19CR2799	2019												
US v. WESLEY KASTER		1	WDMO	2 19CR4031	2019												
US v. PHILLIP MILLS		1	WDTX	3 18MJ5256	2018												
US v. EMILY HARI		1	CDIL	2 18CR20014	2018												
US v. LUKE WIERSMA		1	NDIL	1 18CR88	2018												
US v. ROBERT KLIMA		1	DAK	3 16CR130	2016												
US v. CHARLES MILLER		1	DMD	1 16CR520	2016												
US v. TRAVIS REYNOLDS		1	DMD	1 16CM490	2016												
US v. STOUT		1	WDMO	3 13CR5054													
US v. MICHAEL HARRIS		1	DMN	0 16MJ81	2016												
US v. DAVID CURRELL		1	SDIN	1 14CR88	2014												
US v. CHRISTIAN		1	EDVA	1 12MJ645	2012												
US v. FRANCIS GRADY		1	EDWI	1 12CR77	2012												
US v. BOBBY ROGERS		1	NDFL	3 12CR18	2012			248(a)(3) 844	PLEA 248 & 844		120 months						
US v. LANG		1	EDWI	3 12CR43	2011												
US v. DONNY MOWER		1	EDCA	1 11CR308	2011												
US v. HOLMANDER		1	DMA	1 11CR10072	2011												
US v. JUSTIN MOOSE		1	MDNC	1 10CR358	2010												
US v. THEODORE PUCKETT, ET AL			SDNY	1 10CR6	2010												
US v. ERLYNDON LO		1	NDTX	3 10CR110	2010												
US v. FREEMAN		1	DOR	6 09CR01548	2009												
US v. HERTZ		1	DCO	1 09CR384	2009												
US v. ALEXIS KEISER		1	WDMO	2 08CR4035	2008												
US v. SERGIO BACA, ET AL.			DNM	1 08CR144	2008												
US v. EVANS		1	WDTX	1 07CR98	2007												
US v. BURKE		1	DKS	2 07CR20014	2007												
US v. RICHARD REESE		1	MDFL	3 06CR362	2006			248(a)(3)	PLEA 248		48 months prob.						
US v. WEILER		1	DMD	8 06CR279	2006												
US v. McMENIMY		1	SDIA	2 06CR576	2006												
US v. WESLIN		1	DNE	8 06CR165	2006							US Brief			156 F.3d 292 (2d 1998)		
US v. SKINNER		1	NDAL	7 06CR186	2006												
US v. PATINO		1	NDOH	3 05MJ7116	2005												
US v. JORDI		1	SDFL	0 03CR60259	2004												
US v. FERGUSON		1	NDTX	4 03CR1878	2003												
US v. LOCASCIO		1	EDNC	4 03MJ23	2003												
US v. BIRD		1	SDTX	4 03CR163	2003							US Brief (Bird I)	US Brief (Bird II)	124 F.3d 667 (5th 1997)	401 F.3d 633 (5th 2005)		
US v. PHILLIPOS		1	WDNC	1 03CR14	2003												
US v. WAAGNER		1	EDPA	2 02CR582	2002												
US v. MACDONALD		1	EDAR	4 02CR109	2002												
US v. NICHOLAS MORENCY		1	DNJ	1 01CR158	2001			248	PLEA		30 months						
US v. MARRA, ET AL.			WDNY	1 01CR60	2001												
US v. KOPP		1	WDNY	1 00CR189	2000												
US v. WILLIAMS, ET AL.			EDCA	2 00CR139	2000												
US v. REECE		1	NDMS	1 00CR110	2000												
US v. EMMETT		1	DUT	209SCR557	1999												
US v. KELLY		1	NDFL	1 99CR58	1999												
US v. McDONALD		1	DNM	1 99CR566	1999/2001												
US v. UPHOFF		1	DSD	4 99CR60061	1999												
US v. HANSON		1	DND	1 99CR10	1999												
US v. MAHADY		1	MDPA	1 98CR302	1998												
US v. BURKE		1	DKS	2 98CR20069	1998												
US v. WALTZ, ET AL.			DSC	2 98CR577	1998												
US v. HART		1	EDAR	4 98CR132	1998							US Brief		232 F.3d 1067 (8th 2000)			
US v. CABANISS		1	WDOK	5 98CR40	1998												
US v. CHANDLER		1	SDMS	3 97CR87	1997												
US v. ANDREWS		1	EDCA	2 97CR288	1997												
US v. MITCHELL		1	EDVA	1 97CR219	1997												
US v. YANKOWSKI		1	DMT	2 97CR3	1997												
US v. HOWARD		1	EDCA	1 97CR5084	1997												
US v. WESLIN, ET AL.			WDNY	6 96MJ629	1997												
US v. WILSON, ET AL.			EDWI	2 96CR189	1996			371 248(a)(1)									
US v. MCMANUS		1	DMA	4 96CR40019	1996												
US v. DINWIDDIE		1	WDMO	95-6010-CV	1996			CIVIL / Prelim. Inj.						76 F.3d 913 (8th 1996)			
US v. SPERLE, ET AL.			EDVA	4 96CR18	1996												
US v. McMILLAN		1	SDMS	3 95CV633	1995			CIVIL / Prelim. Inj.						936 F. Supp. 1254 (SDMS 1996)			
US v. SHANNON		1	EDCA	2 95CR542	1995												
US v. EMBRY		1	WDKY	4 95CR17	1995												
US v. ROBERT COOK		1	EDWI	2 95CR168	1995												
US v. VINCENT WHITAKER		1	WDWI	3 95CR55	1995												
US v. BLACKBURN		1	DMT	6 95CR16	1995												
US v. MIENA, ET AL.			NDNY	5 95CR144	1995												
US v. MATHISON		1	EDWA	2 95CR85	1995												
US v. BIRD		1	SDTX	4 95CR71	1995												
US v. LUCERO, ET AL.			DKS	6 95CR10036	1995												
US v. PRIESTLEY			DOR	6 95CR60035	1995												
US v. OLSON, ET AL.			SDFL	9 95CR8025	1995												
US v. McDONALD		1	DNM	1 95MJ02120	1995												
US v. LANG		1	NDAL	5 95CR16	1995												
US v. WILSON, ET AL.			EDWI	2 94CR140	1994			248(a)(1)						73 F.3d 675 (7th 1995)			
US v. BROCK, ET AL.			EDWI	2 94CR86	1994			248(a)(1)	Bench trial		30 dy.- 6 months	US Cip cert		83 F.3d 1170 (7th 1996)			
US v. PAUL HILL		1	NDFL	3 94CR1118	1994			248(a)(1) 924			Life						

EXHIBIT 110

From: [redacted] <[redacted]>
To: "[redacted]" <[redacted]>, "[redacted]" <[redacted]>
Cc: [redacted] <[redacted]>, [redacted] <[redacted]>, "[redacted]" <[redacted]>
Subject: RE: FACE Act cases with Pro-L, Pro-C breakdown
Date: Fri, 31 May 2024 09:13:55 -0400
Importance: Normal
Attachments: FACE_Act_Case_Tracker_FY_17_-present.5.29.2024.xlsx

---

Good morning,

Please see attached spreadsheet for FACE ACT Fis, PIs, and Assessments, the bi-weekly data pull was completed Wednesday. Moving forth, I will send the reports monthly per the email below.

Thank you,

MAPA [redacted]
Criminal Investigative Division
PCCRS/Civil Rights Unit
[redacted] (Desk) | [redacted] (Cell)

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Wednesday, May 8, 2024 2:47 PM
To: [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>; Channapati, Anita (CRT) <[redacted]>
Cc: [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>
Subject: [EXTERNAL EMAIL] - RE: FACE Act cases with Pro-L, Pro-C breakdown

Hi [redacted] –
Whatever is more convenient.
If no difference, monthly works.
Thanks!
SP

From: [redacted] <[redacted]>
Sent: Tuesday, May 7, 2024 3:11 PM
To: [redacted] (CID) (FBI) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>; Channapati, Anita (CRT) <[redacted]>
Cc: [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>
Subject: RE: FACE Act cases with Pro-L, Pro-C breakdown

Good afternoon all,

Sanjay and Anita, we previously provided an updated list of FACE Act investigations. [redacted] updates the list bi-weekly and wanted to know if you wanted the bi-weekly updates or monthly updates moving forward?

We rather not inundate your emails but wanted to know your preference moving forward.

Respectfully,

[redacted]

From: [redacted] (CID) (FBI) <[redacted]>
Sent: Friday, April 5, 2024 1:04 PM
To: Patel, Sanjay (CRT) <[redacted]>; Channapati, Anita (CRT) <[redacted]>
Cc: [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>
Subject: FACE Act cases with Pro-L, Pro-C breakdown

Good afternoon,

Please see attached spreadsheet (Read-Only). The FACE Act Tracker is updated bi-weekly for Full & Preliminary Investigations and Assessments. The last data pull was Wednesday, 4/3 for updates through **Tuesday, 4/2**.

Thank you,

MAPA [redacted]
Criminal Investigative Division
PCCRS/Civil Rights Unit
[redacted] (Desk) | [redacted] (Cell)

From: [redacted] (CID) (FBI) <[redacted]>
Sent: Thursday, April 4, 2024 2:28 PM
To: Patel, Sanjay (CRT) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>; Channapati, Anita (CRT) <[redacted]>
Subject: RE: FACE Act cases with Pro-L, Pro-C breakdown

Good Afternoon All,

I apologize for the oversight. Thank you for bringing it to my attention. I misspelled [redacted]'s name. [redacted] will send out an update tomorrow.

[redacted]

From: [redacted] (CID) (FBI)
Sent: Thursday, April 4, 2024 1:38 PM
To: Patel, Sanjay (CRT) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>
Cc: Channapati, Anita (CRT) <[redacted]>
Subject: RE: FACE Act cases with Pro-L, Pro-C breakdown

Sanjay,

Thanks for reaching out. I believe [redacted] just updated our spreadsheet. I cc'd her on this email.

Respectfully,

[redacted]

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Thursday, April 4, 2024 12:15 PM
To: [redacted] (CID) (FBI) <[redacted]>; [redacted] (CID) (FBI) <[redacted]>

Cc: Channapati, Anita (CRT) <[redacted]>
Subject: [EXTERNAL EMAIL] - FW: FACE Act cases with Pro-L, Pro-C breakdown

Hi, [redacted] and [redacted] –
Thanks for sharing at today's meeting.

Wondering if we can get an updated matter tracking list?
Attached is the latest one I have from last Aug.

As new investigations are added to the list (open or assess), can you pass them along to me and Anita please?

Thanks!
SP

From: [redacted] <[redacted]>
Sent: Monday, August 14, 2023 1:00 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: FACE Act cases with Pro-L, Pro-C breakdown

Hi Sanjay-

Attached is a list of all our Civil Rights FACE Act cases as of 8/4/2023 with an additional column to identify if the victim is Pro-life or Pro-choice.

Of the 60 total cases, there are 22 where the victim(s) are Pro-life, and 38 where the victim(s) are Pro-Choice.

Following Dobbs, the percentage was reversed from what it is now.

Please let me know if there are questions.
Thanks!
~[redacted]

SSA [redacted]
Civil Rights Unit
FBI[redacted]
[redacted] Desk
[redacted] Cell

EXHIBIT 111

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Felte, James (CRT)" <[redacted]>, "Miller, Angela (CRT)" <[redacted]>
Subject: RE: question, AG hearing prep
Date: Tue, 28 May 2024 12:03:49 -0400
Importance: Normal

[redacted] correct. US v. Durant. 23-mj-08003 (NDOH).

Angela – I'm sorry I forgot to mention that one. It was charged last year and D was sentenced this year.

From: Felte, James (CRT)<[redacted]>
Sent: Tuesday, May 28, 2024 11:56 AM
To: Miller, Angela (CRT) <[redacted]>; Patel, Sanjay (CRT)<[redacted]>
Subject: RE: question, AG hearing prep

A question re FACE: In addition to the four *Freestone et al.* defendants, didn't a USAO (in Ohio) also charge a defendant with a non-FACE statute (arson?) for an attack on a pregnancy resource center?

From: Miller, Angela (CRT) <[redacted]>
Sent: Tuesday, May 28, 2024 9:56 AM
To: Felte, James (CRT)<[redacted]>; Patel, Sanjay (CRT)<[redacted]>
Subject: RE: question, AG hearing prep

Hi, Jim –

Sanjay and I have discussed the FACE numbers. [redacted] our best attempt, given that some defendants have been charged multiple times and some defendants have been charged for targeting a reproductive health clinic but have NOT been charged with FACE. We've tried to break it down as best we can. The numbers in the first paragraph are exact (meaning, I counted 50 individual/distinct defendants – with some being charged more than once; in 25 cases). This assumes we know the universe of non-FACE Act cases (we may not). But using the "more than" phrasing for the total cases puts us at the same phrasing for exclusive FACE Act cases: more than 45 defendants in over 20 cases. SO...to provide some room for error, it MAY make sense to just include ALL cases together (FACE and non-FACE) and use the "more than" language. It would then look like Option 1. Breaking them out looks like Option 2. If you have a preference, I can put it in a word document if that would be helpful. (FYI, the four defendants targeting a pregnancy resource center were charged together in one case.)

- Angela

Option 1 (lumping FACE and non-FACE defendants/cases together:

Since January 2021, the Department has charged more than 45 defendants in over 20 cases for their actions related to interfering with those providing, or those seeking to obtain, reproductive health services; some of these defendants have been charged in multiple cases. This includes charges brought exclusively under the FACE Act, as well as other criminal charges specific to the alleged criminal conduct (*e.g.*, damaging or destroying, by means of fire or an explosive, a building used in interstate commerce). Among these defendants, four were charged for their actions targeting a pregnancy resource center.

Option 2 (breaking out FACE and non-FACE defendants/cases):

Since January 2021, the Department has charged 50 defendants in 25 cases for their actions related to interfering with those providing, or those seeking to obtain, reproductive health services; some of these defendants have been charged in multiple cases. This includes charges brought exclusively under the FACE Act, as well as other criminal charges specific to the alleged criminal conduct (*e.g.*, damaging or destroying, by means of fire or an explosive, a building used in interstate commerce). Among these defendants, four were charged for their actions targeting a pregnancy resource center.

When limited to just those charges brought under the FACE Act, the Department has charged more than 45 defendants in over 20 cases for their actions related to interfering with those providing, or those seeking to obtain, reproductive health services; some of these defendants have been charged in multiple cases. Among these defendants, four were charged for their actions targeting a pregnancy resource center.

In any event, here are the defendants / cases we identified:

FACE Act cases:

US v. James Gulick

US v. Everett Little

US v. Carlos Brume

US v. Daniel Courney

US v. Devin Kruse

US v. Richard Chamberlin

US v. Lauren Handy, et al. (Lauren Handy, Jonathan Darnel, [redacted], Paula Harlow, Jean Marshall, John Hinshaw, Heather Idoni, William Goodman, Joan Bell, Herb Geraghty)

US v. Mark Houck

US v. Christopher Moscinski

US v. Chester Gallagher, et al. (Chester Gallagher, Heather Idoni, Calvin Zastrow, Coleman Boyd, [redacted], Paul Vaughn, Dennis Green, Eva Edl, Eva Zastrow, James Zastrow, Paul Place)

US v. Michael Barron

US v. Bevelyn Williams, et al. (Bevelyn Williams, Edmee Cavannes)

US v. Caleb Freestone, et al. (Caleb Freestone, Amber Marie Smith-Stewart, Annarella Rivera, Gabriella Oropesa)

US v. Calvin Zastrow, et al. (Calvin Zastrow, Chester Gallagher, Heather Idoni, [redacted], Joel Curry, Justin Phillips, Eva Edl, Eva Zastrow)

US v. Steven Lefemine

US v. Nisith Vandebona

US v. Chance Brannon, et al. ([redacted])

US v. Ernez Tomas Austin

US v. Whitney Durant

US v. Mohamed Waes

US v. Joshua Brereton

Non-FACE Act cases:

US v. Tyler Massengill

US v. Lorna Green

US v. Hrindindu Raychowdhury

US v. Phillip Buyno

From: Felte, James (CRT)[redacted]
Sent: Friday, May 24, 2024 5:39 PM
To: Miller, Angela (CRT) [redacted]; Patel, Sanjay (CRT)[redacted]
Subject: FW: question, AG hearing prep

Angela & Sanjay- See below regarding a stat request from the AG's office for the AG's upcoming congressional testimony. Please do not work over the weekend, but do you think you can get these stats to me by Wednesday morning?

Angela- for the HOW request, we can talk on Tuesday about the parameters. 247 cases are fairly easy to identify, but 875 and other statutes that don't require certification may be difficult to identify.

Thanks,

Jim

From: Felte, James (CRT)
Sent: Friday, May 24, 2024 5:31 PM
To: Sooknanan, Sparkle (CRT) [redacted]
Cc: Moossy, Robert (CRT) [redacted]
Subject: RE: question, AG hearing prep

Sparkle,

We don't currently have these numbers. We should be able to get the FACE Act numbers fairly easily on Tuesday. Regarding the second request for HOWs, while we keep a running total of our general hate crimes stats (x # cases, against y # defendants, and z # defendants convicted since January 2021), we don't have them broken out by specific categories such as HOWs. That means we'll need to do a hand count for that specific category which will take some time. I'll see we can get those on Tuesday.

Jim

From: Sooknanan, Sparkle (CRT) <[redacted]>
Sent: Friday, May 24, 2024 5:23 PM
To: Felte, James (CRT) <[redacted]>
Cc: Moossy, Robert (CRT) <[redacted]>
Subject: FW: question, AG hearing prep

Jim—Do we already have these numbers? If not, I'll ask Shaylyn for more time so it doesn't require work over the weekend. Thank you!

From: Cochran, Shaylyn (OAG) <[redacted]>
Sent: Friday, May 24, 2024 4:41 PM
To: Moossy, Robert (CRT) <[redacted]>; Sooknanan, Sparkle (CRT) <[redacted]>
Cc: Trepel, Samantha (OASG) <[redacted]>; Bruck, Andrew (ODAG) <[redacted]>
Subject: question, AG hearing prep

Hi Robert and Sparkle,

With huge apologies for sending this request before the long weekend, am looking to pin down the following information:

- The total number of FACE Act prosecutions brought since January 2021 (and, if possible, the breakdown re: cases involving pregnancy resource centers and facilities offering comprehensive reproductive health services).

- The total number of prosecutions involving attacks on or unlawful threats against houses of worship since January 2021. For this one, I recommend focusing on cases brought under 18 U.S.C. § 247 or threats cases under 18 U.S.C. § 875 involving houses of worship, but I defer to CRT on whether there are prosecutions under other statutes (that CRT enforces) that are likely to fall under this description.

We need this information compiled by no later than Tuesday at noon. However, if meeting that deadline would require folks to work on this over the holiday weekend, then please let me know asap so we can huddle.

Shaylyn

EXHIBIT 112

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Klopf, Amanda (USATNM)" <[redacted]>, "Ramnaney, Nikhil (CRT)" <[redacted]>
Subject: RE: Gallagher
Date: Thu, 02 Feb 2023 17:34:33 -0500
Importance: Normal
Attachments: OCaMTD.pdf
Inline-Images: image001.png

Thanks for leading the discussion with Henry.

Nikhil and I spoke with Forrest about Jody's request, and we agreed that we should not provide her with anything.

To make a claim of selective pros, she bears a significant burden to show both discriminatory effect and purpose.
She will have to, at a minimum, point to a similarly situated pro-choice individual who was not prosecuted for a 248(a)(1) violation.
Our pros stats won't help her achieve that goal.
She'll need more than raw data to make her case.
Moreover, she may use our compliance as a discovery vehicle to dig into our investigation and pros decisions.
Providing her with the requested information may open gates we will struggle to close later.

I attached the Philly court's written opinion denying D's MTD for selective pros (among other grounds).
Our facts are different, but the legal issue is the same.

Happy to chat more about this.

From: Klopf, Amanda (USATNM) <[redacted]>
Sent: Thursday, February 2, 2023 5:12 PM
To: Patel, Sanjay (CRT)"<[redacted]>; Ramnaney, Nikhil (CRT) <[redacted]>
Subject: Gallagher

Thank you both (and Forest) for joining that call. I spoke to Tom (our FAUSA) afterwards about Jody's records request, and his inclination is to just hand over the data. After you have a chance to talk it over with Forest, will you let me know your feelings on it?

Thank you
Amanda

Amanda J. Klopf
Assistant United States Attorney
Civil Rights Coordinator
Computer Hacking and Intellectual Property Attorney
Middle District of Tennessee
U.S. Attorney's Office | [redacted]
T: [redacted]
eMail: [redacted]

EXHIBIT 113

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Bernstein, Bobbi (CRT)" <[redacted]>
Cc: "Fitzgerald, Paige (CRT)" <[redacted]>
Subject: FW: Blockade Update
Date: Fri, 28 Aug 2020 10:35:26 -0400
Importance: Normal
Inline-Images: image002.png; image001.jpg

Hi, Bobbi.
Below are links to a bunch of videos that were posted on-line (some live-streamed on facebook) from a clinic blockade that occurred yesterday in Sterling Heights, MI.
According to Michelle Davidson (NAF), the blockade lasted nearly an hour, and several women seeking medical services were not able to enter the building and obtain services.
Some of these videos appear to document this.
I'm expecting clinic staff incident reports to be fwd'd to me when they're ready.
The clinic has been in touch with FBI (SA[redacted]).
I have not reached out to Francis.
I'm happy to jump on this if you'd like.
Let me know.
Thanks.
SP

From: Tara Gannon <[redacted]@prochoice.org>
Sent: Friday, August 28, 2020 9:31 AM
To: Michelle Davidson <[redacted]@prochoice.org>; Fleisher, Aaron (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Cc: Emma Goldberg <[redacted]@prochoice.org>
Subject: RE: Blockade Update

Good Morning,

The following dropbox links are the videos from the incident yesterday.

https://www.dropbox.com[redacted]

https://www.dropbox.com[redacted]

https://www.dropbox.com[redacted]

https://www.dropbox.com[redacted]

https://www.dropbox.com[redacted]

https://www.dropbox.com[redacted]

https://www.dropbox.com[redacted]

https://www.dropbox.com[redacted]

https://www.dropbox.com[redacted]

https://www.dropbox.com[redacted]

Thank you,

Tara Gannon
Senior Director, Security
National Abortion Federation

(T) [redacted]
(E) [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Thursday, August 27, 2020 6:20 PM
To: Aaron fleisher <[redacted]>; [redacted]; [redacted]
Cc: Tara Gannon [redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Blockade Update

Good Evening All,

We are still working on the downloads (they are taking forever) so as soon as we have them in a dropbox, Tara will forward them on. We will also be sending you incident reports and video footage from the clinic- hopefully tomorrow. Looks like we are about to be reliving the pre FACE late 80's/early 90's. The clinic is grateful for the support and as always, so are we.

Thank you all for all you do.

-Michelle

Michelle Davidson
Director, Security

All pronouns are respectfully accepted
(They/Them, He/Him, She/Hers)

National Abortion Federation
[redacted]
O/C: [redacted]

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail in error, please immediately notify the sender by e-mail at the address shown. Please delete it from your files if you are not the intended recipient. Thank you for your compliance.

EXHIBIT 114

From: "Patel, Sanjayt(CRT)" <[redacted]>
To: "Carlson, Frances (USAMIE)" <[redacted]>
Subject: FW: Sterling Heights, MI FACE violations and more, 08.27.2020
Date: Tue, 01 Sep 2020 11:06:48 -0400
Importance: Normal

Frances,
The below email was fwd to me by the NAF security director.
It's from [redacted] and related to the incident from last week (the one with video links I sent you).
I think we have a good misdemeanor 248(a)(1) for each protestor who blocked the entrances.
I know that you've got a busy week, but can we set up a call with the FBI?
Or, I can reach out to [redacted] and get things moving with collecting arrest reports for protestors, and statements from clinic staff/patients that have already been written up (per [redacted]).
Then we can regroup once we have time to digest these materials?
Let me know what works best for you.
Thanks.
SP

From: Michelle Davidson [redacted]@prochoice.org>
Sent: Monday, August 31, 2020 5:56 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon" <[redacted]@prochoice.org>; Emma Goldberg <[redacted]>
Subject: Sterling Heights, MI FACE violations and more, 08.27.2020

From: [redacted] <[redacted]>
Sent: Monday, August 31, 2020 5:47 PM
To: [redacted] (DE) (FBI) <[redacted]>; [redacted]
Cc: Michelle Davidson <[redacted]@prochoice.org>; [redacted] George Washington <[redacted]>; duVergne Gaines <[redacted]@feminist.org>; [redacted]
Subject: Sterling Heights, MI FACE violations and more, 08.27.2020

Dear Agents [redacted],

We are copying on this email our attorneys, as well as Michelle Davidson from the National Abortion Federation and duVergne Gaines from the Feminist Majority Foundation, both of who we believe you work with on these FACE issues.

We are following up to give you a better description of the events that transpired at our [redacted] Clinic in Sterling Heights last week. The events that happened on Thursday were distressing, illegal and we are not happy with the way it was handled. I am going to summarize below (1) what happened generally (2) how we were treated by the SH Police - the disrespect, and how they did NOT do their job to protect us or the patients and (3) the probable FACE violations and how to move forward with prosecution.

(1) The following events happened at [redacted] Sterling Heights, MI [redacted]. As staff began to arrive at the clinic for work around 8:30am, there were already a large number of protesters present.

As more staff members and patients began to arrive for opening at 9am, approximately 10-15 of the protesters trespassed into the parking lot. There are multiple signs visibly posted all over the property stating "No Trespassing- patients and guests only" and it lists the Sterling Heights ordinance number for trespassing. They approached patient's cars and immediately began trying to open patient's car doors in the parking lot, block clinic entrances and harass anyone present in the parking lot. This was approximately at 8:50am. Many staff members were already inside the building but some were not and patients were arriving for 9am appts. The police were called as soon as this was discovered.

The police arrived shortly after 9 am (we are checking the exact times). Our security guard gave the trespassers a verbal warning to leave the premises and the police did not arrest anyone for trespassing. There were a number of protesters filming/live-streaming from the sidelines of our property (also trespassing but not blocking entrances). The doors to enter/exit the building were blocked for approximately 1.5 hours.

Prior to her arrival at the clinic, the owner called 2 more security guards to come to the clinic to help with the situation. When the owner arrived on the scene around 9:30am, the police asked the owner to AGAIN verbally tell those blocking the main clinic entrances to leave. The owner refused to and asked the police if they knew the trespassers names and information because they were breaking a federal law and if they get up and leave after blockading clinic entrances, they wouldn't be able to charge them with violating the FACE federal law. At that time, the owner called FBI Agent [redacted] and asked for help because the police were uncooperative and this was clearly a FACE violation. Agent [redacted] advised the owner that the Sterling Heights FBI office would contact the Sterling Heights police department to explain FACE. Police stated to the owner that they had to wait for more police and cars to arrive before they could begin arresting. At this time there were a few officers on the scene and at least 3 police cars.

At some point between 9:30-10am, the clinic owner tried to take a staff member and a patient around the building to another entrance facing [redacted]. Some of the trespassers blocking the main doors facing the parking lot left and ran around the building in order to block them from entering at 2 different doors on that side of the building. Some of those same trespassers that were blocking the doors were the same protesters that were going up to cars and harassing patients trying to open car doors. The police could have arrested them at any time they were walking around and they had enough cars to put at least one person in a car each and allowed them to return to the main doors and continue to block it. The police were rude and dismissive to the owner and staff. The police advised the owner and staff that the trespassers had a right to be there. The owner explained that they had a right to protest on the public sidewalk in front of the building and they did not have a right to trespass into the parking lot, which is against the city ordinance and they did not have a right to block our entrances and keep our business from operating as that is breaking a federal law. A female Sargent arrived close to 10am. The owner had the same discussion with her and officers began asking the people blocking the door for their identification. The owner gave a verbal request to leave the premises and was answered by one person blocking the door that she could not comply. A paddywagon type vehicle arrived and they started arresting around 10am. They took their time doing that and kept our business from opening for medical care for over 1.5 hours. These protesters expressed their surprise on their live-streaming videos about how long they could engage the police officers in chit chat conversation to enable their fellow people to leave the door to harass the patients in the parking lot- or so-call "minister" to them. The arrests were slow and our parking lot continued to be blocked with police cars and protesters preventing patients with later appointments from entering our parking lot and being subjected to the harassment on the street.

2. When the police arrived on the scene they NEVER once asked or checked on the safety of the staff inside. They didn't show any concern for their well-being. They also did not try to talk to any staff in the parking lot or check on the well-being of the patients being harassed and terrorized in the parking lot. They did not try to enter the building or try to speak to any of the staff inside. They did not check to see if anyone was injured on the inside or, in fact, if any of the trespassers had succeeded in

entering the building. The staff could have been in danger, held at gunpoint, etc. and the police would not have known as they did not even inquire about their welfare. After the police were there for some time, one supervisor tried to beckon a police officer inside by slightly opening the door and asking him to speak to her in the vestibule and he was rude and dismissive.

The officers who arrived first on the scene immediately began engaging with the trespassers in conversation about random things while they were blocking the clinic entrances. They did not check for weapons nor did they take the personal property of the trespassers after they were arrested. In fact, one male who blockaded the clinic entrance actually had his phone recording for 1 hr 26 min. This recording included his time blocking the clinic entrance, conversations with law enforcement, the audio for his whole ride to the jail and his conversation with Officer "[redacted]" as well as recording from within the jail until the owner of the clinic called the police to advise them they were recording live from within the jail. The police allowed the private property of our clinic to be a circus of harassment and terror for approximately 1.5 hours. They not only sympathized with those breaking the law but allowed them to continue breaking the law for as long as they could. They ignored the rights of the business owner, the staff and the patients waiting to be seen for medical care. There are public groups calling for the firing of these officers involved due to their actions in this situation. We are looking into filing formal complaints about the actions of the officers involved with the Department. During this whole ordeal, there were about 40 other protesters out on the sidewalks adding to the mayhem.

3. We are disappointed in the communications we had with the FBI as this was happening. Our communications were with Agent [redacted]. I left Agent [redacted] a voicemail at 10:52am that day to ask about witness statements for a FACE case and what needed to be collected. I did not receive a phone call back until the following day, which was not helpful as all witnesses were obviously no longer present. She stated the next day that she would have advised me to call NAF about that. As far as I am aware, the Dept of Justice who is the "boss" of the FBI would be the prosecutor of any federal cases. Not NAF. So why wouldn't the FBI be the ones to advise us on what information would be important to obtain in a federal FACE case? We didn't hear from any FBI agents for the rest of the day. In fact, we have still not heard from any agents regarding what happened.

We understand that [redacted] in Detroit was dealing with a suspicious package situation and 2 agents attended to that situation. We are glad for that and are also wondering why when we were experiencing a severe FACE violation, not one FBI agent checked in with us for not only the rest of the day, but for the rest of the week. Agent [redacted] advised me on our call Friday that what we were experiencing at [redacted] clinic didn't rise to the level of requiring FBI involvement at that time. We are very glad the FBI was at [redacted] for the suspicious package incident but still do not understand why our experience did not reach the same level of FBI support. We were told that [redacted] from [redacted] spoke with Agent [redacted] on Friday and told him about our experience, the recording of the protesters, how long they were in our parking lot and how long our business was shut down and according to her, he wasn't aware of the situation and that it sounded like a clear FACE violation. If that is correct, why did we not hear from someone at the FBI?

These same terrorists that were arrested in Sterling Heights on Thursday also went to our [redacted] location on Friday. They did not attempt to blockade the clinic but were present and intimidating and could have tried to do the same thing.

There were a total of 10 arrested on Thursday in Sterling Heights. We have identified them all. We have identified the 3 police officers that we believe did not do their job and whose actions were most egregious. We have collected witness statements from those willing to give them (patients and their support persons) as well as statements from all the staff members. We have gathered video footage and photos of the FACE violations and from the whole incident from all Facebook videos, security footage, and staff phones. We want to move forward with a FACE prosecution and are sending all this information over to the Department of Justice.

I am adding a link here of a video that was taken by 1 person arrested, Chet Gallagher, who is in some sort of leadership position with Operation Save America. This video is the most egregious in showing the behavior of the police officers involved, including conversations between the FACE violators and the police, the interactions between them, the conversation with Officer "[redacted]" and Chet on the way to jail (that included opinions about Black Lives Matter, people burning cities and other personal viewpoints. and the recording from inside the jail. I have this video downloaded, as well as many others that were captured from anti-abortion terrorists that were recording, our staff members that recorded and show explicit blockading of all clinic entrances (both patient and employee).
https://www.youtube.com[redacted]

We are going to be sending a separate email to you regarding a separate incident, concern and location as to not confuse the two. It is regarding an occurrence at our [redacted]city location on Saturday, August 29, 2020 with protesters with assault weapons and the police situation there.

Thank you,

[redacted] and [redacted] (owner of [redacted])

--

[redacted], JD (she/her/hers)
Director of Advocacy & Development
[redacted] Centers, Michigan
Email: [redacted]
Mobile: [redacted]

[redacted]

Did you know you can support our non-profit Reclaim with every Amazon purchase? SHOP NOW

CONFIDENTIALITY NOTICE: This email transmission from [redacted] Centers and any documents, files or previous email messages attached to it may contain confidential information that is privileged. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is strictly prohibited. If you have received this email in error, please immediately notify the sender and delete the message and its attachments.

EXHIBIT 115

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Michelle Davidson" <[redacted]@prochoice.org>
Cc: "Tara Gannon" <[redacted]@prochoice.org>, "Emma Goldberg" <[redacted]@prochoice.org>
Subject: RE: Sterling Heights, MI FACE violations and more, 08.27.2020
Date: Tue, 01 Sep 2020 11:12:19 -0400
Importance: Normal

Hey, Michelle.
I've reached out to the USAO in Detroit.
In the meanwhile, can you help coordinate getting these for me?

We have collected witness statements from those willing to give them (patients and their support persons) as well as statements from all the staff members. We have gathered video footage and photos of the FACE violations and from the whole incident from all Facebook videos, security footage, and staff phones. We want to move forward with a FACE prosecution and are sending all this information over to the Department of Justice.

Thank you!
SP

From: Michelle Davidson [redacted]@prochoice.org>
Sent: Monday, August 31, 2020 5:56 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Sterling Heights, MI FACE violations and more, 08.27.2020

From: [redacted] <[redacted]>
Sent: Monday, August 31, 2020 5:47 PM
To: [redacted] (DE) (FBI)<[redacted]>; [redacted]
Cc: Michelle Davidson <[redacted]@prochoice.org>; [redacted]
<[redacted]>; duVergne Gaines <[redacted]@feminist.org>; [redacted]
<[redacted]>
Subject: Sterling Heights, MI FACE violations and more, 08.27.2020

Dear Agents [redacted], [redacted] and [redacted]

We are copying on this email our attorneys, as well as Michelle Davidson from the National Abortion Federation and duVergne Gaines from the Feminist Majority Foundation, both of who we believe you work with on these FACE issues.

We are following up to give you a better description of the events that transpired at our [redacted] Clinic in Sterling Heights last week. The events that happened on Thursday were distressing, illegal and we are not happy with the way it was handled. I am going to summarize below (1) what happened generally (2) how we were treated by the SH Police - the disrespect, and how they did NOT do their job to protect us or the patients and (3) the probable FACE violations and how to move forward with prosecution.

(1) The following events happened at [redacted] Sterling Heights, MI [redacted]. As staff began to arrive at the clinic for work around 8:30am, there were already a large number of protesters present. As more staff members and patients began to arrive for opening at 9am, approximately 10-1i5 of the protesters trespassed into the parking lot. There are multiple signs visibly posted all over the property stating "No Trespassing- patients and guests only" and it lists the Sterling Heights ordinance number for trespassing. They approached patient's cars and immediately began trying to open patient's car doors in the parking lot, block clinic entrances and harass anyone present in the parking lot. This was approximately at 8:50am. Many staff members were already inside the building but some were not and patients were arriving for 9am appts. The police were called as soon as this was discovered.

The police arrived shortly after 9 am (we are checking the exact times). Our security guard gave the trespassers a verbal warning to leave the premises and the police did not arrest anyone for trespassing. There were a number of protesters filming/live-streaming from the sidelines of our property (also trespassing but not blocking entrances). The doors to enter/exit the building were blocked for approximately 1.5 hours.

Prior to her arrival at the clinic, the owner called 2 more security guards to come to the clinic to help with the situation. When the owner arrived on the scene around 9:30am, the police asked the owner to AGAIN verbally tell those blocking the main clinic entrances to leave. The owner refused to and asked the police if they knew the trespassers names and information because they were breaking a federal law and if they get up and leave after blockading clinic entrances, they wouldn't be able to charge them with violating the FACE federal law. At that time, the owner called FBI Agenti[redacted] and asked for help because the police were uncooperative and this was clearly a FACE violation. Agent [redacted] advised the owner that the Sterling Heights FBI office would contact the Sterling Heights police department to explain FACE. Police stated to the owner that they had to wait for more police and cars to arrive before they could begin arresting. At this time there were a few officers on the scene and at least 3 police cars.

At some point between 9:30-10am, the clinic owner tried to take a staff member and a patient around the building to another entrance facing[redacted]. Some of the trespassers blocking the main doors facing the parking lot left and ran around the building in order to block them from entering at 2 different doors on that side of the building. Some of those same trespassers that were blocking the doors were the same protesters that were going up to cars and harassing patients trying to open car doors. The police could have arrested them at any time they were walking around and they had enough cars to put at least one person in a car each and allowed them to return to the main doors and continue to block it. The police were rude and dismissive to the owner and staff. The police advised the owner and staff that the trespassers had a right to be there. The owner explained that they had a right to protest on the public sidewalk in front of the building and they did not have a right to trespass into the parking lot, which is against the city ordinance and they did not have a right to block our entrances and keep our business from operating as that is breaking a federal law. A female Sargent arrived close to 10am. The owner had the same discussion with her and officers began asking the people blocking the door for their identification. The owner gave a verbal request to leave the premises and was answered by one person blocking the door that she could not comply. A paddywagon type vehicle arrived and they started arresting around 10am. They took their time doing that and kept our business from opening for medical care for over 1.5 hours. These protesters expressed their surprise on their live-streaming videos about how long they could engage the police officers in chit chat conversation to enable their fellow people to leave the door to harass the patients in the parking lot- or so-call "minister" to them. The arrests were slow and our parking lot continued to be blocked with police cars and protesters preventing patients with later appointments from entering our parking lot and being subjected to the harassment on the street.

2. When the police arrived on the scene they NEVER once asked or checked on the safety of the staff inside. They didn't show any concern for their well-being. They also did not try to talk to any staff in the parking lot or check on the well-being of the patients being harassed and terrorized in the parking

lot. They did not try to enter the building or try to speak to any of the staff inside. They did not check to see if anyone was injured on the inside or, in fact, if any of the trespassers had succeeded in entering the building. The staff could have been in danger, held at gunpoint, etc. and the police would not have known as they did not even inquire about their welfare. After the police were there for some time, one supervisor tried to beckon a police officer inside by slightly opening the door and asking him to speak to her in the vestibule and he was rude and dismissive.

The officers who arrived first on the scene immediately began engaging with the trespassers in conversation about random things while they were blocking the clinic entrances. They did not check for weapons nor did they take the personal property of the trespassers after they were arrested. In fact, one male who blockaded the clinic entrance actually had his phone recording for 1 hr 26 min. This recording included his time blocking the clinic entrance, conversations with law enforcement, the audio for his whole ride to the jail and his conversation with Officer "[redacted]" as well as recording from within the jail until the owner of the clinic called the police to advise them they were recording live from within the jail. The police allowed the private property of our clinic to be a circus of harassment and terror for approximately 1.5 hours. They not only sympathized with those breaking the law but allowed them to continue breaking the law for as long as they could. They ignored the rights of the business owner, the staff and the patients waiting to be seen for medical care. There are public groups calling for the firing of these officers involved due to their actions in this situation. We are looking into filing formal complaints about the actions of the officers involved with the Department. During this whole ordeal, there were about 40 other protesters out on the sidewalks adding to the mayhem.

3. We are disappointed in the communications we had with the FBI as this was happening. Our communications were with Agenti[redacted] [redacted] I left Agenti[redacted] a voicemail at 10:52am that day to ask about witness statements for a FACE case and what needed to be collected. I did not receive a phone call back until the following day, which was not helpful as all witnesses were obviously no longer present. She stated the next day that she would have advised me to call NAF about that. As far as I am aware, the Dept of Justice who is the "boss" of the FBI would be the prosecutor of any federal cases. Not NAF. So why wouldn't the FBI be the ones to advise us on what information would be important to obtain in a federal FACE case? We didn't hear from any FBI agents for the rest of the day. In fact, we have still not heard from any agents regarding what happened.

We understand that [redacted] Clinic in Detroit was dealing with a suspicious package situation and 2 agents attended to that situation. We are glad for that and are also wondering why when we were experiencing a severe FACE violation, not one FBI agent checked in with us for not only the rest of the day, but for the rest of the week. Agent [redacted] advised me on our call Friday that what we were experiencing at NFP clinic didn't rise to the level of requiring FBI involvement at that time. We are very glad the FBI was at [redacted] for the suspicious package incident but still do not understand why our experience did not reach the same level of FBI support. We were told thati[redacted]from [redacted] spoke with Agent[redacted] on Friday and told him about our experience, the recording of the protesters, how long they were in our parking lot and how long our business was shut down and according to her, he wasn't aware of the situation and that it sounded like a clear FACE violation. If that is correct, why did we not hear from someone at the FBI?

These same terrorists that were arrested in Sterling Heights on Thursday also went to our [redacted] location on Friday. They did not attempt to blockade the clinic but were present and intimidating and could have tried to do the same thing.

There were a total of 10 arrested on Thursday in Sterling Heights. We have identified them all. We have identified the 3 police officers that we believe did not do their job and whose actions were most egregious. We have collected witness statements from those willing to give them (patients and their support persons) as well as statements from all the staff members. We have gathered video footage and photos of the FACE violations and from the whole incident from all Facebook videos, security

footage, and staff phones. We want to move forward with a FACE prosecution and are sending all this information over to the Department of Justice.

I am adding a link here of a video that was taken by 1 person arrested, Chet Gallagher, who is in some sort of leadership position with Operation Save America. This video is the most egregious in showing the behavior of the police officers involved, including conversations between the FACE violators and the police, the interactions between them, the conversation with Officer '[redacted]' and Chet on the way to jail (that included opinions about Black Lives Matter, people burning cities and other personal viewpoints. and the recording from inside the jail. I have this video downloaded, as well as many others that were captured from anti-abortion terrorists that were recording, our staff members that recorded and show explicit blockading of all clinic entrances (both patient and employee).
https://www.youtube.com/[redacted]

We are going to be sending a separate email to you regarding a separate incident, concern and location as to not confuse the two. It is regarding an occurrence at our [redacted] city location on Saturday, August 29, 2020 with protesters with assault weapons and the police situation there.

Thank you,

[redacted] and [redacted] (owner of [redacted])

--

[redacted], JD (she/her/hers)
Director of Advocacy & Development
[redacted] Centers, Michigan
Email: [redacted]
Mobile: [redacted]

[redacted]

Did you know you can support our non-profit Reclaim with every Amazon purchase? SHOP NOW

CONFIDENTIALITY NOTICE: This email transmission from [redacted] Centers and any documents, files or previous email messages attached to it may contain confidential information that is privileged. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is strictly prohibited. If you have received this email in error, please immediately notify the sender and delete the message and its attachments.

EXHIBIT 116

From: "Fleisher, Aaron (CRT)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Subject: FW: Blockade-[redacted] Police Report
Date: Mon, 14 Sep 2020 13:54:55 -0400
Importance: Normal
Attachments: police_report.pdf

Sanjay:

I'm assuming you all are still looking into this. When you decide if you're moving forward, will you let me know?

Thanks,
Aaron

Aaron Fleisher
Trial Attorney
Special Litigation Section, Civil Rights Division
U.S. Department of Justice
Phone: [redacted]
Pronouns: he/him/his

From: Michelle Davidson <[redacted]@prochoice.org>
Sent: Monday, September 14, 2020 1:37 PM
To: Fleisher, Aaron (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Cc: Tara Gannon <[redacted]@prochoice.org>; Emma Goldberg <[redacted]@prochoice.org>
Subject: Blockade-[redacted] Police Report

Hello All,

Attached is the very redacted police report that was provided to the clinic. Both the case number and ORI number are provided so hopefully that will give you access to the original document. Please let us know if we can assist with anything else.

Have a good week,

Michelle

From: [redacted] <[redacted]>
Sent: Monday, September 14, 2020 12:52 PM
To: Michelle Davidson <[redacted]@prochoice.org>
Cc: [redacted] <[redacted]>; [redacted] <[redacted]>
Subject: police report

HI Michelle
Here is the police report from [redacted] in Sterling Heights from 8/27/20.

--
[redacted]
she/her/hers

[redacted] Manager

CONFIDENTIALITY NOTICE: This email transmission from [redacted] Centers and any documents, files or previous email messages attached to it may contain confidential information that is privileged. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is strictly prohibited. If you have received this email in error, please immediately notify the sender and delete the message and its attachments.

EXHIBIT 117

From: Gardey, David (USAMIE)
To: Carlson, Frances (USAMIE)
Subject: RE: FACE Act prosecutions
Date: Tuesday, January 4, 2022 2:16:29 PM

Are there any instances of violence by any of the possible targets at any of the other locations like Tennessee or Kentucky? It seems if they used violence at other locations during the course of their protests that it may support doing a prosecution even if the protests in our district were non-violent.

From: Carlson, Frances (USAMIE) <[redacted]> ay **Sent:** Tuesday, January 4, 2022 11:47 AM
To: Gardey, David (USAMIE) <[redacted]>
Subject: RE: FACE Act prosecutions

Circling back again. Sanjay/Bobbi have gone ahead to get agents assigned to each incident. (The amount of work to be done is minimal.) We also just had a call with the prosecutor who is handling the 2020 trespass case in Sterling Heights. His case is pending an interlocutory appeal by the prosecution regarding a defense jury instruction that the district court judge granted. However the appeal turns out, they will proceed with the trespass trial but it is a 30 day misdemeanor. He expects they would get 1 year non-reporting probation. If there was a federal prosecution (which he was excited about), he would not proceed with his case.

Sanjay and Bobbi would like to know if our office will do the prosecution with them. I think we should. Either way, the Civil Rights Div will proceed with the prosecution.

Let me know if you would like to discuss, or whether we should discuss this with Mark again?

Frances

From: Carlson, Frances (USAMIE)
Sent: Wednesday, December 15, 2021 12:25 PM
To: Gardey, David (USAMIE) <[redacted]>
Subject: RE: FACE Act prosecutions

Re: your question #2, Sanjay is not aware of any FACE Act prosecutions involving non-violent violations *yet*. But, the posture of the administration and his particular office has changed so expects that there will be. His office definitely plans on moving forward with this and would prefer to do it with us.

In addition to the information I provided you before re: the repeated behavior of some of the individuals, here are some additional reasons why the Civil Rights Division wants to pursue this:

- The clinic in Sterling Heights has been targeted by the organization to which the repeat offenders belong, but not necessarily targeted on a repeated basis by these particular individuals.
- Given that the repeat offenders travel from clinic to clinic and state to state, a civil enforcement action in EDMI likely will have little effect since any injunction would only prohibit them from engaging in this activity within EDMI.

At this point, they would like to know where we stand. I believe they are in the process of getting agents assigned to each incident. Sanjay said he is sure that Bobbi would be happy to discuss this with you if you think it would be helpful.

From: Carlson, Frances (USAMIE)
Sent: Monday, December 13, 2021 11:44 AM
To: Gardey, David (USAMIE) <[redacted]>
Subject: RE: FACE Act prosecutions

I'll find out re: question #1.
As to question #2, I am pretty sure "recent events" refers to the Texas law restricting abortion. I believe that was enacted on 9/1/2021.

From: Gardey, David (USAMIE) <[redacted]>
Sent: Monday, December 13, 2021 11:18 AM
To: Carlson, Frances (USAMIE) <[redacted]>
Subject: RE: FACE Act prosecutions

Is Civil Rights aware of any non-violent FACE Act prosecutions that have been done around the country by USAOs, either in response to the DAAG memo or otherwise?

Also, do you know what the DAAG memo is referring to when it twice references "recent events"?

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Monday, December 13, 2021 10:12 AM
To: Gardey, David (USAMIE) <[redacted]>
Subject: RE: FACE Act prosecutions

I have video from three BWCs from Saginaw PD that shows those two women.

Our Pros Guidelines don't directly address repeat non-violent offenders that block entrances as multiple clinics vs. a sustained campaign over an extended period of time. I think prosecution should be considered for individuals who clinic hop and repeat their illegal activity

over and over again.

From: Gardey, David (USAMIE) <[redacted]>
Sent: Monday, December 13, 2021 9:49 AM
To: Carlson, Frances (USAMIE) <[redacted]>
Subject: RE: FACE Act prosecutions

Here are some photos of the Saginaw incident.

https://www.lifesitenews.com/news/soviet-concentration-camp-survivor-pro-lifer-arrested-for-blocking-entrance-to-abortion-center/

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Monday, December 13, 2021 9:41 AM
To: Gardey, David (USAMIE) <[redacted]>
Subject: RE: FACE Act prosecutions

I'm in the office today if you want to chat about this.

From: Gardey, David (USAMIE) <[redacted]>
Sent: Thursday, December 9, 2021 10:40 AM
To: Carlson, Frances (USAMIE) <[redacted]>
Subject: RE: FACE Act prosecutions

Hey---as we delve into this issue, attached are the most recent pros guidelines for PCU, which include the updated FACE guidelines on the last page.

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Thursday, December 9, 2021 9:41 AM
To: Gardey, David (USAMIE) <[redacted]>
Subject: FACE Act prosecutions

Hi Dave-

Sanjay Patel from the Civil Rights Division reached out to me a few weeks ago about that case from Sterling Heights where the individuals blocked the clinic entrance. His management is very eager to pursue the prosecution now given some events that have occurred since then. If you recall, the Sterling Heights blocked happened in August 2020 and resulted in 10 individuals receiving trespassing tickets. I'm in the midst of finding out what happened with those cases but from what I can see, I'm not sure anything did. 2 out of 10 of the individuals had previously been arrested in May 2017 in Kentucky for a blockade (Eva Zastrow and Eva

Edl). This resulted in a civil enforcement action by the DOJ.

In March 2021, 6 of the 10 individuals that were involved in the Sterling Heights incident were arrested in Tennessee (including the Eva Zastro and Eva Edl who were also involved in Kentucky).

In April 2021, Eva Edl and Heather Idoni (who was also involved in Tennessee and Sterling Heights) were arrested in Saginaw for blocking the entrance to a clinic.

The Civil Rights Division is interested in pursuing the Sterling Heights and Saginaw incidents for prosecution. The videos are very clear as to what the individuals were doing. As a reminder, once an individual has a misdemeanor FACE Act conviction, a second offense would be a felony. Given the recent directive from the DAG of the Civil Rights Division (see attached), I agree with opening these. I know you had strong opinions back when the Sterling Heights incident happened since there was no violence or damage to the clinic so wanted to run it by you.

Thanks-
Frances

Frances Lee Carlson
Assistant U.S. Attorney
Deputy Chief, Public Corruption Unit
Criminal Civil Rights Coordinator
Eastern District of Michigan
[redacted] | [redacted]

EXHIBIT 118

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Bernstein, Bobbi (CRT)" <[redacted]>
Subject: RE: Order dismissing
Date: Fri, 06 May 2022 12:35:02 -0400
Importance: Normal

Confirmed that USAO wants to indict, so we should have a combined gj memo to you soon, with charging memos to follow.

From: Bernstein, Bobbi (CRT) <[redacted]>
Sent: Friday, May 6, 2022 12:34 PM
To: Patel, Sanjay (CRT)"<[redacted]>
Subject: RE: Order dismissing

Thanks.

On a separate note, what's the status of the FACE cases? those memos looked pretty ready-to-go when I read them.

From: Patel, Sanjay (CRT)"<[redacted]>
Sent: Friday, May 6, 2022 12:29 PM
To: Bernstein, Bobbi (CRT) <[redacted]>
Subject: FW: Order dismissing

Hi, Bobbi –
Attached is the dismissal order for [redacted]
Thanks,
SP

From: Whelan, Traci (USAID)"<[redacted]>
Sent: Friday, May 6, 2022 10:58 AM
To: Patel, Sanjay (CRT)"<[redacted]>
Subject: Order dismissing

Sanjay,
Here is the order dismissing the case.
Take care,
tjw

Traci J. Whelan
AUSA/Branch Manager
District of Idaho
Coeur d'Alene Office
[redacted]

EXHIBIT 119

From: "Bernstein, Bobbi (CRT)" <[redacted]>
To: "Fitzgerald, Paige (CRT)" <[redacted]>
Subject: FW: detroit FACE
Date: Thu, 19 May 2022 19:35:58 -0400
Importance: Normal

😊

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Thursday, May 19, 2022 6:15 PM
To: Bernstein, Bobbi (CRT) <[redacted]>; Bernstein, Laura-Kate (CRT)" <[redacted]>
Subject: RE: detroit FACE

I'm persuaded to add the 241.
I'll connect with LK about it, and we'll try to get you something asap.
We'll also connect with Frances to gether thoughts.

From: Bernstein, Bobbi (CRT)"<[redacted]>
Sent: Thursday, May 19, 2022 4:52 PM
To: Patel, Sanjay (CRT) <[redacted]>; Bernstein, Laura-Kate (CRT) <[redacted]>
Subject: FW: detroit FACE

Fyi. let me know if/when you guys want to chat. and/or if you want to set up a conversation with paige.

From: Fitzgerald, Paige (CRT) <[redacted]>
Sent: Thursday, May 19, 2022 3:20 PM
To: Bernstein, Bobbi (CRT) <[redacted]>
Subject: RE: detroit FACE

I've spoken with Jim and Robert (Robert just to get his thoughts, not as a decision-maker). Jim and I both think we should charge the conspiracies in both of the Detroit clinic obstructions and the TN obstruction to come, and Robert is fully supportive. We already charged 241 in the DC matter, which involved one of the Detroit targets (Idoni).

Six of the targets are involved in 2 or more incidents; 1 of those 6 is involved 3 incidents; 1 (Idoni) is involved in all 4 incidents. They knew they were violating FACE and flaunted it despite being given ample opportunity to comply with the law. If we lay down felony markers now, we may dissuade larger, potentially more dangerous obstructions later, when presumably there will be fewer clinics in operation and thus a smaller number of targets that the extremists can more easily descend upon.

And Detroit seems like it would have a jury pool that would be more accepting of the FACE Act than TN (and as mentioned before, we can't assume victory will come in any of these).

Happy to discuss (and to include Sanjay) if you'd like.

From: Fitzgerald, Paige (CRT)"<>
Sent: Thursday, May 19, 2022 10:29 AM
To: Bernstein, Bobbi (CRT) <[redacted]>
Subject: RE: detroit FACE

I'm talking with Jim and Robert at 11. Also, fwiw,the 86-year old is also in the TN case, along with five others, for a total of 6. And that case isn't charged yet and we can't assume convictions in this world right now, esp. in a place like TN.

From: Bernstein, Bobbi (CRT) <[redacted]>
Sent: Thursday, May 19, 2022 10:21 AM
To: Fitzgerald, Paige (CRT) <[redacted]>
Subject: FW: detroit FACE

FYI. Here are Sanjay's thoughts on the 241. Once you read over this, please let us know if you want to set up a time to talk. Thanks!

From: Patel, Sanjay (CRT)e[redacted]>
Sent: Thursday, May 19, 2022 8:33 AM
To: Bernstein, Bobbi (CRT) <[redacted]>
Cc: Bernstein, Laura-Kate (CRT) <[redacted]>
Subject: Re: detroit FACE

I still believe that a 248 only is the best play. Bc it's a petty offense, we can get a quick trial date before a mag judge. The fast 248 conviction will be more useful than a dragged out felony indictment that may not get to trial for over a year. These subjects are very active.

Plus, we have the Nashville 241 memo that will be going to PF soon, so the objective will be served as to five of the subjects (the "leaders").

Is this worth discussing any further, or shld we just add the 241 (assuming Frances agrees)?

On May 19, 2022, at 00:21, Bernstein, Bobbi (CRT) <[redacted]> wrote:

Talked with paige today. she is very much inclined to charge the 241s, so that the Ds will have felonies and will be barred from possessing firearms. I hadn't thought of that angle. Given the gun violence associated with hotly disputed social issues, I think she has a good point.

Can you add a 241 to the indictment memo and see if it seems convincing? If so, we can add it to the indictment. (do you think the USAO will go along with this?).

Thanks,
bobbi

Bobbi Bernstein
Deputy Chief, Criminal Section
Civil Rights Division
U.S. Department of Justice
[redacted]

EXHIBIT 120

From: Gardey, David (USAMIE)
To: Carlson, Frances (USAMIE)
Subject: RE: FACE Act - charging
Date: Thursday, June 2, 2022 3:33:39 PM

Got it. I will bring it up with Dawn and Dan at my meeting with them tomorrow and see how Dawn wants to proceed.

-----Original Message-----
From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Thursday, June 2, 2022 3:04 PM
To: Gardey, David (USAMIE) <[redacted]>
Subject: FACE Act - charging

Dave-

I had a call with the trial attorneys from the Civil Rights Division. Their bosses feel strongly about the felony charges. If we feel differently, they plan to go forward on their own with the prosecution. Of course, they would prefer to do the case with us so if it would be helpful, they would like to have a call with you and our "front office."

On another note, we interviewed the patient from the Sterling Heights incident today. Probably one of the most compelling interviews I've ever had. Her story really highlights the importance of taking these cases seriously. [redacted] would have charged them $25k to induce her and terminate her pregnancy. Not being able to afford that, they found the clinic in Sterling Heights. When she arrived for her 9am appointment, she was met by the subjects who called her a murderer and worse. Her appointment was delayed by several hours due to the subjects blocking the door. What she went through on the worst day of her life is something no one should have to endure.

Like I mentioned yesterday, we are at the point where I think our office needs to make a decision on what we want to do so please let me know what the next steps should be.

Thanks-
Frances

Frances Lee Carlson | Assistant U.S. Attorney

EXHIBIT 121

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Carlson, Frances (USAMIE)" <[redacted]>
Cc: "Bernstein, Laura-Kate (CRT)" <[redacted]>
Subject: RE: FACE Act GL ranges
Date: Mon, 13 Jun 2022 21:53:31 -0400
Importance: Normal

That's great news, Frances!

I think that Nashville was on par with these incidents.
DC was more egregious bc they entered the clinic, injured a nurse, chained themselves together, and forced a very pregnant woman to climb through a receptionist window bc of the blockade.

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Monday, June 13, 2022 8:12 PM
To: Patel, Sanjay (CRT)" <[redacted]>
Cc: Bernstein, Laura-Kate (CRT) <[redacted]>
Subject: Re: FACE Act GL ranges

Ah, good to know. Anyway, looks like my USA is on board for the felony. The one question that came up is whether the conduct was more egregious in Nashville and DC? I recall that the subjects entered the clinic in those cases so perhaps the answer is yes?

Frances Lee Carlson | Assistant U.S. Attorney

On Jun 13, 2022, at 6:00 PM, Patel, Sanjay (CRT)" <[redacted]> wrote:

Hey,
Sorry for chiming in late.
You are both correct!
They also get +2 under 3D1.4 bc 241 and 248 do not group.

So, 18 for the organizers and 14 for the remainder.

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Monday, June 13, 2022 3:02 PM
To: Bernstein, Laura-Kate (CRT) <[redacted]>; Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: FACE Act GL ranges

That's what I came up with too 😊

From: Bernstein, Laura-Kate (CRT) <[redacted]>
Sent: Monday, June 13, 2022 3:01 PM
To: Carlson, Frances (USAMIE) <[redacted]>; Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: FACE Act GL ranges

I think they are both 12s, right? 2H1.1 is the guideline for both 248 and 241. 2H1.1(a)(2) starts us at 12 for offenses involving 2+ participants.

The organizers will get up to +4 for their role. I don't think vulnerable victim applies. But either way, I think the guidelines are the same.

(But I'm new and could totally be missing something!)

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Monday, June 13, 2022 2:28 PM
To: Patel, Sanjay (CRT)e[redacted]; Bernstein, Laura-Kate (CRT) <[redacted]>
Subject: FACE Act GL ranges

Do you happen to know the GL ranges for a misdemeanor vs. felony FACE Act conviction? I'm meeting with my USA today about our case and charging decisions...

Frances Lee Carlson
Assistant U.S. Attorney
Deputy Chief, Public Corruption & Civil Rights Unit
Criminal Civil Rights Coordinator
U.S. Attorney's Office | E.D. of Michigan
[redacted] | [redacted]

EXHIBIT 122

From: "Bernstein, Laura-Kate (CRT)" <[redacted]>
To: "Carlson, Frances (USAMIE)" <[redacted]>
Subject: RE: Memo (EDMI FACE Act case)
Date: Tue, 18 Oct 2022 10:35:27 -0400
Importance: Normal
Attachments: EDMI_Indictment_Memo_for_FACE_violations_-_DRAFT.docx

---

Hi Frances – here is the draft draft draft memo – Sanjay is hoping to take a look today, but so far this is entirely unreviewed by anyone besides me :)

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Monday, October 17, 2022 5:11 PM
To: Bernstein, Laura-Kate (CRT) <[redacted]>
Subject: RE: Memo (EDMI FACE Act case)

Hi Laura-Kate! It was so nice to meet you last week! I loved meeting so many people from the Criminal Section and put faces to names/voices.

Has Sanjay had a chance to look at your memo yet? I'm curious if it is very different from the initial GJ Authorization Memo? I'm asking because my USA, who is on the AG's sub-committee for Civil Rights, has requested a memo on the status of this case. Selfishly, it would be so helpful to me to have yours to guide me.

Thanks!

From: Carlson, Frances (USAMIE)
Sent: Thursday, October 6, 2022 9:18 AM
To: Bernstein, Laura-Kate (CRT) <[redacted]>
Subject: Memo (EDMI FACE Act case)

Hi Laura-Kate:

If you don't mind, I'd love to see your charging memo when you are done with it.

Thanks!
Frances

Frances Lee Carlson
Assistant U.S. Attorney
Deputy Chief, Public Corruption & Civil Rights Unit
Criminal Civil Rights Coordinator
U.S. Attorney's Office | E.D. of Michigan
[redacted] | [redacted]

EXHIBIT 123

Memorandum

Subject:	Proposed Petite Policy Waiver for Federal Prosecution of Heather Idoni and Eva Edl concerning *In re* [redacted], (EDMI) DJ No. [redacted]	Date:	DRAFT

To:	Kristen Clarke Assistant Attorney General Civil Rights Division	From:	James Felte Chief Criminal Section

1. Subjects: Heather Idoni
   Eva Edl
2. Victim: [redacted]
   Saginaw, Michigan
3. Date of Incident: April 16, 2021
4. Statute of Limitations: 5 years (April 16, 2026)
5. Venue: Eastern District of Michigan
6. Statute: 18 U.S.C. §248(a)(1)

I. Factual and Procedural History

The Criminal Section of the Civil Rights Division and the United States Attorney's Office for the Eastern District of Michigan seek authorization to proceed with the prosecution of Heather Idoni and Eva Edl for allegedly blockading an abortion clinic in Saginaw, Michigan.

On April 16, 2021, Saginaw police officers were summoned to the [redacted] Clinic (herein "Clinic") after they received a call of two women blockading their doors. Upon their arrival, officers observed the subjects using their bodies to block the Clinic's two entrances. Both subjects admitted to responding police officers that the purpose for the blockade was to prevent patients from receiving, and clinicians from providing, abortion services.[1]

[1] The subjects, along with [redacted] others, participated in a blockade at another abortion clinic in the Eastern District of Michigan, on August 27, 2020. We are considering charging federal civil rights conspiracy and FACE Act offenses in that matter. Additionally, subjects Idoni and Edl were indicted (along with [redacted] other co-defendants) on October 3, 2022, for the similar offenses committed in the Middle District of Tennessee; and subject Idoni was charged with

Responding police recorded the subjects' blockade on body worn cameras (BWC), during which the subjects made incriminating statements. Idoni had chained herself to a doorframe with a bicycle lock around her neck blocking access, and Edl stood in front of another door that interfered with patients entering and exiting the Clinic. Both admitted to police officers that it was their intent to prevent women from obtaining abortions.

State authorities in Saginaw County, Michigan, charged Idoni and Edl with a state misdemeanor trespass offense. On June 10, 2022, the subjects were found guilty after a jury trial. The trespass conviction carried a maximum sentence of 30 days imprisonment, and a fine up to $250. Each subject was ordered to merely pay a $225 fine. The state court disposition left federal interests demonstrably unvindicated.

As discussed below, a federal FACE Act prosecution will vindicate substantial federal interests. A conviction will have a significant deterrent and punitive impact because it will make any subsequent FACE Act violation by these subjects a felony. Moreover, the Clinic's and its patients' interests will be vindicated because a FACE Act prosecution will address the specific harm caused by the subjects' conduct – interference with a federally protected right to reproductive health care.

In light of the prior state court proceedings, the Criminal Section and the United States Attorney's Office, pursuant to the Justice Department's Petite Policy, must obtain authorization from Assistant Attorney General Kristen Clarke before it may seek to charge Idoni and Edl. With this authorization, the Criminal Section and the United States Attorney's Office will be prepared to move forward with filing an indictment charging the subjects with a violation of the FACE Act.[2]

II. Application of the Petite Policy

The Department's Petite policy, set forth in Section 9-2.031 of the U.S. Attorney's Manual, mandates that three requirements must be satisfied before a successive federal prosecution may begin or continue: (1) the matter must involve a substantial federal interest; (2) the prior prosecution must have left that interest demonstrably unvindicated; and (3) the government must believe that the defendant violated a federal statute and that the admissible evidence probably will be sufficient to sustain and maintain a conviction by an unbiased trier of fact. All three requirements are met here.

1. Substantial Federal Interest

The determination of whether there is a substantial federal interest is made on a case-by-case basis, applying the principles of federal prosecutions found in USAM 9-27.230. USAM 9-2.031 (D). USAM 9-27.230 provides the following list of factors to be considered:

---

the civil rights conspiracy and FACE Act offenses (along with [redacted] other co-defendants) in a superseding indictment on October 21, 2022, in the District of Columbia.

[2] We also anticipate indicting the subjects and [redacted] other co-defendants with violations of 18 U.S.C. §§ 241 and 248(a)(1) for their participation in an unrelated abortion clinic blockade in Sterling Heights, Michigan.

A. Federal Law Enforcement Priorities

This factor supports federal prosecution. Formal department policy has declared civil rights prosecutions a high priority for federal law enforcement. *See* FBI Website, at www.fbi.gov/hq.htm (identifying civil rights prosecutions as one of nine major investigative priorities).

B. The Nature and Seriousness of the Offense

We believe that this factor, on balance, supports federal prosecution. Although the crime with which we propose to charge the subjects is a misdemeanor, the conduct in which Idoni and Edl engaged was quite serious and interfered with numerous individuals who work at, or are patients of, the clinic. Department policy places primary importance on "the actual or potential impact of the offense on the community and on the victim," USAM 9-27.230(B)(2), and acknowledge that the effect can be measured, among other ways, "in terms of erosion of the inhabitants' peace of mind and sense of security." *Id.*

Additionally, federal prosecution of this case serves an important federal interest that stems from the unusual structure of the FACE Act. The statute specifies that a first-time offense that does not result in injury or death is a misdemeanor. However, the statute also provides that a subsequent conviction for the same conduct constitutes a felony. Here, neither Idoni nor Edl have a prior FACE Act conviction. Although they have pending FACE Act prosecutions in other districts, we have no guarantee that they will be convicted in the current post-*Dobbs*[3] climate, where many states have prohibited abortion care, or seek to do so. We anticipate facing hostility in these other districts where we are pursuing FACE Act prosecutions against Idoni and Edl, both from the judiciary and the venire. Thus, it is important to prosecute these subjects federally in the Eastern District of Michigan for their conduct, so that the federal government can seek a conviction that will allow for an appropriate response if and when the subjects strike again.

C. Deterrent Effect of Prosecution

This factor supports federal prosecution. Federal prosecution in this case would have a deterrent effect by sending a message to the subjects and others who share their desire to obstruct access to reproductive health services. Also, as noted above, prosecution for this misdemeanor is a necessary prerequisite for any felony prosecution for similar misconduct in the future.

Additionally, since the Eastern District of Michigan is home to several reproductive health service facilities, the deterrent effect of a successful prosecution of these subjects would be a significant one.

D. The Subjects' Culpability in Connection with the Offense

---

[3] *Dobbs v. Jackson Women's Health Org.*, 142 S.Ct. 2228, 2279 (2022) (holding that the Constitution does not confer a right to abortion and overruling Roe v. Wade).

Idoni and Edl's culpability is easily provable based upon the BWC footage from the incident. Both subjects principally blockaded the Clinic's doors and refused to move. Idoni used chains and locks to bind herself such that responding police were forced to use bolt cutters to remove the restraints. The subjects admitted to intentionally blockading the clinic to interfere with the Clinic's and its patients' because they were exercising their reproductive health care rights. The subjects were equal participants in this obstructive conduct, and their evident motivation was criminal.

E. The Subjects' Personal Circumstances

The subjects are well known to federal authorities for their involvement with anti-abortion activities nationwide. In addition to their participation in blockades that are currently pending FACE Act prosecutions in other districts, Edl was a defendant in a civil FACE Act suit filed by the Special Litigation Section in 2017.[4] In that case, Edl was found to have violated the FACE Act.[5] Idoni has traveled around the country to participate in similar blockades involving chains and locks. In some cases, Idoni was an organizer and leader of the blockade.

Here, video footage from responding police officers' BWC show the subjects actively blockading the Clinic's doors. As those officers engaged with the subjects, they refused to leave, and instead repeatedly explained that they would continue blocking the doors and would rather be arrested than leave voluntarily. The subjects' harbor strong anti-abortion beliefs and are known to be associated with extremist groups, which suggests that they are likely to commit similar conduct in the future. In light of the subjects' backgrounds, this factor weighs in favor of prosecution by federal authorities.

F. The Victims" interests

The Clinic and their corresponding national Non-Governmental Organizations (NGO) stakeholders are very committed to pursuing a federal prosecution. The Clinic has informed the FBI that they are routinely targeted by anti-abortion protesters, and that the subjects' conduct in this case was an egregious example of activity that has a profound psychological impact on the Clinic's staff and its patients. For example, BWC footage from the blockade captured the statement of the Clinic's manager, [redacted] admonishing responding police officers for negotiating with the subjects prior to arrests. [redacted] who is Black, stated, "If this was me laying out here, I'd have six shots in my back right now." Similarly, NGOs, including the National Abortion Federation and Feminist Majority Foundation, have on several occasions contacted federal authorities and expressed their and the Clinic's strong interest in the Department of Justice pursuing a federal FACE Act prosecution here.

G. The Probable Sentence

---

[4] *See U.S. v. Thomas*, et al, 17-cv-432 (WDKY).

[5] A prior civil FACE Act violation does not serve as a prerequisite for subsequent felony charges. The prior conviction must be a criminal offense.

This factor also weighs in favor of federal prosecution. The subjects were sentenced in state court to simply pay a fine of $225 each. A FACE Act conviction will provide a conviction that will serve as a prerequisite for a future felony charge for similar conduct. The subjects have demonstrated, and all but admitted, that they will continue to engage in obstructive conduct that interferes with the provision of abortion care because of their strongly held ideologies. Through this prosecution, we may be able to bring future felony charges against the subjects.

In summary, consideration of the factors listed in USAM 9-27.230 demonstrates that there is a substantial federal interest in this case.

2. Substantial Federal Interest Demonstrably Unvindicated

The second requirement for obtaining a Petite policy waiver is that the prior prosecution must have left a substantial federal interest demonstrably unvindicated. USAM 9-2.031(D). Although the Petite policy generally presumes that a prior state prosecution vindicates federal interests, this presumption is rebuttable. In this case, the presumption should not apply because the federal interest in the subjects' obstruction of the community's freedom of access to clinics was not addressed by the state trespass conviction. Additionally, a successful federal prosecution is necessary to vindicate this interest because the instant federal prosecution of a misdemeanor offense will allow federal authorities to bring felony charges against the subjects in the case of a subsequent offense. The misdemeanor FACE Act conviction coupled with the prospect of future felony charges for similar conduct vindicates the substantial federal interest.

3. Likelihood of Conviction of a Federal Offense

Finally, for a waiver of the Department's Petite policy to be appropriate, the government must believe that the subject's conduct constituted a federal offense, and that the admissible evidence probably will be sufficient to obtain and sustain a conviction by an unbiased trier of fact. USAM 9-2.031(D).

In this case, the subject were video recorded blockading the Clinic's entrances. In that same recording, the subjects admitted that it was their intent to prevent the Clinic from providing, and its patients from obtaining, abortion care. Coupled with witness testimony, we believe that the admissible video evidence will easily prove a FACE Act violation beyond a reasonable doubt.

III. Conclusion

This case warrants federal prosecution because the state prosecution alone will not have the same deterrent effect as a federal conviction. The subjects have both demonstrated and admitted that they will continue to engage in obstructive conduct that targets abortion providers and patients. With a misdemeanor FACE Act conviction here, the subjects can be charged with a future federal felony. Federal prosecution in this case will also vindicate a strong federal interest. We therefore seek approval from Assistant Attorney General Kristen Clarke to prosecute Heather Idoni and Eva Edl for a violation of 18 U.S.C. § 248(a)(1).

EXHIBIT 124

Memorandum

KC:RJM:JF:PF:BB:SP:LKB:pg
DJ No. [redacted]

Subject:	Proposed *Petite* Policy Waiver for Federal Prosecution of Heather Idoni and Eva Edl concerning *In re* [redacted] *Clinic*, (EDMI)	**Date:**	November 30, 2022

To:	Kristen Clarke Assistant Attorney General Civil Rights Division	**From:**	JamesFelte Chief Criminal Section
Through:	Robert J. Moossy, Jr. Deputy Assistant Attorney General Civil Rights Division		Paige Fitzgerald Principal Deputy Chief Bobbi Bernstein Deputy Chief Sanjay Patel Laura-Kate Bernstein Trial Attorneys

1.	Subjects:	Heather Idoni EvadEdl
2.	Victim:	[redacted] Clinic Saginaw, Michigan
3.	Date of Incident:	April 16, 2021
4.	Statute of Limitations:	5 years (April 16, 2026)
5.	Venue:	Eastern District of Michigan
6.	Statute:	18 U.S.C. §248(a)(1)

I. Introduction

The Criminal Section of the Civil Rights Division and the United States Attorney's Office for the Eastern District of Michigan seek authorization to pursue prosecution of Heather Idoni and Eva Edl, for a misdemeanor violation of the FACE Act, despite a previous prosecution by the state, which resulted in a $225 fine, related to one of two incidents currently subject to federal charges. In light of the prior state court proceedings, the Criminal Section and the United States Attorney's Office, pursuant to the Justice Department's *Petite* Policy, must obtain authorization from Assistant Attorney General Kristen Clarke before it may seek to charge Idoni and Edl for the

charge related to the same incident for which she was prosecuted by the state. If authorization is granted, the Criminal Section and the United States Attorney's Office will be prepared to move forward with filing an indictment charging the subjects with a violation of the FACE Act.[1]

II. Factual and Procedural History

On April 16, 2021, Saginaw police officers were summoned to the [redacted] Clinic (herein "the Clinic") after they received a call of two women blockading their doors (while dozens of protesters demonstrated on the adjacent sidewalk). Upon arrival, officers observed the subjects using their bodies to block the Clinic's two entrances, while the sidewalk protesters video recorded the incident. Both subjects admitted to responding police officers that the purpose for the blockade was to prevent patients from receiving, and clinicians from providing, abortion services.

Additionally, responding police recorded the subjects' blockade on body worn cameras (BWC), during which the subjects were recorded committing the offense and making incriminating statements. Idoni had chained herself to a doorframe with a bicycle lock around her neck blocking access, and Edl stood in front of another door that interfered with patients entering and exiting the Clinic.

State authorities in Saginaw County, Michigan, charged Idoni and Edl with a state misdemeanor trespass offense. On June 10, 2022, the subjects were found guilty after a jury trial. The trespass conviction carried a maximum sentence of 30 days imprisonment, and a fine up to $250. Each subject was ordered merely to pay a $225 fine. This state court disposition left federal interests demonstrably unvindicated.

As discussed below, a federal FACE Act prosecution will vindicate substantial federal interests. A conviction will have a significant deterrent and punitive impact because it will make any subsequent FACE Act violation by these subjects a felony. Moreover, the Clinic's and its patients' interests will be vindicated because a FACE Act prosecution will address the specific harm caused by the subjects' conduct – that being the psychological impact caused by the subjects' interference with a federally protected right to access and provide reproductive health care. Specifically, the Clinic's staff has complained about the fear and intimidation the subjects and their associates caused when the protesters filmed staff and patients accessing the Clinic during the instant blockade. The deterrent effect of a FACE Act prosecution would help assuage these concerns.

III. Application of the *Petite* Policy

The Department's *Petite* policy, set forth in Section 9-2.031 of the Justice Manual, mandates that three requirements must be satisfied before a successive federal prosecution may begin or continue after resolution of a state prosecution: (1) the matter must involve a substantial

---

[1] We also anticipate indicting the subjects and [redacted] other co-defendants with violations of 18 U.S.C. §§ 241 and 248(a)(1) for their participation in an unrelated abortion clinic blockade in Sterling Heights, Michigan. Additionally, subjects Idoni and Edl were indicted (along with nine other co-defendants) on October 3, 2022, for the similar offenses committed in the Middle District of Tennessee; and subject Idoni was charged with civil rights conspiracy and FACE Act offenses (along with nine other co-defendants) in a superseding indictment on October 21, 2022, in the District of Columbia. These charges do not implicate the *Petite* policy.

federal interest; (2) the prior prosecution must have left that interest demonstrably unvindicated; and (3) the government must believe that the defendant violated a federal statute and that the admissible evidence probably will be sufficient to sustain and maintain a conviction by an unbiased trier of fact. All three requirements are met here.

1. Substantial Federal Interest

The determination of whether there is a substantial federal interest is made on a case-by-case basis, applying the principles of federal prosecutions found in JM 9-27.230. JM 9-27.230 provides the following list of factors to be considered:

A. Federal Law Enforcement Priorities

This factor supports federal prosecution. Formal department policy has declared civil rights prosecutions a high priority for federal law enforcement. *See* FBI Website, at https://www.fbi.gov/about/mission/fbi-strategy (identifying civil rights as one of eight mission priorities). In fact, following the Supreme Court's decision in *Dobbs v. Jackson Women's Heath*[2], Attorney General Garland announced that, "The Justice Department will work tirelessly to protect and advance reproductive freedom," and that "the Department will continue [to use the FACE Act] to protect healthcare providers and individuals seeking reproductive health services." *See* Attorney General Merrick B. Garland Statement on Supreme Court Ruling in Dobbs v. Jackson Women's Health Organization | OPA | Department of Justice.

B. The Nature and Seriousness of the Offense

We believe that this factor, on balance, also supports federal prosecution. Although the specific federal crime that gives rise to invocation of the *Petite* Policy is a misdemeanor, the conduct in which Idoni and Edl engaged was quite serious and interfered with numerous individuals who work at, or are patients of, the Clinic. Department policy places primary importance on "the actual or potential impact of the offense on the community and on the victim," JM 9-27.230, and acknowledge that the effect can be measured, among other ways, "in terms of erosion of the inhabitants' peace of mind and sense of security." *Id.*

Additionally, federal prosecution of this case serves an important federal interest that stems from the unusual structure of the FACE Act. The statute specifies that a first-time offense that does not result in injury or death is a misdemeanor. However, the statute also provides that a subsequent conviction for the same conduct constitutes a felony. Here, neither Idoni nor Edl has a prior FACE Act conviction. Although neither defendant has been convicted of a prior FACE Act violation, both have committed (and been charged with) other violations. As repeat offenders, they are more culpable than other one-time violators. Additionally, they have made statements indicating that they intend offend again when given the opportunity. The likelihood of recidivism

[2] *Dobbs v. Jackson Women's Health Org.*, 142 S.Ct. 2228, 2279 (2022) (holding that the Constitution does not confer a right to abortion and overruling *Roe v. Wade*).

makes it important for the government to pursue a misdemeanor FACE conviction now, so that any future offense will be a felony.[3]

It is important to prosecute these subjects in the Eastern District of Michigan for their conduct, so that the federal government can seek a conviction that will allow for an appropriate response if and when the subjects engage in further criminal activity.

C. Deterrent Effect of Prosecution

This factor supports federal prosecution. Federal prosecution in this case would have a deterrent effect by sending a message to the subjects and others who share their desire to obstruct access to reproductive health services. Also, as noted above, prosecution for this misdemeanor is a necessary prerequisite for any felony prosecution for similar misconduct in the future.

Additionally, since the Eastern District of Michigan is home to several reproductive health service facilities, the deterrent effect of a successful prosecution of these subjects would be a significant one.

D. The Subjects' Culpability in Connection with the Offense

Idoni and Edl's culpability is easily provable based upon the BWC footage from the incident. Both subjects principally blockaded the Clinic's doors and refused to move. Idoni used chains and locks to bind herself such that her arrest was delayed because responding police had to acquire bolt cutters to remove the restraints. The subjects admitted to intentionally blockading the Clinic to interfere with its providers and patients because they were exercising their reproductive health care rights. The subjects were equal participants in this obstructive conduct, and their evident motivation was criminal.

E. The Subjects' Personal Circumstances

The subjects are well known to federal authorities for their involvement in activities nationwide that violate the FACE Act. In addition to their participation in blockades that are currently pending FACE Act prosecutions in other districts, Edl was a defendant in a civil FACE Act suit filed by the Special Litigation Section in 2017.[4] In that case, Edl was found to have violated the FACE Act.[5] Idoni has traveled around the country to participate in similar blockades involving chains and locks. In some cases, Idoni was an organizer and leader of the blockade.

---

[3] Although any FACE Act conviction—including one that might result from the pending MDTN prosecution, or from the FACE Act charge that will be included in the current indictment but which is not subject to *Petite* analysis—would also serve to make any future violation a felony, the mere possibility of a conviction for another violation does not lessen the federal interest in pursuing a FACE Act violation in this instance. Despite the strength of the evidence in those other cases, there are jury nullification risks in these matters and there is no guarantee that any of those charges will result in convictions. Thus, it is important to pursue charges for all of the defendants' multiple violations, in order to ensure that future violations can be charged as felonies.

[4] *See U.S. v. Thomas*, et al, 17-cv-432 (WDKY).

[5] A prior civil FACE Act violation does not serve as a prerequisite for subsequent felony charges. The prior conviction must be a criminal offense.

Here, video footage from responding police officers' BWC show the subjects actively blockading the Clinic's doors. As those officers engaged with the subjects, they refused to leave, and instead repeatedly explained that they would continue blocking the doors and would rather be arrested than leave voluntarily. Edl and Idoni have close affiliations with the extremist organization Operation Save America (OSA), which has, over the years, sponsored multiple blockades of abortion clinics nationwide. In 2017, OSA advertised and promoted a blockade in Louisville, Kentucky, that Edl participated in and was prosecuted for civilly by the Special Litigation Section; and in July 2022, OSA sponsored blockades of clinics in Nashville, Tennessee, that are the subject of a civil FACE Act suit brought by the providers. The subjects' adherence to the extremist positions of this group make recidivism almost inevitable. In light of the subjects' backgrounds and history, this factor weighs in favor of federal prosecution.

F. The Victims' Interests

The victims at the Clinic are very committed to pursuing a federal prosecution. These victims have informed the FBI that they are routinely targeted by anti-abortion protesters, and that the subjects' conduct in this case was an egregious example of activity that causes extreme fear on the part of the Clinic's staff and its patients. Representatives from national Non-Governmental Organizations (NGOs) have also expressed fear for their stakeholders in other places. Footage from this incident showed a large group of regular protesters, including a subject well known to federal authorities (Calvin Zastrow), who is a known leader and organizer of blockades nationwide. Zastrow, who is also the subject of the related FACE Act investigation in Sterling Heights, Michigan, and a defendant in the pending FACE Act prosecution in the Middle District of Tennessee, has close ties with Idoni and Edl. The Clinic's NGO representatives, who are very familiar with Zastrow, Idoni and Edl from blockades that have targeted their other member-clinics nationwide, have expressed their concern about these subjects targeting other clinics—frightening and endangering other victims—if the subjects are not prosecuted here.

G. The Probable Sentence

This factor also weighs in favor of federal prosecution. The subjects were sentenced in state court to simply pay a fine of $225 each. A FACE Act conviction will provide a misdemeanor conviction that will serve as a prerequisite for a future felony charge for similar conduct. The subjects have demonstrated, and all but admitted, that they will continue to engage in obstructive conduct that interferes with the provision of abortion care because of their strongly held ideologies. Through this prosecution, we may be able to bring future felony charges against the subjects that would hopefully act as a deterrent, if not to them, then to others.

In summary, consideration of the factors listed in JM 9-27.230 demonstrates that there is a substantial federal interest in this case.

2. Substantial Federal Interest Demonstrably Unvindicated

The second requirement for obtaining a *Petite* policy waiver is that the prior prosecution must have left a substantial federal interest demonstrably unvindicated. JM 9-2.031. Although the *Petite* policy generally presumes that a prior state prosecution vindicates federal interests, this presumption is rebuttable. In this case, the presumption is overcome because the federal interest

in the subjects' obstruction of the community's freedom of access to clinics was not addressed by the state trespass conviction. The Clinic and their NGO representatives have repeatedly requested that federal authorities investigate the incident and bring a FACE Act prosecution to deter the subjects from victimizing other clinics in the future, and because of the psychological impact of this incident specifically, and anti-abortion activity at the Clinic generally, on the staff and patients. Both groups have reported experiencing fear and anxiety after the subjects blockaded the Clinic as dozens of protesters encouraged their criminal conduct and antagonized patients in the Clinic's parking lot.

Additionally, a successful federal prosecution is necessary to vindicate this interest because the instant federal prosecution of a misdemeanor offense will allow federal authorities to bring felony charges against the subjects in the case of a subsequent offense. A misdemeanor FACE Act conviction coupled with the prospect of future felony charges for similar conduct will serve as a deterrent for future criminal acts and vindicate the substantial federal interest.

3. Likelihood of Conviction of a Federal Offense

Finally, for a waiver of the Department's Petite policy to be appropriate, the government must believe that the subject's conduct constituted a federal offense, and that the admissible evidence probably will be sufficient to obtain and sustain a conviction by an unbiased trier of fact. JM 9-2.031.

In this case, the subjects were video recorded blockading the Clinic's entrances. In that same recording, the subjects admitted that it was their intent to prevent the Clinic from providing, and its patients from obtaining, abortion care. Coupled with witness testimony, we believe that the admissible video evidence is sufficient to establish a FACE Act violation beyond a reasonable doubt to a fair and impartial jury.

IV. Conclusion

This case warrants federal prosecution because the state prosecution alone did not vindicate the victims' interests, and does not have the same deterrent effect as a federal conviction. The subjects have both demonstrated and admitted that they will continue to engage in obstructive conduct that targets abortion providers and patients. With a misdemeanor FACE Act conviction here, the subjects can be charged with a future federal felony. Federal prosecution in this case will also vindicate a strong federal interest. We therefore seek approval from Assistant Attorney General Kristen Clarke to prosecute Heather Idoni and Eva Edl for a violation of 18 U.S.C. § 248(a)(1).

☑ Approved

Kristen Clarke

☐ Not Approved

Kristen Clarke

EXHIBIT 125

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Carlson, Frances (USAMIE)" <[redacted]>, "Bernstein, Laura-Kate (CRT)" <[redacted]>
Subject: RE: recap of arraignment dates
Date: Fri, 10 Mar 2023 08:50:31 -0500
Importance: Normal
Inline-Images: image001.png

Ugh...always a veritable circus with these cases.
Thanks for the update!

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Friday, March 10, 2023 8:46 AM
To: Patel, Sanjay (CRT) <[redacted]>; Bernstein, Laura-Kate (CRT) <[redacted]>
Subject: RE: recap of arraignment dates

There were about 20-30 people that protested outside the courthouse. Fortunately, not the side that we use! Then, I'd say about 15-20 of them came into duty court to watch the arraignments, which were LONG. Unfortunately, we ended up with a very Catholic magistrate on duty this week and he was very particular about the bond conditions and not infringing on their first amendment rights. At the end, we ended up with overly lawyered bond conditions that would be difficult to enforce!

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Friday, March 10, 2023 8:19 AM
To: Bernstein, Laura-Kate (CRT) <[redacted]>; Carlson, Frances (USAMIE) <[redacted]>
Subject: RE: recap of arraignment dates

Happy Friday, LK and Frances –
Any update on how this week's appearances went?
Any grandstanding outside the courthouse?
Thanks,
SP

From: Bernstein, Laura-Kate (CRT) <[redacted]>
Sent: Monday, February 27, 2023 4:18 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: FW: recap of arraignment dates

FYI

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Monday, February 27, 2023 3:59 PM
To: Michael Miedona <[redacted]>
Cc: Bernstein, Laura-Kate (CRT) <[redacted]>; Doddamani, Sunita (USAMIE)

<[redacted]>

Subject: recap of arraignment dates

Def number	DEF	Arraignment Date
1	Calvin Zastrow	3/7/2023
2	Chester Gallagher	3/7/2023
3	Heather Idoni	3/6/2023
4	[redacted]	3/14/2023
5	Joel Curry	3/16/2023
6	Justin Phillips	3/6/2023
7	Eva Edl	3/14/2023
8	Eva Zastrow	3/7/2023

Frances Lee Carlson
Assistant U.S. Attorney
Deputy Chief, Public Corruption & Civil Rights Unit
Criminal Civil Rights Coordinator
U.S. Attorney's Office | E.D. Michigan
[redacted] | [redacted]

EXHIBIT 126

From: [redacted] <[redacted]
To: "Bernstein, Laura-Kate (CRT)"t<[redacted]>
Subject: Re: FACE voir dire (LK) (w bb edits)
Date: Sun, 17 Mar 2024 21:01:01 -0400
Importance: Normal

Or just add a few places like NPR and whatever the local liberal stations are.

Happy to chat thru the other concern if you want. I might be more conservative than most on this, but to me there's a difference btw the court saying something on its own & US proposing it, and also a difference difference between asking the court to say something in jury instructions versus asking the court to say it in jury selection.

Say hi hi to frances for me!

Sent from my iPhone

On Mar 17, 2024, at 7:52 PM, Bernstein, Laura-Kate (CRT) <[redacted]> wrote:

Thanks! I will definitely run these by Frances. The abortion question is I think verbatim from DC, but I get that DC and EDMI may be two very different places.

For the list of news sources – those are all of the places that Steve Crampton (on of the defense attorneys) has been on his press rampage claiming that the gov is persecuting Christians for praying for mothers. I can leave it at the more general "have you heard about this case in the news" though.

From: Bernstein, Bobbi (CRT)"<[redacted]>
Sent: Saturday, March 16, 2024 7:28 PM
To: Bernstein, Laura-Kate (CRT) <[redacted]
Subject: FACE voir dire (LK) (w bb edits)

LK: see my comments/questions.

I think I might have a different view on some of these than the folks who have gone before. I've mostly tried cases in front of southern, conservative judges, and it's easy for me to see some of them being upset by some of these proposals (the questions that seem very one-sided). I love what you're trying to do, but I worry that it might backfire. That said, I would defer heavily to frances, who will know the judge. Please just run some of my concerns by her and see what she thinks.

Happy to chat, anytime.

bobbi

EXHIBIT 127

To: "Carlson, Frances (USAMIE)" <[redacted]>, "Doddamani, Sunita (USAMIE)" <[redacted]>

Subject: proposed voir dire

Importance: Normal

Attachments: U.S._v._Zastrow_et_al_gov_proposed_voir_dire_5.16.docx

---

I cleaned up our previous list and took out the questions already covered by the questionnaire. Here's what's left. I'm frankly less concerned about proposed voir dire now that we've got the questionnaire – I feel like following up on the answers to the questionnaire will be what we need.

I took out the one about religion, because I think we'd decided it would never fly, but if you remember differently or have another way to ask the question we can add to this! Sita, I know you'd talked about asking specifically about religion, how often people go to services, etc...I'm just struggling to think of an anodyne way to ask the question.

Laura-Kate Bernstein
Trial Attorney

Criminal Section
Civil Rights Division
U.S. Department of Justice
[redacted]

EXHIBIT 128

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

Case No. 23-cr-20100
HON. MATTHEW F. LEITMAN

D-1 CALVIN ZASTROW,
D-2 CHESTER GALLAGHER,
D-3 HEATHER IDONI,
D-5 JOEL CURRY,
D-6 JUSTIN PHILLIPS,
D-7 EVA EDL, and
D-8 EVA ZASTROW,

Defendants.
/

GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

The Government hereby submits the following voir dire questions for the Court's consideration.

Respectfully Submitted.

DAWN N. ISON
United States Attorney

Frances Lee Carlson
Sunita Doddamani
Assistant United States Attorneys
[redacted]

Detroit, Michigan 48226-3200
[redacted]

Laura-Kate Bernstein
Trial Attorney
Civil Rights Division, Criminal Section
U.S. Department of Justice
950 Pennsylvania Ave. NW
Washington, DC 20530
Phone: [redacted]
Fax: [redacted]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

Case No. 23-cr-20100
HON. MATTHEW F. LEITMAN

D-1 CALVIN ZASTROW,
D-2 CHESTER GALLAGHER,
D-3 HEATHER DONI,
D-5 JOEL CURRY,
D-6 JUSTIN PHILLIPS,
D-7 EVA EDL, and
D-8 EVA ZASTROW,

Defendants.
_____ a a a /

GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

1. Are you familiar with the facts of this case from any source?

2. The [redacted] Clinic is located at [redacted] Sterling Heights, MI. Do any of you work or live in the area of [redacted] in Sterling Heights?

3. The [redacted] Clinic is located at [redacted], Saginaw, MI. Do any of you work or live in the area of [redacted] in Saginaw?

4. The government is represented by Assistant United States Attorneys Frances Carlson and Sunita Doddamani from the United States Attorney's Office for the Eastern District of Michigan and Trial Attorney Laura-Kate Bernstein from the Department of Justice's Civil Rights Division, and they will be assisted by paralegal Maria Koch.

a. Do any of you know these individuals?

b. Have you ever worked for or otherwise dealt with the United States Attorney's Office or the Department of Justice's Civil Rights Division?

5. The defendants in this case are Calvin Zastrow, Chester Gallagher, Heather Idoni, Joel Curry, Justin Phillips, Eva Edl, and Eva Zastrow. Do any of you know:
   a. Calvin (also known as "Cal") Zastrow?
   b. Chester (also known as "Chet") Gallagher?
   c. Heather Idoni?
   d. Joel Curry?
   e. Justin Phillips?
   f. Eva Edl?
   g. Eva Zastrow?

6. Other than Defendants Heather Idoni and Chester Gallagher, who haves elected to represent ~~herself~~ themselves in this case, the defendants are each represented by defense counsel. Do any of you know:
   a. Arthur Weiss?
   b. Bradley Friedman?
   ~~c. Brennan Tyler Brooks?~~
   c. Stephen Crampton?
   d. Paul Stablein?
   e. [Counsel for Defendant Curry] ~~Robert Dunn?~~
   f. David Peters?
   g. Lisa Dwyer?
   h. Pamella Szydlak?

7. Are any of you familiar with the Thomas More Society?

8. Are any of you familiar with the Pacific Justice Institute?

9. Does any member of the panel know any other member of the panel, for example from work, school, socially, prior jury service, or one's neighborhood?

10. Are any of you familiar with: ~~[Government's witnesses]~~
    a. [redacted]?
    b. [redacted]?
    c. [redacted]

d. [redacted]?
e. [redacted]?
f. [redacted]?
g. [redacted]?
h. [redacted]?
i. [redacted]?
j. [redacted]?
k. [redacted]?
l. [redacted]?
m. FBI Special Agent [redacted]?

11. Are any of you familiar with [defense witnesses]? ~~[Defendants' witnesses]~~

12. In this case, you may hear testimony from federal and local law enforcement officers. Would any of you be inclined to give greater or lesser weight to a law enforcement officer's testimony than that of other witnesses, simply because of their status as a law enforcement officer?

13. During this trial, you may learn that the government has entered into a cooperation agreement or court-approved plea agreement with a witness. You may hear that, as part of an agreement, the witness has agreed to testify in the hopes of receiving more lenient treatment by law enforcement in return for truthful cooperation with the government. Agreements such as these are lawful and the government is permitted to enter into them.

    a. Do you have any opinion – whether positive or negative – about witnesses who testify for the prosecution under such agreements?

~~14. Have you ever served on a grand jury?~~

~~a. if yes, provide the details, including what court.~~

~~15. Have you ever served as a juror in a [redacted] case, either in a federal court or a court anywhere else?~~

~~a. if yes, what court?~~
~~b. if yes, were you foreperson?~~
~~c. if yes, did the jury reach a verdict (but do not share what verdict you reached)?~~

~~*These questions apply to you, members of your immediate family, and your close friends*~~

~~16. Have you, or any members of your family or close friends, ever been employed by any law enforcement agency?~~

~~17. Have you, or any members of your family or close friends, ever been employed by the courts?~~

~~18. Have you, or any members of you family or close friends, had an experience with law enforcement, or with any person associated with or employed by the United States Attorney's Office, the Department of Justice's Civil Rights Division, or the Court, which would make it difficult for you to be a fair and impartial juror in this case?~~

~~19. Have you, or any members of your family or close friends, ever been employed by a criminal defense attorney or been involved in any way in the defense of a criminal case?~~

~~20. Are you, or any members of your family or close friends, a lawyer, or have you, or any members of your family or close friends, ever worked for a lawyer, or ever studied law?~~

~~21. Have you, or any members of your family or close friends, ever been a victim of or a witness to a similar crime as the crimes charged in this case?~~

~~22. Have you, or any members of your family or close friends either been a victim of, or witness to, or arrested or convicted of any crime which has so affected you that it could interfere with your ability to be fair and impartial in this case?~~

~~23.~~ 14. Although this case will mention abortion, I want to be clear that this case is not about whether abortion is right or wrong, morally justified or unjustified. Nor is it about whether abortion should or should not be legal. ~~None of those things are relevant to this case.~~ This case is about two laws that permit reproductive health clinics – including clinics that provide abortion services – to do so without physical obstruction. Having said that, I will ask whether you have any personal, political, moral, or religious opinions or beliefs regarding the issue of reproductive health care – including abortion.– that are so deeply held that they could interfere with your ability to be fair and impartial in this case?

~~24. Do you, a family member, or a close friend belong to any group or organization or contribute to any group or organization that advocates for or~~

against any aspect of reproductive health care including, but not limited to, abortion.

25. Have you, a family member, or a close friend ever participated in any protest, march, or rally, or petitioned or contacted government representatives, regarding reproductive health care?

26. Have you, a family member, or a close friend ever observed any reproductive health care protests, marches, or rallies on either side of the issue?

27. Although this case will mention religious beliefs, I want to be clear that this case is not about whether you share or don't share, agree or disagree, with any particular religious belief. Under the law, which I will explain fully to the jury at the end of trial, if one commits a crime under the belief, however sincere, that his or her conduct was religiously or morally required, that is no defense to the commission of a crime. Having said that, I will ask whether you have any hesitation regarding this aspect of the law; that is, would anybody have any difficulty rendering a guilty verdict against a person whose crime was committed out of religious or moral belief?

The following questions apply only to you.

28. To reach a verdict, as jurors will take an oath to do, every juror must agree to the verdict. That is, any verdict must be unanimous. In deliberations, you must consider the opinions and points of your fellow jurors. In the final analysis, however, you must be personally satisfied with any verdict. Would you have any difficulty expressing your own opinions and thoughts about this case to fellow jurors?

29. I expect this case to take approximately TIME to try, until around DATE. We will not hold trial on April 23 or 24. Does anyone have any pressing commitment that would make sitting on this jury a hardship?

30. Does anyone, due to health problems, medication, or the like, feel that they cannot sit on this jury?

31. Does anyone have any difficulty seeing or hearing that would make it difficult for you to follow or receive the evidence presented in this case, or for which you would need an accommodation?

~~32. Do you have any religious or moral beliefs, social, political, or philosophical, or any other beliefs that would interfere with being a member of this jury and returning a fair and impartial verdict solely on the evidence?~~

~~33. Do you have any religious or moral beliefs, social, political, or philosophical, or any other beliefs that would interfere with your ability to sit in judgment of the defendants in this case?~~

~~34.~~15. Would you for any reason hesitate to enforce the laws involved in this case?

16. Will you follow the instructions of the law that the Court will give you, regardless of whether or not you agree with those instructions?

~~35.~~

~~36.~~17. Does anyone have any strong feelings, for or against, the FBI or the U.S. Department of Justice? ~~If yes, please explain.~~

~~37.~~18. Is there anyone who believes the FBI or Department of Justice pursues criminal investigations and/or prosecutions for reasons other than the impartial pursuit of justice?

~~38.~~19. There have been numerous criminal incidents throughout the country that have targeted reproductive health care clinics and pregnancy crisis and counseling centers. Have you seen any of the media reports on any of these other incidents? Have you formed any impressions regarding those incidents?

~~39.~~20. Have you heard about or seen any media coverage about this case or about these defendants?

~~40. Do any of you read or watch the following news sources:~~

~~a. The Epoch Times~~
~~b. The Mike Huckabee show?~~
~~c. The Matt Walsh Show?~~
~~d. The Daily Wire?~~
~~e. One America News Network?~~
~~f. CBN News, also known as Christian Broadcasting News?~~
~~g. Fox News?~~
~~h. The Ingraham Angle?~~
~~i. Read Lion?~~

~~j. America Military News?~~
~~k. National Catholic Register?~~

Commented [LB1]: remove
Bernstein, Laura-Kate (CRT)
2024-05-14 17:25:00

~~41.~~21. Is there any reason that you can think of, whether or not it has been covered by a previous question, why you could not sit fairly, attentively, and impartially in this case?

EXHIBIT 129

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 23-cr-20100
v. HON. MATTHEW F. LEITMAN

D-1 CALVIN ZASTROW,
D-2 CHESTER GALLAGHER,
D-3 HEATHER IDONI,
D-5 JOEL CURRY,
D-6 JUSTIN PHILLIPS,
D-7 EVA EDL, and
D-8 EVA ZASTROW,

Defendants.
_____/

JUROR QUESTIONNAIRE INSTRUCTIONS

Dear Prospective Juror:

You are on the jury panel for the case listed above. This questionnaire is designed to obtain information about you, to use in deciding your qualifications to serve as a juror in this case. The purpose of these questions is to determine whether prospective jurors can impartially decide this case based upon the evidence presented at trial and the instructions on the law given by the presiding judge. The questions are not intended to unnecessarily inquire into personal matters; all information obtained will be kept confidential.

You are sworn to give true and complete answers. Your answers will be available only to the court and the attorneys for the parties. The questionnaires belong to the court and all copies will be returned to the court. You are instructed not to discuss this case or the questionnaire with anyone, including your family, fellow jurors, or anyone else.

Although some of the questions may appear to be of a personal nature, please understand that the Court and the attorneys for the parties must learn enough information about each juror's background and experiences to select a fair and impartial jury. ~~Your cooperation is of vital importance.~~ Please answer each question as fully and completely as possible. Your complete candor and honesty are necessary so that both the prosecution and the defense will have a meaningful opportunity to select a fair and impartial jury.

You must answer all the questions to the best of your ability. If you do not know the answer to a question then write, "I don't know." If the question does not apply to you, write "N/A." Please fill out the entire Questionnaire. **DO NOT LEAVE ANY QUESTION BLANK.** It is important that the answers be yours alone.

~~Unless the question states otherwise, the fact that a particular question is asked does not imply that the subject matter of the question is an issue in this case. As you read the questions, you are not to draw any inferences about the issues which must be decided in this case.~~

~~Please keep in mind that there are no "right" or "wrong" answers, only complete and incomplete answers. Complete answers are far more helpful than incomplete answers so please answer all the questions to the best of your ability. Citizens in our community have different views and perspectives on many topics. The same holds true for prospective jurors. You are simply asked to provide honest and complete answers. Later, during individual questioning, you will be given an opportunity to explain or expand your answers, if necessary. If there is a question or topic that you prefer to discuss privately with the judge, please indicate "Private" next to the question. All of the information you provide will be kept confidential and only viewed by the Judge, the Clerk's Office, and the members of the prosecution and defense teams. Remember, *you are sworn to give true and complete answers to all questions.*~~

The indictment in this case charges ~~all~~ seven defendants with two crimes: (1) Conspiracy Against Rights; and (2) ~~Freedom to Access Clinic Entrances~~Clinic Access Obstruction. Two ~~defendants, Heather Idoni and Eva Edl,~~ of the seven defendants are charged with a second count of: (3) ~~Freedom to Access Clinic Entrances~~Clinic Access Obstruction.

In Count (1), the indictment alleges that all defendants conspired or agreed to block access to the entrance of a clinic that provides ~~women~~ reproductive health ~~center~~ services in Sterling Heights, Michigan. The indictment alleges they did this to

Commented [CF(1]: I know these preliminary instructions are from Castro, but I think they are too long...
Carlson, Frances (USAMIE)
2024-04-26 08:17:00

Commented [BLK(2]: I'd take out their names
Bernstein, Laura-Kate (CRT)
2024-04-25 20:34:00

Commented [CF(3R2]: The reason to name them is in case anyone in the venire knows them?
Carlson, Frances (USAMIE)
2024-04-26 08:16:00

oppress or intimidate patients of the clinic from obtaining ~~seeking~~ reproductive health services or employees from providing those services. Obtaining and~~Seeking or~~ providing reproductive health services is a right guaranteed under the laws of the United States.

In Count (2), the indictment alleges that all defendants intentionally interfered with patients and employees of ~~the clinic~~a clinic that provides reproductive health services in Sterling Heights, Michigan by using their bodies to physically obstruct the entrance to the clinic, and that they did so because patients and employees were obtaining or providing reproductive health services.

Count (3) of the indictment only applies to two of the seven defendants, ~~Heather Idoni and Eva~~ Edl and alleges they intentionally interfered with patients and employees of a clinic that provides reproductive health services in ~~clinic in~~ Saginaw, Michigan by using their bodies to physically obstruct the entrance to the clinic, and that they did so because patients and employees were obtaining or providing reproductive health services.

The charges are not any evidence of guilt; there is a presumption of innocence applicable to ~~the~~ each defendant on each charge. The defendants haveas entered a pleas of not guilty to all of the charges against ~~him~~them.

The jury in this case will be asked to listen to the evidence presented in court and make their decision based ONLY on the evidence they hear in court, without outside influence.

As a member of this jury panel, you are instructed that you **MUST NOT** do any research of any kind in relation to this case and must not talk to anyone else about it. You are NOT allowed to:

- Read or research anything related to this case.
- Listen to any discussion related to this case.
- Talk to anyone about this case, including your spouse/partner and other family members.

Jury selection is scheduled to start on or about August 6, 2024, running ____i a.m. to ____ip.m. and is expected to last approximately ____i____i____i____i Presentation of evidence will begin once a jury is selected and will last two to three weeks.

At the end of the questionnaire, you will be required to sign a true declaration stating under penalty of perjury that the answers you have provided on the questionnaire are true. correct, and complete ~~and that no one has assisted you in~~

Commented [DS(4]: Please review.
Doddamani, Sunita (USAMIE)
2024-04-25 12:18:00

Commented [DS(5]: Fill in.
Doddamani, Sunita (USAMIE)
2024-04-25 12:25:00

Commented [BLK(6]: Technically, this is not what the signature block states
Bernstein, Laura-Kate (CRT)
2024-04-25 21:02:00

Commented [CF(7R6]: True. Added the penalty of perjury language to the declaration.
Carlson, Frances (USAMIE)
2024-04-26 08:33:00

~~providing information and/or respondingto the best of your knowledge~~. ~~You must answer truthfully and honestly and will be asked to affirm that you did so at the end of the questionnaire under penalty of perjury.~~

Please use a black or blue ink pen. **DO NOT** write on the back of the page. There is extra space at the end of this questionnaire if you run out of space for any question. Please write your juror number on the top right corner of each page where indicated. **PLEASE PRINT OR WRITE LEGIBLY.**

After you have completed, signed, and turned in the questionnaire, you may leave. You will be notified by the Clerk's Office when to report for jury duty. Do not discuss the questionnaire or your answers with any member of your household, family, friends, co-workers, fellow jurors, court personnel, or anyone else. Do not conduct your own research, including using the internet or any other electronic media, and from this point forward, do not read or watch any news reports about this case. You must not gather, or attempt to gather, any information or otherwise investigate this case or any issues related to it.

Thank you for your cooperation,
Hon. Matthew F. Leitman
United States District Judge

JUROR QUESTIONNAIRE

Personal Background

1. Juror Number_____ ¡Name_____

2. Which of the following reflects your current relationship status?

□ Single □ Married □ Living with someone □ Divorced
□ Widowed □ Separated

3. City or community you currently live in: _____

a. How long have you lived there: _____

b. If you have lived at your current address less than 5 years, please list where else you have lived in the last 10 years (without providing your exact address):

_____

4. Do you have children? If so, how many and what are their age ~~ranges~~s: _____

_____

5. What is your current or most recent job? (Please indicate if you are retired, do not work outside the home, unemployed, disabled, or a student)

a. Employer: _____

b. Job Title: _____

c. How long have you had (or did you have) this job: _____

d. Job duties: _____

6. Please briefly describe the types of jobs you have held in the last 10 years:

_____

_____

_____

7. What is your highest level of education?

□ less than high school □ high school graduate □ Technical/trade school

□ some college □ college graduate □ graduate school

Major/degree: _____ ¡School attended: _____

Commented [DS(8]: This may all feel a bit smushed, but I'll worry about spacing between each question once we finalize that we like the overall format and content.
Doddamani, Sunita (USAMIE)
2024-04-25 12:30:00

Commented [CF(9R8]: Yes for sure. it does look smushed.
Carlson, Frances (USAMIE)
2024-04-26 08:34:00

Commented [DS(10]: Added this.
Doddamani, Sunita (USAMIE)
2024-04-25i11:55:00

8. If married, or sharing a household with another adult, please describe that person's job. (Please indicate if they are retired, do not work outside the home, unemployed, disabled, or a student)

a. Employer: _____

b. Job Title: _____

c. How long have you had (or did you have) this job: _____

d. Job duties: _____

9. Other than a spouse/partner or children, who else lives in your household?

a. Relationship to you: _____

b. Age: _____

c. Occupation (if any): _____

10. What is your spouse/partner's highest level of education or degree?

_____

11. Have you ever served in any branch of the armed forces of the United States (including the military reserves, National Guard, or ROTC)?

□ Yes □ No

If yes, please list what branch of service, the approximate years of service, highest rank attained, and places where you were stationed:

_____

_____

If yes, did you ever participate in a court martial? □ Yes □ No

If yes, please describe your role and the charges: _____

_____

12. What do you like to do in your spare time? What are your interests or hobbies?

_____

13. What is your main source of news?

□ Radio □ TV □ Newspaper

□ Internet/Social Media □ Family/friends □ I don't follow the news

14: What are your sources of news? (Check all that apply)

□ Network TV (ABC/NBC/CBS)	□ CNN	□ Fox News
	□ Newsmax	□ MSNBC
□ Washington Post	□ USA Today	□ New York Times
□ Detroit News	□ MLive	□ Detroit Free Press
□ Wall Street Journal	~~□ MLive~~	□ WWJ New Radio 950
□ Twitter/X	□ Facebook	□ YouTube
□ TikTok	□ Truth Social	□ Yahoo News
□ The Epoch Times	□ The Daily Wire	□ The Mike Huckabee Show
□ One America News Network	□ The Matt Walsh Show	□ Christian Broadcasting News
		□ Tucker Carlson
□ The Ingraham Angle	□ Read Lion	□ American Military News
□ National Catholic Register	□ Daily Signal	□ LiveAction.org
	□ The Strange Report	□ The Steve Deace Show
		□ I do not follow the news

□ Other: _____

15. Do you listen to any podcasts? □ Yes □ No

If ~~yes~~YES, please list your top three favorites: _____

Contact and Experiences with Crime, Courts, Legal System, and Law Enforcement

16. Have you ever served on a jury or grand jury in state or federal court?

If yes, please check the appropriate box:

	Yes	No	Don't know

Commented [BLK(11]: I think we should delete some of the smaller ones, this feels one-sided on conservative news sources.
Bernstein, Laura Kate (CRT)
2024-04-25 20:40:00

Commented [CF(12R11]: agree
Carlson, Frances (USAMIE)
2024-04-26 08:36:00

Commented [DS(13]: I actually liked this better than listing out all the possible podcasts.
Doddamani, Sunita (USAMIE)
2024-04-25 12:31:00

Commented [DS(14]: I like this chart better with checkboxes, because often people don't remember the details of their service, but if you give them options, it helps them recollect.
Doddamani, Sunita (USAMIE)
2024-04-25 12:32:00

Commented [BLK(15R14]: I think there needs to be an "n/a" column so people who didn't serve have a box to check for q's like "did you reach a verdict"
Bernstein, Laura Kate (CRT)
2024-04-25 20:41:00

I have served on a grand jury.			
I have served as a juror in a jury trial.			
I was the foreperson of the jury.			
It was a criminal case in which I was asked to return a verdict of guilty or not guilty.			
It was a civil case in which I was asked to return a verdict for money damages to a plaintiff.			
Did you reach a verdict in a criminal case?			
Did you reach a verdict in a civil case?			
Was there anything about your jury experience that left you disappointed or dissatisfied with our justice system?			

If you answered yes to the last statement, please explain why: _____

_____

_____

17. Have you ever been a witness in a civil or criminal case in state or federal court?

□ Yes □ No

18. Have you ever been a party (plaintiff or defendant) in a civil case in state or federal court?

□ Yes □ No

If yes, please briefly describe the case and outcome: _____

_____

_____

19. Have you, your spouse/domestic partner, or anyone close to you been involved in a claim, dispute, lawsuit, or any legal proceeding with any federal, state or local government agency ~~or its officers, agents, or employees~~? (e.g. been sued by the United States, a state, or city; been required by a government agency to make modifications to your business; been the subject of an enforcement action, been in a property dispute with a government entity; _____)

□ Yes □ No

If yes, please briefly explain: _____

_____

Commented [CF(16]: The problem with this format is there are a lot of jurors that will have served more than once and this format doesn't allow for a clear answer.
Carlson, Frances (USAMIE)
2024-04-26 08:45:00

Commented [CF(17R16]: I also think each sub-question should be numbered a, b, c, etc. It makes it easier to refer to particular answers.
Carlson, Frances (USAMIE)
2024-04-26 08:48:00

Commented [CF(18]: I would capitalize or bold this. Jurors don't read very carefully and we want to make sure they explain.
Carlson, Frances (USAMIE)
2024-04-26 08:53:00

Commented [DS(19]: Please edit any of this. Just wanted to list so it gave some examples.
Doddamani, Sunita (USAMIE)
2024-04-25 12:33:00

Commented [DS(20]: Other?
Doddamani, Sunita (USAMIE)
2024-04-25 12:32:00

Commented [CF(21R20]: I don't think we should give examples.
Carlson, Frances (USAMIE)
2024-04-26 08:46:00

20. Have you, a close family member, or close friend ever been the victim of a crime (whether or not that crime was reported to the police)?

□ Yes □ No

a. If yes, please provide the following information for each person and incident:

Relationship: (self, sibling, etc.)	Type of crime:	Reported to police?	Was anyone caught?	Outcome of case?

How have these incidents affected your attitude toward persons charged with a crime, law enforcement, and the criminal justice system in general?

How do you feel the police, law enforcement, authorities, or prosecutor handled these situations?

You may hear the testimony of police officers or federal agents. If the Court instructs you that you must judge them the same way you would judge any other witness in this case, can you follow that instruction? If no, please explain:

21. Except for traffic tickets, have you, a family member, or close friend ever been the subject of a criminal investigation, charged with a crime, or convicted of a crime?

□ Yes □ No

If yes, please explain:

Commented [DS(22]: or:
You may hear the testimony of police officers, federal agents, and/or corrections personnel. Do you agree that their testimony is not to be considered any differently than any other witness and is not entitled to any additional weight?
Yes/No.
Doddamani, Sunita (USAMIE)
2024-04-25 12:10:00

Commented [BLK(23R22]: I'd be fine with getting rid of this question all together, I feel like it draws attention to maybe a non-issue. We learn their feelings about LE elsewhere.
Bernstein, LauraKate (CRT)
2024-04-25 20:44:00

Commented [CF(24R22]: Agree
Carlson, Frances (USAMIE)
2024-04-26 08:50:00

a. What was the nature of the offense:_____
b. Were you/they charged with a crime? If so, what after you/they were charged?_____
c. Would this experience influence your ability to reach a verdict based only on the evidence in this case?

□Yes □ No

If yes, briefly explain: _____

_____

22. Have you ever had an experience, either positive or negative, with any law enforcement officer or any government agency that could influence your verdict?

□ Yes □No

If yes, please briefly explain: _____

_____

_____

23. Have you, a family member, or close friend ever been employed by any prosecutor's office, law enforcement agency, or other federal, state, or local government agency?

□ Yes □ No

If yes, briefly explain:

a. Identify the employee: _____
b. Describe your relationship to the employee: _____
c. Identify the employer: _____
d. Approximate date of employment: _____
e. Job title and description: _____

24. Are any members of your family attorneys or otherwise associated with the ~~members of the~~ legal profession, or do you have close friends who are associated with the legal profession? _____

□ Yes □ No

If yes, please briefly explain: _____

_____

Commented [BLK(25]: This was confusing to me - is there a plain-er way to say "who"? This may be as good as we can do.
Bernstein, Laura-Kate (CRT)
2024-04-25 20:45:00

Commented [CF(26R25]: I think we should just say, If YES, please explain.
Carlson, Frances (USAMIE)
2024-04-26 08:55:00

Commented [BLK(27]: I generally don't like two-part yes-no questions, but I think having an explanation line makes it ok. What do yall think?
Bernstein, Laura-Kate (CRT)
2024-04-25 20:46:00

25. Have you, a close family member, or friend ever been employed by anyone involved in criminal defense work, such as a private defense attorney, public defender, or private investigator?

☐ Yes ☐ No

If yes, briefly explain:

a. Identify the employee: _____
b. Describe your relationship to the employee: _____
c. Identify the employer: _____
d. Approximate date of employment: _____
e. Job title and description: _____

26. Have you ever volunteered, been employed, or applied for work in any local law enforcement field or agency, such as the police or sheriff; federal law enforcement (i.e. FBI, ATF, DEA, IRS, Homeland Security, or Postal Inspection Service); private security; or as a probation, parole, or corrections officer?

If yes, please describe the job and approximate dates:_____

_____

27. Do you have strong personal feelings about any recent court cases that might interfere with your ability to be fair and impartial in this case? If yes, please explain:

_____

_____

_____

28. How do you feel about each of the following groups or agencies? (check one per row)

	Extremely Positive	Positive	Neutral	Negative	Extremely Negative
Police Officers Generally	☐	☐	☐	☐	☐
~~The~~ Sterling Heights Police Department	☐	☐	☐	☐	☐
~~The~~ Saginaw Police Department	☐	☐	☐	☐	☐

Commented [CF(28]: I'd just say If YES, please explain
Carlson, Frances (USAMIE)
2024-04-26 08:56:00

Commented [CF(29]: I think we can take this out
Carlson, Frances (USAMIE)
2024-04-26 08:56:00

Commented [CF(30]: To be consistent, we should do a check box for yes/no, and then a follow up If YES, please explain
Carlson, Frances (USAMIE)
2024-04-26 08:57:00

Commented [BLK(31]: I LOVE THIS. I feel like it could be the entire questionnaire. If we fight for nothing else, let's fight for this.
Bernstein, Laura-Kate (CRT)
2024-04-25 20:49:00

~~The~~ U.S. Department of Justice	❒	❒	❒	❒	❒
~~The~~ Federal Bureau of Investigation ("FBI")	❒	❒	❒	❒	❒
~~The~~ United States Attorney's Office	❒	❒	❒	❒	❒
Criminal Defense Attorneys	❒	❒	❒	❒	❒
Prosecutors	❒	❒	❒	❒	❒
Abortion clinics	❒	❒	❒	❒	❒
Pro-life counseling centers	❒	❒	❒	❒	❒
The organization Planned Parenthood	❒	❒	❒	❒	❒
The organization Right to Life	❒	❒	❒	❒	❒

Commented [DS(32]: Was going to put in "women's reproductive health centers" in but thought no one would know what those are. Cutting right to the heart of it by calling them abortion clinics.
Doddamani, Sunita (USAMIE)
2024-04-25 11:01:00

Commented [CF(33]: We could condense the last 4 and just add a line for "Abortion Rights Organizations" and "Pro-Life Organizations." I think people would have the same feelings about abortion clinics and abortion orgs or pro-life clinics and pro-life orgs
Carlson, Frances (USAMIE)
2024-04-26 09:00:00

29. Do you have any strong opinions or feelings, whether positive or negative, about the Federal Bureau of Investigation (FBI), the U.S. Department of Justice, the United States Attorney's Office, or the United States Government?

□ Yes □ No

If yes, please explain: _____

_____

_____

Commented [BLK(34]: This feels redundant of the above question now, but I like having an explanation line. I wonder if we delete q 29, and under the checkmark q, above, include : "if you marked 'extremely positive' or 'extremely negative' to any of the above, please explain."
Bernstein, Laura-Kate (CRT)
2024-04-25 20:50:00

Commented [CF(35R34]: Agree
Carlson, Frances (USAMIE)
2024-04-26 08:58:00

Questions About This Case

30. Have you, a family member, or close friend ever been employed, applied for work, or volunteered at any hospital, medical facility, health clinic or other business providing any health care services?

□ Yes □ No

If yes, briefly explain:

a. Identify the employee/volunteer:_____
b. Describe your relationship to the person: _____
c. Identify the facility or business: _____
d. Approximate date of employment: _____
e. Job title and description: _____

31. This case involves blocking access to the delivery of reproductive health services. The term "reproductive health services" means reproductive health services provided in a hospital, clinic, physician's office, or other facility, and includes medical, surgical, counselling or referral services relating to the human reproductive system, including services relating to pregnancy or the termination of a pregnancy. Do you have any opinions or beliefs regarding the issue of reproductive health services that would make it difficult for you to serve on this jury?

□ Yes □ No

If yes, please explain: _____

_____

_____

32. On a scale of 1-10, how would you rank the important of the issue abortion to you, whether for or against, with 1 being "unimportant" and 10 being "the most important" issue to you? _____

33. Do you, a family member, or a close friend belong to any group or organization, or do you contribute money to any group or organization, that advocates regarding any aspect of reproductive health care (e.g. Planned Parenthood, Right to Life, Americans United for Life, National Abortion Federation, etc.)

□ Yes □ No

If yes, please explain: _____

_____

_____

34. Have you, a family member, or a close friend ever participated in any protest, march, or rally regarding any political issue?

□ Yes □ No

If yes, have any of the protests involved issues related to reproductive health care, as defined above in question #i_: _____

_____

_____

35. Have you, a family member, or a close friend had any life experiences that would affect your ability to be fair and impartial in a case involving reproductive health services?

□ Yes □ No

If yes, please explain: _____

_____

_____

36. Do you have any political, moral, intellectual ~~or~~, religious, or other beliefs or opinions which might prevent you from following the Court's instructions on the law or which might slant your approach to this case? _____

□ Yes □ No

If yes, please explain: _____

_____

_____

37. Do you have any religious beliefs that would affect your ability to sit in judgement in this criminal case?

□ Yes □ No

If yes, please explain: _____

_____

_____

If you identify with any particular religion, do you routinely attend religious services?

□ Yes □ No

If yes, how often do you attend? _____

Do your religious beliefs impact your ability to be fair and impartial in this case?

□ Yes □ No

Commented [DS(36]: Fill in once numbering finalized.
Doddamani, Sunita (USAMIE)
2024-04-25i11:05:00

Commented [CF(37]: I think all these sub-questions should be indented to make it clear that it relates to the larger question above.
Carlson, Frances (USAMIE)
2024-04-26 09:03:00

Commented [DS(38]: Or, as Frances wrote the question:

Do you have any personal, religious, moral, philosophical, or other beliefs that would make it difficult for you to sit in judgment of another person, or that would prevent you from applying the law given to you by the Court to the evidence of the case?

If yes, please explain.
Doddamani, Sunita (USAMIE)
2024-04-25 11:31:00

Commented [CF(39R38]: I would mimic the descriptors we use above.
Carlson, Frances (USAMIE)
2024-04-26 09:05:00

Commented [BLK(40]: I wonder if the court will balk at this being limited to religious. Maybe we include the same list as q.36?
Bernstein, Laura-Kate (CRT)
2024-04-25 20:53:00

If yes, please explain: _____

38. Do you have any opinions about this case?

☐ Yes ☐ No

If yes, please explain: _____

Commented [DS(41]: You asked me to put the question down to see how it reads. I smushed it into this question as a sub-part because its all kind of related.
Doddamani, Sunita (USAMIE)
2024-04-25 11:15:00

Commented [BLK(42R41]: I vote we cut it. I think the judge will hate the first q, given that alito statement he referenced at the PTC, and the second question has already been asked a couple of ways.
Bernstein, Laura-Kate (CRT)
2024-04-25 21:01:00

Commented [CF(43R41]: Yes, I agree we take it out. One thought though is that in the personal background section when we ask about whether they have children, we could use the question from my Castro case that asks about their schooling. Some of the options in the list include Catholic School and other religious school or something like that. Might be an indirect way to get some more info about religion without directly asking it.
Carlson, Frances (USAMIE)
2024-04-26 09:07:00

Criminal Trial Procedures

39. Could you vote to convict or acquit someone accused of violating a law regardless of your personal feelings about the law?

☐ Yes ☐ No ☐ Maybe

If no or maybe, please explain: _____

40. In a criminal case, the Government must prove a defendant's guilty "beyond a reasonable doubt." Do you understand and agree that proof "beyond a reasonable doubt" does not mean proof beyond all possible doubt?

☐ Yes ☐ No

If no, please explain: _____

41. The jury must not consider the issue of punishment when deciding whether a defendant is guilty or not guilty. Can you apply that principle when determining whether the defendants are guilty or not guilty of the alleged crimes? _____

Commented [CF(44]: If we include these, I think that we should add questions that a defendant would want to know too such as something about presumption of innocence and/or right to remain silent
Carlson, Frances (USAMIE)
2024-04-26 09:08:00

☐ Yes ☐ No

If no, please explain: _____

_____

_____

Logistical Issues

The trial of this case is expected to last approximately 2–3 weeks. The hours of trial will typically be ____ am through ____ pm, Monday through Friday, although the Court may change the schedule on some days. Jurors will be paid an attendance fee of $50 per day, and transportation costs (mileage and parking) will be reimbursed. Jury service is one of the highest duties and privileges of a United States citizen. The participation of a cross-section of citizens is essential to the proper administration of justice. The Court recognizes that not everyone can serve on a case of this length. However, mere inconvenience or the usual financial hardships of jury service will not be enough to excuse you from service. You must show that service as juror in this case would cause an unacceptable personal hardship. With this in mind, please answer the following questions:

42. Do you have a language, hearing, eyesight problem, or other condition, or taking medication that makes it difficult for you to serve as a juror?

□ Yes □ No

If yes, please explain what affect it has and if any accommodation could be made to make it less difficult for you to serve as a juror:_____

_____

_____

43. Does a close family member or friend have a medical or physical condition that would make it difficult for you to serve as a juror?

□ Yes □ No

If yes, please explain: _____

_____

_____

44. Are there any circumstances taking place in your life, whether personal, family, work, or other that prevents you from devoting your full attention during a trial beginning on August 6, 2024 and lasting approximately 3 weeks?

□ Yes □ No

If yes, please explain: _____

_____

_____

45. Is there anything else not covered by this Questionnaire that you think the Judge/Court should know that may affect your jury service in this case, or that may influence your ability to fairly and impartially judge the evidence in this case and apply the law as given to you by the Court?

☐ Yes ☐ No

If yes, please explain: _____

_____

_____

I HEREBY STATE UNDER PENALTY OF PERJURY THAT ALL THE ANSWERS GIVEN IN THIS QUESTIONNAIRE ARE TRUE, CORRECT, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

DATED: _____, 2024.

_____

Juror's Signature

_____

Juror's Printed Name _____

Commented [CF(45]: I would add a space for jurors to elaborate on previous answers in case they ran out of room.

Also, the affirmation should go on a separate page. That's the way the jury dept wants it
Carlson, Frances (USAMIE)
2024-04-26 09:10:00

EXHIBIT 130

To: "Carlson, Frances (USAMIE)" <[redacted]>, "Doddamani, Sunita (USAMIE)" <[redacted]>

Subject: RE: Almost

Date: Sun, 18 Aug 2024 13:19:40 -0400

Importance: Normal

Attachments: Rebuttal.v1_LKb.docx

Don't worry about it, I'm stealing glances in between kid stuff anyways. Sita, I loved the chapters you've put together! I put some comments in the margins, but you should definitely take them or leave them. If it's stressful to tinker the day before closings, ignore me!

From: Carlson, Frances (USAMIE) <[redacted]>
Sent: Sunday, August 18, 2024 1:15 PM
To: Doddamani, Sunita (USAMIE) <[redacted]>; Bernstein, Laura-Kate (CRT) <[redacted]>
Subject: Almost

I'm sorry this is taking me so long. I'm doing the PPT as I write. I'm almost done. I just need to address Count 3, which I don't plan to spend a ton of time on. Then, I need to read it over and then I'll send on. So, maybe within the next hour?

Frances Lee Carlson
Assistant U.S. Attorney
Deputy Chief, Public Corruption & Civil Rights Unit
Criminal Civil Rights Coordinator
U.S. Attorney's Office | E.D. Michigan
[redacted] | [redacted]

Rebuttal

Ladies and gentlemen, thank you for your time and attention in this trial. This is our chance to talk about the points the defense raised:

"This was a peaceful protest and we didn't try to intimidate anyone."

Peaceful protest has nothing to do with this charge. It's a misunderstanding of the law to think it does.

What the law in Ct. 1 guarantees is people's ability to exercise their right to access a clinic and get reproductive health care. The defendants oppressed, or prevented people from exercising that right by blockading the doors. How did they oppress that right? They actually obstructed the doors with their bodies and they created an atmosphere that made patients not want to get out of their cars and workers of the clinic feel trapped inside.

Let's talk about this crime in Ct 1 – Conspiracy Against Rights. This is not a crime of violence. This is a different type of crime. This type of crime is maybe not what you would imagine when you come to federal court. This is a crime against civil rights. Civil rights are the personal rights all Americans have that are guaranteed by the law. Things like being able to vote in elections and freedom of speech. This crime is about taking away a right – taking away a personal freedom. In America, you get to believe what you want, but you can't take those beliefs and shove them down other people's throats because you don't agree with them. That's what the law is supposed to protect, the freedom to make your own choices, even if someone else disagrees with them.

In this case, the law guarantees that people who want to access reproductive health care get to do that. Employees that want to provide reproductive health care get to do that. And when these defendants agreed and decided to take that away, they prevented people from exercising their rights. That's the crime.

I want you to take what they did and put it in any other context – let's say these defendants went to a polling place, held hands, sang songs, and very peacefully blocked anyone from casting a ballot. That would be oppressing a person's right to vote.

They oppressed a right here. The right to access a clinic free from obstruction. The fact that they did it peacefully by singing hymns and praying is meant to distract you. They still used their bodies to physically blockade and take away that right.

What's interesting is that after all these witnesses, the facts aren't really at issue – the prosecution and defense aren't far off on what happened here. It's all on video. (No one is in disagreement that these defendants worked together to block the doors of the clinic.)

They want you to misunderstand the law by talking about how nice they were when they were breaking the law. They want you to think peacefulness is a defense in this case. It's not. Being a nice person is not a defense. Having religious beliefs are not a defense to this crime. They don't have anything to do with whether or not you did the crime.

The defense has called their actions "peaceful protest." But, the defendants knew the difference between "protesting" and "blockading." They called themselves blockaders. They admitted to blockading in their own words. You can call it whatever you want: when you prevent someone from

Commented [DS(1]: Visual: Frances' ct: 1 slide
Doddamani, Sunita (USAMIE)
2024-08-17 22:46:00

Commented [DS(2]: Visual: exhibit with Os blocking door. Maybe Cal's photo? 6 series?
Doddamani, Sunita (USAMIE)
2024-08-17 22:47:00

Commented [DS(3]: Reference video exhibits for them to write down.
Doddamani, Sunita (USAMIE)
2024-08-17 16:04:00

Commented [DS(4]: Reference FB records calling it a blockade.
Doddamani, Sunita (USAMIE)
2024-08-17 16:05:00

exercising their right, even peacefully, the word that you call it, how you describe it, has no bearing on the law here. The word they use for it doesn't matter. Their actions matter.

The one act alone of "physical obstruction" of the entrance to the clinic is enough. But we have so much more here to show they "oppressed" people from getting inside and out of the clinic and exercising their right. You heard about the atmosphere they created. From people outside the building in the parking lot trying to get in:

- [redacted]: Following people around the building.
- [redacted]: Coming up to people's cars, knocking on their windows, making them feel trapped.
- Showing them graphic images, saying things like "you can stop a murder from happening" and "don't do this to your baby," "repent for your sins," and "god hates the hands that shed innocent blood."
- Video exhibit 20 showed: Recording people without their permission and taking their pictures while some are making the most sensitive medical decisions of their lives.

You heard from people inside the building about the atmosphere they created:

- [redacted] (manager of clinic): The sheer number of people surrounding the building worried people inside who didn't know what they were going to do.
- They weren't leaving even though they were repeatedly told to get off the private property.
- [redacted]: Kept their bodies against the doors so she had a hard time getting them locked again while her hands were shaking.
- Telescopic lens camera taking picture of their cars and patients in the parking lot.

Not only did they obstruct the doors of the clinic, which is enough for this crime, they created an atmosphere of fear to keep people from exercising their rights to get or give reproductive health services.

Let's talk about this for a second – this law also protects people who provide these services. The defense has been focused on the patients in this case. They've provided plenty of thoughts on the "mothers"/patients in this case. But, they have provided zero to explain why these defendants were justified in taking this right to provide reproductive health services away from workers at this clinic. These clinic workers have a right under the law to provide these services to patients.

The law the judge gives you says you get to consider the "natural and probable consequences" of the defendants' actions on others to figure out what they were trying to do.

What does that mean? That means when you do things, the way other people feel about it, what they might naturally feel about it, are things you can consider when you decide whether these defendants were trying to keep people from going in and out of that clinic.

Taking video of people and their cars without their permission who come to a clinic for some of the most sensitive medical decisions of their lives is trying to make them turn away. I'd be turning away if I saw this at a grocery store, let alone a clinic.

Commented [DS(5]: Different screenshot of them blocking the door. Probably exhibit 13 still.
Doddamani, Sunita (USAMIE)
2024-08-17 22:53:00

Commented [DS(6]: Visual: screenshot of Cal and Eva Zastrow surrounding Renee/patient.
Doddamani, Sunita (USAMIE)
2024-08-17 22:53:00

Commented [DS(7]: Visual: screenshot of [redacted] car with Eva Zastrow at the window.
Doddamani, Sunita (USAMIE)
2024-08-17 22:54:00

Commented [DS(8]: Exhibit sticker: Reference exhibit of joel curry video saying this.
Doddamani, Sunita (USAMIE)
2024-08-17 16:23:00

Commented [DS(9]: Visual: Cal's photo of patient. Screenshot of Cal taking photos/videos.
Doddamani, Sunita (USAMIE)
2024-08-17 16:24:00

Commented [DS(10]: Visual: exhibit of them from inside view.
Doddamani, Sunita (USAMIE)
2024-08-17 22:55:00

Commented [DS(11]: Visual: exhibit of stillshot with guy with long camera lense that [redacted] described.
Doddamani, Sunita (USAMIE)
2024-08-17 22:56:00

Calling people who come to a clinic for an abortion a "baby murderer" or telling them to "repent for their sins" is a way to turn people away. It's a way to take away their right.

These women overreacted to what we were politely doing.

They are essentially calling the employees and patients snowflakes. In their view, these women were just overreacting like women do. Which is stereotypical nonsense.

There was a wide range of emotional reactions by witnesses over the course of the trial to how the defendants' coordinated action impacted them that day.

There was:

1. [redacted] – the employee of the clinic stuck in her car, now a labor and delivery nurse, who testified she was called a baby murderer. She told you:
   - She "didn't feel great"
   - Didn't feel safe to get out of her car until police arrived.
   - The experience was anxiety provoking, but afterward she "put a good face on" and went to work to finish the day and put it behind her.
   - She told you she felt exhausted. Angry. Disappointed.

2. [redacted] – manager of the clinic, worked there 20 years. She had seen protestors there every day for 20 years but had not experienced anything like this. She seemed like a tough lady and finished her day too. But after she went home she sat in her shower and cried for an hour.

3. [redacted] – young lady that came in Thursday. She told you how her hands shook when she tried to reengage a lock to the patient entrance. She went back to work after the incident and finished the day to support patients. She said she didn't think it affected her on that day, but ultimately [redacted]. And then she returned to work.

4. [redacted] – husband of [redacted]. He told you how he was angry, sad, and worried for his wife. How this blockade took a terrible and horrible day and made it so much worse. He told you that images from that day, from that blockade didn't go away afterward – what he saw and heard in that parking lot affected him, separate and distinct from the feelings he had [redacted]

5. [redacted] – who displayed a reaction 4 years later of just pure devastation. [redacted] She came in here and from the moment she entered into the courtroom, she started crying. And then she sobbed for 40 minutes straight on the witness stand while answering questions.

   It was hard to hear and hard to see. Now, just for a moment imagine how hard it was for her to come in here – 4 years after the worst day of her life – and sit 5 feet away from 7 people who

Commented [BLK(12]: I LOVE THIS. Victim blaming 101.
Bernstein, Laura-Kate (CRT)
2024-08-18 10:03:00

Commented [DS(13]: Visual: exhibit 18 interspersed with stillshots from videos showing location of each witness, animated to appear when I discuss them.
Doddamani, Sunita (USAMIE)
2024-08-17 22:58:00

Commented [DS(14]: Visual: stillshot of [redacted] coming out of the employee door from exhibit 13.
Doddamani, Sunita (USAMIE)
2024-08-17i22:59:00

Commented [DS(15]: Visual: stillshot of view from patient entrance foyer.
Doddamani, Sunita (USAMIE)
2024-08-17 23:00:00

Commented [BLK(16]: I'm trying to think of stronger language then sort out her feelings. This was when she teared up and described that she had to go to therapy. Held it in for months [redacted]
Bernstein, Laura-Kate (CRT)
2024-08-1810:08:00

Commented [DS(17]: Visual: stillshot of exhibit 13 where [redacted] car is shown with Eva Zastrow up near the glass.
Doddamani, Sunita (USAMIE)
2024-08-17 23:00:00

are a living reminder of that day. Imagine how hard it was for her to come in here and tell a courtroom full of strangers about the worst day of her life.

It was a big reaction. But it was not an overreaction. There is no appropriate or universal way to react to something like this. No one gets to tell [redacted] how she should grieve. No one gets to tell her how to react to what happened to her. Not the government, not the Judge, and certainly not the defendants (and certainly not Mr. Peters who suggested....)

She testified the way she did because of her unique circumstances. Which is why we called a range of witnesses because there was a range of emotions. You know what all those witnesses said regardless of what background they brought to this situation? They ALL said they were some form of anxious, nervous or scared. Every one of them.

Our blockade was a short time, so it doesn't count. We just delayed appointments.

There is no minimum time requirement in the law for this blockade. You will not see any instruction from the court that we have to prove the blockade lasted a minimum of 1 hour or even 1 minute. This crime is completed and successful when a person is blocked for count 2 & 3. Period.

In Count 1, the crime is complete and successful when they agree to take away these patients and employees' rights to obtain or provide reproductive health services.

So, even if all these people that left did come back and got their services later, these defendants still kept them from exercising their right to get in or out of that clinic when the patients and employees were ready to.

This isn't a defense to the crime. Why it gets mentioned by the defense is to imply that this is no big deal. But this crime, this blockade, had a lasting impact on people as I detailed earlier. They certainly wouldn't agree this was no big deal.

We were trying to offer "hope and help."

This was not some conspiracy to talk to "mothers" so they could change their mind. If you're trying to convince someone to change their ind, you don't make the decision for them and THEN tell them they have a choice. It's not a voluntary decision when you've already made it for them.

They were forcing women to talk to them by blocking the doors so they couldn't get to their appointment, but at the same time saying they were trying to "persuade" them to not go to their appointment.

The blockade was the thing that was forcing women to talk to them – you can't have one without the other. The blockade was built in to talking to them all along. It wasn't a verbal blockade. It was a physical blockade.

[redacted] said it best: "we were forcing these women to not go to their appointments, but trying to persuade them not to go to their appointments at the same time."

Commented [BLK(18]: Another thought I had on the hope and help would be to give an example of deprivation of rights in which there's no interaction at all. For example:

The defendants insist that they were peaceful and polite throughout the blockade. First of all, you can decide for yourself whether that's even true, but, even if they were the kindest, politest people on the planet, it really doesn't matter. What matters is whether they agreed to prevent women from freely exercising their right to go in that clinic and choose RHS.

Think about it this way. We all have the right to vote. I think we all agree on that (look back and make direct and prolonged eye contact with Joel Curry lol). Imagine that someone decides to steal all the mail in ballots out of the mailboxes of a certain neighborhood. Steals the ballots and destroys them. In that scenario, without ever even interacting with a victim - rude, polite, whatever - without ever even interacting with a victim, our imaginary bad guy is intentionally depriving people of the right to vote. It really doesn't matter if the defendants were perfect angels. What matters is that the agreed to intentionally prevent women from exercising their right to obtain or provide RHS.
Bernstein, Laura-Kate (CRT)
2024-08-18 12:29:00

There wasn't anything voluntary or helpful in this blockade. [redacted] said she didn't see one meaningful conversation take place between any member of the holiness revival team and any woman there. She mostly just saw angry women that did not want to talk to them.

They weren't there to offer "hope and help." Their goal was to turn people away. To eliminate their choice. You didn't see any evidence of any of these defendants trying to "convince" women not to have abortions. You saw evidence that these defendants *made sure* that no women could make that choice.

If a woman came to the door, had a conversation with the defendants and decided to go through with her appointment, they weren't moving for her. Because that wasn't the goal. The goal was keep women from exercising their right.

Look at the exhibits:

4B:

"Joel Curry: Somebody is turning away already. This is good. Pray that she would turn to repent and to trust in Jesus. He's the only way."

4C:

"C. Zastrow: Two have driven away so far.

Curry: That's good. Praise the Lord."

The Holy Spirit Defense: "We were guided by the Holy Spirit individually and didn't agree with others to blockade."

Maybe they were guided by the Holy Spirit. I can't speak to these defendant's relationship with god, but what I can say is that no matter what moved them or guided them, each individual made a decision to participate in this blockade with other humans.

The evidence shows they all worked together to block those doors. Their statements afterward showed they worked together. They may have been guided by a higher power, but here on earth their agreement was with each other. No matter what guided them, each of them made a decision to be the self-annointed deciders for the patients and employees of the clinic.

Taking away people's rights in the name of the holy spirit is still taking away people's rights and breaking the law.

This is nothing but an attack on Christianity by the DOJ.

We've seen evidence, lots of it, that the defendants have deeply held beliefs about abortion. We've heard a lot about when and whether these defendants rely on the holy spirit for guidance. I want to be clear on something. Here, in America, these defendants are free to *believe* whatever they want. They have that freedom, we all do. They can believe whatever they want about abortion. They can grip tightly their belief that women should not be able to obtain RHS. They can believe that their version of

Commented [BLK(19]: Whatiaboutsomething like:

There wasn't anything voluntary or helpful in this blockade. [redacted] said she didn't see one meaningful conversation take place between any member of the holiness revival team and any woman at the clinic. She said it best, when Chet Gallagher was questioning her: a conversation takes two people. We all heard Mr. Gallagher tell her that these conversations "aren't about the women," and he was right. These weren't conversations. This was a group of people who weren't interested in what any of the women in the parking lot had to say. They were interested in one thing: making sure no one could make the choice to obtain RHS.
Bernstein, Laura-Kate (CRT)
2024-08-18 10:23:00

Commented [DS(20]: Does this make sense? I'm trying to marry two ideas here - that [redacted] testified that they WERE trying to persuade women and our idea that they were just turning people away. Joel Curry in exhibit 4C says "we're trying to help you."
Doddamani, Sunita (USAMIE)
2024-08-17 18:06:00

Commented [BLK(21R20]: I think this makes sense, but maybe break it down a little more? What about something like:

Let's talk about what it means to persuade someone. Let's talk about whatiit means to convince someone. You could try to persuade a friend not to cut her hair. You could try to convince your friend not to cut her hair. But if you physically block your friend from getting into the salon, that's a unilateral decision. That's you taking away your friend's choice. Not persuading, not convincing. You're depriving your friend of the ability to choose.

Commented [BLK(22]: LOVEthis
Bernstein, Laura-Kate (CRT)
2024-08-18 12:09:00

Commented [BLK(23]: LOVE LOVEthis.
Bernstein, Laura-Kate (CRT)
2024-08-18i12:09:00

Commented [DS(24]: I know they are precluded from saying this, but in case they imply it, I've copies LK's language about this because it was so artful.
Doddamani, Sunita (USAMIE)
2024-08-17 23:07:00

Christianity ought to control. The defendants *beliefs*, what they think – no matter whether you agree or disagree with them – the defendants beliefs are not a crime. But what they *can't* do, what these defendants cannot do, is blockade the doors to a reproductive health clinic because of what they believe about abortion. *That* is why we are here today. Not because the defendants have deeply held religious beliefs. No. We are here because these defendants *acted*, and acted successfully, *based on those beliefs*. We are here because the defendants physically blocked women from accessing medical care. When the defendants *took their beliefs* and turned them in *action* – action that still haunts [redacted]; action that sent [redacted]; actions that left [redacted] crying in her shower; action that deeply wounded [redacted] – when the defendants took their beliefs and turned them into action, the defendants committed the offenses they've been charged with. And ladies and gentleman, you *can* hold them responsible for that.

Attacks on [redacted]

Let's talk about [redacted]. The defense has called her [a liar, untruthful]. They have said she's not being truthful because of the benefits she's received.

Just because she pled guilty and received a benefit for herself doesn't mean she's not truthful. Look at the evidence that corroborates what she told us.

- You saw video of [redacted] doing what the defendants did. You saw them all walking together.
- You saw the email that Cal Zastrow sent [redacted] where he talked about doing an actual rescue the second week of the tour which is exactly what week the blockade happened on.
- You heard [redacted] tell you Cal was a leader and you saw video where Cal Zastrow is hand gesturing to lead the Holiness revival team and directing others during the blockade. You saw a phone records chart that showed you he was the common thread among these defendants.

She was very candid with everyone that asked her questions. She said I don't remember when she didn't. She corrected herself when shown statements she made before that she forgot. She didn't argue with the lawyers or get defensive.

She told you she still believes abortion is wrong. She still considers herself a Christian. When she broke free and had different friends and left this group, she realized the consequences of her actions. And she had an actual change of perspective.

The whole crime is on video. She wasn't testifying to establish the facts of this crime – the video did that. She provided context for you so you could understand this world with its [culty] terms and practices:

- She defined terms: she told us what rescue meant, different kinds of rescue – red rose rescues, traditional rescues, blowfish.
- She gave us context to what they were doing and why. The same things they said on the livestream videos they made of the blockade.

Commented [DS(25]: Obviously looking for another term here - maybe "unique"?
Doddamani, Sunita (USAMIE)
2024-08-17 18:51:00

Commented [BLK(26R25]: unique jargon? distinctive? peculiar? unusual? with their distinctive terms and radical practices? particular terms and radical practices? extremist practices?
Bernstein, Laura-Kate (CRT)
2024-08-18 11:49:00

- She was 21 years old at the time of the blockade. She told you that even though she was 7 years old when her mother started taking her to abortion clinic protests, she learned how to blockade from Cal Zastrow. She learned what to say to women from Justin Philips.
- She told you that she thought Cal Zastrow was charismatic and it made her want to be more like him. She thought he was "holy" and that's what she wanted to be. She thought that if she followed him, she would get there. The way she describes it, it seems she took what he said as gospel.

[So, why you're hearing so much vitriol against her now? Why are they calling her a liar when their whole crime is on video? Maybe it's because she was a part of the group and they feel she betrayed them. Maybe because she decided to leave the group and testify against them. She's turned against them and because of this they believe she's turned against god.]

[Do you know why they are mad at [redacted]? [redacted] provides an alternative viewpoint to theirs. You know what they don't want? They don't want alternative viewpoints because they believe theirs is the only correct one. It's perfectly reasonable for someone to not agree with abortions and believe in god and change their minds about ways of changing people's minds when they have a different perspective. There is nothing wrong with changing your beliefs.]

[redacted] didn't think she was intimidating. Neither did they.

Again, this is not actually about whether they intended to intimidate people. This is about oppressing people's right to access by blocking the doors. Trying to say [redacted] thought there was nothing wrong with what she was doing has nothing to do with this.

None of these defenses hold water/Wrap Up

The defendant blocked the doors of the SH clinic because of their beliefs. They took their beliefs and agreed to try to impose those beliefs on others and take away their right to reproductive health services. Then they went out and did it. They came between women and their doctors. Workers at the clinic and their freedom to provide those services.

It's all on video. We've proven this to you beyond a reasonable doubt.

These defendants knew it was illegal and they did it anyway.

They knew the law. They discussed the law. They discussed breaking it. They organized and orchestrated breaking it. They streamed the whole thing to inspire others to break the law. And afterward, they celebrated getting arrested and accepted their friends' congratulations for breaking the law.

Commented [DS(27]: Keeping on hand just in case they really go after her.
Doddamani, Sunita (USAMIE)
2024-08-17 18:46:00

Commented [BLK(28R27]: Love this. Is there a spot to day "Maybe it's because she got out" or some other subtle this-is-a-cult language?
Bernstein, Laura-Kate (CRT)
2024-08-18 11:51:00

Commented [DS(29]: Same.
Doddamani, Sunita (USAMIE)
2024-08-17 22:41:00

Commented [BLK(30R29]: I love this. You could also draw on [redacted] testimony about when she started believing that her beliefs superseded the law, etc.

They are mad because [redacted] got out. [redacted] testified that she's been deeply involved in pro-life protest for essentially her whole life. But it was only after meeting these defendants that she came to belief her beliefs superseded the law. It was only after meeting these defendants that she came to believe that she should violate the law, whatever the cost. It was only after she met Cal Zastrow - charismatic, confident Cal Zastrow. The man who seemed to know it all. The man who taught [redacted] a different version of how to be "holy." [redacted] testified that while she was deeply involved with this group, she felt like she was Cal Zastrow's disciple.

[redacted] also testified that getting indicted, federally indicted, was the best thing that happened to her. Why? Because it forced her to separate from these people. It gave [redacted] an opportunity to speak with people who cared about her, to do some independent thinking. And when [redacted] started thinking for herself again, she realized that what she'd done was wrong. And she wanted to do what she could to make it right, including by cooperating in this prosecution.

Commented [BLK(31]: I find this a little confusing. I'm brainstorming if there's a clearer way?

Again, this is not actually whether they thought they were intimidating. You are being asked to determine whether they entered an agreement to oppress or intimidate patients and employees from freely exercising their rights. What did they agree to do? They agreed to prevent patients from getting into that clinic. Whether or not they subjectively thought they

They knew they could end up right here in federal court. And now, sitting here, they are essentially asking you to do the same thing they asked the police in Sterling Heights to do: **ignore your oath. Ignore the law.**

If they can get you to do that and find them not guilty, they can get you to pass judgement on the law and not on them.

- But, you took an oath to follow the law. At the start of this case you raised your right hands and agreed to follow the law. To put aside any personal beliefs you have. To decide the facts and apply them to the law. It's that oath that they hope you ignore.
    - But like the SH police officers, [who may have even agreed with them] – the police still had to do what they are sworn to do – uphold the law.

You took a similar oath at the beginning of this trial – we're asking you to follow it. Find them Guilty.

Commented [BLK(32]: Another way to frame it?

You took an oath at the beginning of this trial, to XYZ. Just like the SHPD took an oath to faithfully enforce the law. The defendants wanted SHPD officers to violate their oath just like they want you to violate your oath. They want you to defy the law just like they wanted SHPD to defy the law. Fact is, we live in a democracy governed by the rule of law. These defendants are not above the rule of law.
Bernstein, Laura-Kate (CRT)
2024-08-18 12:00:00

Commented [DS(33]: If they argue this.
Doddamani, Sunita (USAMIE)
2024-08-17 19:13:00

EXHIBIT 131

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Fitzgerald, Paige (CRT)" <[redacted]>
Subject: RE: GJ_memo_FACE_Philadelphia_assault_SB_SP (002)(2)
Date: Fri, 19 Nov 2021 18:09:46 -0500
Importance: Normal

Thanks, Paige.
Have a great weekend.

From: Fitzgerald, Paige (CRT)
Sent: Friday, November 19, 2021 6:02 PM
To: Patel, Sanjay (CRT) <[redacted]>; Beer, Sheldon (CRT) <[redacted]>
Subject: RE: GJ_memo_FACE_Philadelphia_assault_SB_SP (002)(2)

Thanks, Sanjay. This is approved to be put in final for Robert.

From: Patel, Sanjay (CRT)
Sent: Friday, November 19, 2021 7:50 AM
To: Fitzgerald, Paige (CRT) <[redacted]>; Beer, Sheldon (CRT) <[redacted]>
Subject: RE: GJ_memo_FACE_Philadelphia_assault_SB_SP (002)(2)

Revised memo with PF edits

From: Fitzgerald, Paige (CRT)
Sent: Thursday, November 18, 2021 4:12 PM
To: Patel, Sanjay (CRT) <[redacted]>; Beer, Sheldon (CRT) <[redacted]>
Subject: RE: GJ_memo_FACE_Philadelphia_assault_SB_SP (002)(2)

Thanks, Sanjay. That's a good clear shove and doesn't look mutually aggressive at all – I'm comfortable proceeding.

From: Patel, Sanjay (CRT)
Sent: Thursday, November 18, 2021 4:05 PM
To: Fitzgerald, Paige (CRT) <[redacted]>; Beer, Sheldon (CRT) <[redacted]>
Subject: RE: GJ_memo_FACE_Philadelphia_assault_SB_SP (002)(2)

Thanks, Paige.
I'll work on breaking those habits.
Appreciate the micro-edits.
Attached is the video.

From: Fitzgerald, Paige (CRT)
Sent: Thursday, November 18, 2021 2:20 PM
To: Beer, Sheldon (CRT) <[redacted]>
Cc: Patel, Sanjay (CRT) <[redacted]>
Subject: RE: GJ_memo_FACE_Philadelphia_assault_SB_SP (002)(2)

Hi, Shelly and Sanjay –

Attached are my edits and comments. On substance, my concern is about what the video actually shows re: the victim's actions immediately preceding the assault and whether a reasonable person might conclude that the two men were both becoming physically aggressive as the victim stepped toward the subject. I'd like to see the video. Second, even if the video is clear on that point, we need to candidly acknowledge that the victim significantly underplayed his own conduct immediately preceding the assault, and we will have to deal with that if this gets indicted and goes to trial. It may be perfectly understandable – he may have been rattled and was simply confused, but he will need to be able to explain why his account is so different from the video.

Re: writing, I did a micro-edit on this memo [redacted]

[redacted]

My intent here is not to nit-pick, but to help you elevate your written work, which will serve you across the board, including in court filings.

Thanks,
Paige

From: Beer, Sheldon (CRT)
Sent: Monday, November 15, 2021 10:08 PM
To: Fitzgerald, Paige (CRT) <[redacted]>
Cc: Patel, Sanjay (CRT) <[redacted]>
Subject: GJ_memo_FACE_Philadelphia_assault_SB_SP (002)(2)

Hi Paige,

Attached you will find a short GJ memo for a matter involving a FACE Act violation in EDPA. Please let us know if you have any questions.

Thank you,

Shelly

EXHIBIT 132

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Beer, Sheldon (CRT)" <[redacted]>
Subject: FW: : PPSP Security Incident Philadelphia
Date: Mon, 18 Oct 2021 08:29:04 -0400
Importance: Normal
Attachments: IMG_20211013_130812533.jpg; IMG_20211013_130807386.jpg
Inline-Images: image001.png

Shelly–
Looks like a good felony FACE matter.
I'm going to open it and assign it to myself for now.
SP

From: [redacted] <[redacted]>
Sent: Saturday, October 16, 2021 5:50 PM
To: Eve, Anita (USAPAE) <[redacted]>; Gibson, Eric (USAPAE) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Subject: : PPSP Security Incident Philadelphia

[redacted]
Special Agent
Federal Bureau of Investigation
Philadelphia Division

From: [redacted] <[redacted]>
Sent: Friday, October 15, 2021 2:46:51 PM
To: Jackson, Christopher (PH) (FBI)<[redacted]>
Subject: [EXTERNAL EMAIL] - PPSP Security Incident

Good afternoon,

I am reaching out to see if you can provide Planned Parenthood with assistance with a recent security incident.

On 10/13/2021, Volunteer Escort [redacted] was physically pushed down by protestor Mark Houck at PP [redacted] located at [redacted], Philadelphia (video attached). Please see below statement from him. [redacted] is following up with local police but was told he needs to file a private criminal complaint and no arrest was made on scene nor a warrant was initiated.

[redacted], this is for a private criminal complaint.

Injury suffered from incident:

- A bleeding and scraped up arm, which should heal fine.
- A problem with the palm of hand/thumb which will likely keep [redacted] from certain physical activities for a number of weeks at least.
- An ache in his right hip.

The objective of this would be to obtain an injunction similar to the following case law. Thank you in advance for your assistance.

Thank you,

[redacted], M.S.C.J, LPC
Senior Director of Security
He/Him/His

Planned Parenthood
Care. No matter what.

[redacted]

On Wed, Oct 13, 2021 at 5:26 PM [redacted] wrote:

> HI -
> First of all, [redacted], as you asked in your other note, I will be going back downtown to press charges.
> Attached are photos of the injury to my arm, as well as the complaint number info given to me by Civil Affairs officer [redacted], who took my statement.
> Also note that I have a bruise and swelling on the palm of my hand from this incident.
>
> Also note that when I finally left about 2:45, Civil Affairs was across [redacted] talking to the assailant, Mark Houck.
>
> My statement:
>
> BTW, in all this, Mark was accompanied by his young son.
> Mark Houck (known provocateur) was following two women down the street and across [redacted]. I followed to let them know they could ask him to leave them alone if they wanted to.
> Mark told me to get out of the way (I wasn't in the way) and pushed my arm around. No injury from that. And that would have been out of camera range.
> I came back to the gate, talked to [redacted] a bit, and went back to near the [redacted] where Mark was. I'm guessing I was maybe 8 feet away from him.
> I go there because at the corner he attempts to confuse women who are looking to come into the clinic, and he tries to get them to go to their "clinic" across the street, thinking they are going to Planned Parenthood.
> He told me he didn't want me that close to him and his son. I told him it was a public street. He threatened to push me into the street. I asked him "is that a threat?", and he said "yes".
> I turned my back from him, and perhaps was walking a little back to towards the gate, I'm not sure.
> He then pushed me hard in the back and I fell to the ground, badly scraping my right arm below the elbow, which was bleeding.
> Also later realized that my palm was bruised and somewhat swollen, as I had braced myself with the hand I guess.
>
> This was witnessed by [redacted], two passers by for whom we have their info. Went in, and asked the guard to call Civil Affairs, which he did, and he also called[redacted]

Civil Affairs told me that we needed to call 911i. Not sure if that happened, but eventually Civil Affairs came out. One of the officers was [redacted] I believe. He took some info, but said it was a matter for the regular police and he would have them come out.
Civil Affairs then went back to their car. Over the next maybe half hour I went back to their car a couple times to ask when the uniforms might come. They didn't know.
A bit after the second time, Civil Affairs Officer [redacted] cam to me and said she could take the info, which she did. She was very helpful.
She told me I would need to go to the District ([redacted]) tomorrow when they'd have the info she took, if I wanted to file, and gave me the piece of paper With the DC# (photo attached).
Before this, by the way, the guard asked me to look at the footage on video with him, while he was on the phone with a tech person.
Eventually we located the incident at 12:51 PM, showing very clearly Mark pushing me down. The guard had difficulty saving the footage, but I assume that eventually happened.

That's about it. If there's anything else you need please let me know. And Once I've done the complaint of Thursday, I'll be in touch again.

EXHIBIT 133

From: "Fitzgerald, Paige (CRT)" <[redacted]>
To: "Beer, Sheldon (CRT)" <[redacted]>
Cc: "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: GJ_memo_FACE_Philadelphia_assault_SB_SP (002)(2)
Date: Thu, 18 Nov 2021 14:19:57 -0500
Importance: Normal
Attachments: GJ_memo_FACE_Philadelphia_assault_SB_SPi (002)(2)i pf.docx

---

Hi, Shelly and Sanjay –

Attached are my edits and comments. On substance, my concern is about what the video actually shows re: the victim's actions immediately preceding the assault and whether a reasonable person might conclude that the two men were both becoming physically aggressive as the victim stepped toward the subject. I'd like to see the video. Second, even if the video is clear on that point, we need to candidly acknowledge that the victim significantly underplayed his own conduct immediately preceding the assault, and we will have to deal with that if this gets indicted and goes to trial. It may be perfectly understandable – he may have been rattled and was simply confused, but he will need to be able to explain why his account is so different from the video.

Re: writing, [redacted]

My intent here is not to nit-pick, but to help you elevate your written work, which will serve you across the board, including in court filings.

Thanks,
Paige

From: Beer, Sheldon (CRT)
Sent: Monday, November 15, 2021 10:08 PM
To: Fitzgerald, Paige (CRT) <[redacted]>
Cc: Patel, Sanjay (CRT) <[redacted]>
Subject: GJ_memo_FACE_Philadelphia_assault_SB_SP (002)(2)

Hi Paige,

Attached you will find a short GJ memo for a matter involving a FACE Act violation in EDPA. Please let us know if you have any questions.

Thank you,

Shelly

EXHIBIT 134

From: "Beer, Sheldon (CRT)" <[redacted]>
To: "Fitzgerald, Paige (CRT)" <[redacted]>
Cc: "Patel, Sanjay (CRT)" <[redacted]>
Subject: Indictment_memo_FACE_Philadelphia_assault_v6_clean (002)
Date: Wed, 10 Aug 2022 09:29:25 -0400
Importance: Normal
Attachments: Indictment_memo_FACE_Philadelphia_assault_v6_clean_(002).docx

---

Hi Paige,

I was hoping to be able to chat with you about this yesterday, but we ran out of time during our call.

I am sending you an updated Indictment memo from Sanjay on a FACE case out WDPA. This is a matter you previously reviewed and had questions about, mostly concerning the government's ability to prove that the subject acted because the victim was engaged in reproductive health services. Sanjay has worked to answer your questions, to gather additional evidence, and to provide a more substantive analysis of the case.

As you will see, the litigation risks you identified are still present, although mitigated by the additional investigation done by Sanjay and his team. The USAO really wants to proceed in this matter, and the FBI is on board. Weighing all the equities, I support Sanjay's request to proceed to indictment, knowing that this is a challenging case.

We are happy to discuss – please let us know your thoughts.

Shelly

* For efficiency, I asked Sanjay to incorporate the comment bubbles into this draft so you can track the answers to the questions without having to read through all the red-line.

EXHIBIT 135

From: "Fitzgerald, Paige (CRT)" <[redacted]>
To: "Beer, Sheldon (CRT)" <[redacted]>
Cc: "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: Indictment_memo_FACE_Philadelphia_assault_v6_clean (002)
Date: Thu, 18 Aug 2022 12:48:10 -0400
Importance: Normal

I will approve charges because of the evidence of the earlier push on the same day and the prior incident. There were some places in the updated memo where the language suggests that we need only prove that an alternative motivation was not the sole motivation, and I want to stress that is not accurate. Rather, we must prove that the assault would not have occurred were it not for the fact that the victim was an escort, and I still think that is a very, very difficult case, especially with the likely defense that Houck gets violent only when someone threatens his person/family/property as demonstrated by the assault on the person who knocked down his sandwich board.

I'd like to see the indictment. Is the plan to charge both of the October assaults, but use the May incident as 404(b)?

From: Beer, Sheldon (CRT) <[redacted]>
Sent: Wednesday, August 10, 2022 9:29 AM
To: Fitzgerald, Paige (CRT) <[redacted]>
Cc: Patel, Sanjay (CRT) <[redacted]>
Subject: Indictment_memo_FACE_Philadelphia_assault_v6_clean (002)

Hi Paige,

I was hoping to be able to chat with you about this yesterday, but we ran out of time during our call.

I am sending you an updated Indictment memo from Sanjay on a FACE case out WDPA. This is a matter you previously reviewed and had questions about, mostly concerning the government's ability to prove that the subject acted because the victim was engaged in reproductive health services. Sanjay has worked to answer your questions, to gather additional evidence, and to provide a more substantive analysis of the case.

As you will see, the litigation risks you identified are still present, although mitigated by the additional investigation done by Sanjay and his team. The USAO really wants to proceed in this matter, and the FBI is on board. Weighing all the equities, I support Sanjay's request to proceed to indictment, knowing that this is a challenging case.

We are happy to discuss – please let us know your thoughts.

Shelly

* For efficiency, I asked Sanjay to incorporate the comment bubbles into this draft so you can track the answers to the questions without having to read through all the red-line.

EXHIBIT 136

From: "[redacted]" <[redacted]>
To: "Eve, Anita (USAPAE)" <[redacted]>
Subject: Re: CRT pros memo - Houck
Date: Wed, 31 Aug 2022 08:00:13 -0400
Importance: Normal

Yes.

Sent from my iPhone

On Aug 31, 2022, at 6:51 AM, Eve, Anita (USAPAE) <[redacted]> wrote:

Will the Houck case be the first post-Dobbs FACE indictment?

From: Gibson, Eric (USAPAE) <[redacted]>
Sent: Tuesday, August 30, 2022 9:41 AM
To: Eve, Anita (USAPAE) <[redacted]>
Subject: RE: CRT pros memo - Houck

Good morning.

Do you happen to know whether this might be the first FACE indictment since Dobbs?

From: Eve, Anita (USAPAE) <[redacted]>
Sent: Monday, August 29, 2022 10:33 AM
To: Gibson, Eric (USAPAE) <[redacted]>
Subject: RE: CRT pros memo - Houck

Hi Eric. We agreed to move forward and Sanjay is going to draft an indictment and send it and the final pros memo to me. We plan to present the case to the grand jury on 9/20.

Anita

From: Gibson, Eric (USAPAE) <[redacted]>
Sent: Monday, August 29, 2022 10:13 AM
To: Eve, Anita (USAPAE) <[redacted]>
Subject: RE: CRT pros memo - Houck

Hello, Anita.

Hope you are well.

I ham back from vacation and just checking in . . . How did your discussion go?

E

From: Eve, Anita (USAPAE) [redacted]
Sent: Friday, August 19, 2022 1:30 PM
To: Gibson, Eric (USAPAE) [redacted]
Subject: FW: CRT pros memo - Houck

Eric, this is the memo that I received from CRT yesterday. We have a plan to discuss one day next week.

Anita Eve

From: Patel, Sanjay (CRT) [redacted]
Sent: Thursday, August 18, 2022 2:18 PM
To: Eve, Anita (USAPAE) [redacted]
Subject: CRT pros memo - Houck

See attached.
My shop thinks this will be an extremely challenging case bc of the motivation evidence.
Happy to discuss if you have any questions.
SP

EXHIBIT 137

From: "Gibson, Eric (USAPAE)" <[redacted]>
To: "Eve, Anita (USAPAE)" <[redacted]>
Cc: "Patel, Sanjay (CRT)" <[redacted]>
Subject: Re: meeting on Monday
Date: Fri, 16 Sep 2022 19:49:54 -0400
Importance: Normal
Attachments: Houck_press_release.doc

Thank you.

My thought on the release more had to do with the immediate ease and speed of on-line trollers identifying you and Sanjay.

I do expect the Thomas Moore Society lawyers to be particularly . . . Unpleasant.

Sent from my iPhone

On Sep 16, 2022, at 7:43 PM, Eve, Anita (USAPAE) <[redacted]> wrote:

Sorry for this late entry into the conversation. Eric, Sanjay and I have already met with [redacted] and his attorney, [redacted], on a number of occasions. The [redacted] family is prominent in the local pro-life community and the [redacted] family were subjects in the abortion clinic case that you and I were involved in years ago. When the target letter was served on Houck, I was contacted by Mark Heffron of the Thomas More Society, who I think tried to intimidate me. It didn't work. So Sanjay's name and mine are already known to the local pro-life community and I have no problem with our names being included in the press release. I defer to Sanjay on that.

Earlier today, I forwarded the attached press release to Jennifer Crandall and told her that she may want to coordinate with the FBI and CRT.

Anita

From: Gibson, Eric (USAPAE) <[redacted]>
Sent: Friday, September 16, 2022 6:52 PM
To: Patel, Sanjay (CRT) <[redacted]>; Eve, Anita (USAPAE) <[redacted]>
Subject: RE: meeting on Monday

Given where we are on the calendar and the current public discussion, I offer that for consideration. Obviously, there will be court appearances and the like to follow. Here, in the past, however, where there have been some concerns about attracting reactions from an extremist element, there are steps we have taken to minimize exposure and enhance security if needed. If that is a discussion we need to have, we should have it.

It has occurred to me both because this is the first post-Dobbs indictment and all the controversy that has ensued, particularly locally (PA), that we should be thoughtful and prudent as it relates to the prosecution team.

I am quite certain the team is tough, but I would like you all to feel supported and secure.

For example, I do expect our reception folks to be subjected to some unpleasant nonsense answering our phones or clearing out the voicemail.

I hope I am wrong. But I would like us all to be prepared.

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Friday, September 16, 2022 6:16 PM
To: Gibson, Eric (USAPAE) <[redacted]>; Eve, Anita (USAPAE) <[redacted]>
Subject: RE: meeting on Monday

I'll connect Jennifer with Aryele and Kendall so they can share whatever latest version is being circulated.

I've been named in other FACE press releases, so I don't have any concerns.
But happy to keep our names out.
I'll defer to you all to make that call.

From: Gibson, Eric (USAPAE) <[redacted]>
Sent: Friday, September 16, 2022 5:59 PM
To: Patel, Sanjay (CRT) <[redacted]>; Eve, Anita (USAPAE) <[redacted]>
Subject: RE: meeting on Monday

Is there a draft?

Ours is Jennifer Crandall ([redacted]?)

Do either of you have heartburn about being named in the release? My inclination would be to leave the prosecutors' names off of the release so as to minimize your exposure to vitriol.

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Friday, September 16, 2022 5:54 PM
To: Gibson, Eric (USAPAE) <[redacted]>; Eve, Anita (USAPAE) <[redacted]>
Subject: RE: meeting on Monday

I know my shop is planning to issue a release once the indictment is unsealed.
My PAO contacts are:
[redacted]

From: Gibson, Eric (USAPAE) <[redacted]>
Sent: Friday, September 16, 2022 5:49 PM
To: Patel, Sanjay (CRT) <[redacted]>; Eve, Anita (USAPAE) <[redacted]>
Subject: RE: meeting on Monday

Does the Criminal Section have thoughts on a press plan for after the arrest?

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Friday, September 16, 2022 5:30 PM
To: Gibson, Eric (USAPAE) <[redacted]>; Eve, Anita (USAPAE) <[redacted]>

Cc: [redacted] (PH) (FBI)<[redacted]>
Subject: RE: meeting on Monday

Thanks, Eric.
Happy to stop by whenever it's convenient for your team.
We are prepping Monday, most likely virtually.
Maybe Tuesday morning after indictment?

Best,
SP

From: Gibson, Eric (USAPAE) <[redacted]>
Sent: Friday, September 16, 2022 5:26 PM
To: Patel, Sanjay (CRT)<[redacted]>; Eve, Anita (USAPAE) <[redacted]>
Cc: [redacted] (PH) (FBI)<[redacted]>
Subject: meeting on Monday

Sanjay,

Hope all is well.

I understand your coming to town Monday and the team is set for a discussion ahead of Tuesday's gj.

Our Criminal Chief would like to introduce himself to you while you are in town and also make an introduction to our FAUSA (a CRT Criminal Section alum himself).

Please let me know when you plan to arrive.

Also, my understanding is that we plan to seal the indictment and arrest Houck following indictment. Let me know if there is additional discussion needed on that point.

Thanks and have a good weekend.

Eric L. Gibson
Assistant United States Attorney
Deputy Chief, Corruption and Civil Rights Unit
Civil Rights Coordinator
Eastern District of Pennsylvania
[redacted]
Tel. [redacted]

EXHIBIT 138

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Martin, Ashley (USAPAE)" <[redacted]>
Subject: RE: I'm assuming you know this case?
Date: Sat, 21 Jan 2023 00:49:03 -0500
Importance: Normal

It gets better.
Thomas moore society is quite the racket.
https://thomasmoresociety.org/highlight-cases/mark-houck/

From: Martin, Ashley (USAPAE) <[redacted]>
Sent: Friday, January 20, 2023 11:40 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: RE: I'm assuming you know this case?

I figured as much

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Friday, January 20, 2023 11:37 PM
To: Martin, Ashley (USAPAE) <[redacted]>
Subject: RE: I'm assuming you know this case?

Yep.
The Allentown v. Sulpizio case is easily distinguishable from ours.

From: Martin, Ashley (USAPAE) <[redacted]>
Sent: Friday, January 20, 2023 11:35 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: I'm assuming you know this case?

Breen mentions some 2019 case around 8:43 -- https://www.youtube.com/watch?v=HdefqDxtfII

I won't even try to spell it

Ashley N. Martin
Assistant United States Attorney
U.S. Attorney's Office, Eastern District of Pennsylvania
[redacted]
Office: [redacted]
Cell: [redacted]

EXHIBIT 139

From: "Eve, Anita (USAPAE)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>, "[redacted] (PH) (FBI)" <[redacted]>
Subject: FW: [EXTERNAL] Target letter sent to Mr. Mark Houck
Date: Thu, 09 Jun 2022 12:36:33 -0400
Importance: Normal
Inline-Images: image001.png

I am sharing this email that I received from Houck's attorney. This attorney is different from the one I previously spoke to; that attorney did tell me that I would be hearing from someone else.

Anita Eve
Assistant U.S. Attorney
Capitol Riots Detailee
U.S. Attorney's Office
[redacted]
Telephone No.: [redacted]
Cellular Telephone No.: [redacted]
Fax No.: [redacted]
Email: [redacted]

From: Matt Heffron <[redacted]@thomasmoresociety.org>
Sent: Thursday, June 9, 2022 12:15 PM
To: Eve, Anita (USAPAE) <[redacted]>
Cc: jpw0077@gmail.com
Subject: [EXTERNAL] Target letter sent to Mr. Mark Houck

AUSA Eve:

As you know from my telephone messages to you on May 21 and June 7, I am one of the attorneys representing Mark Houck, together with Pennsylvaoia attorney John Williamson.

I understaud you have just returned from being out of the office for 10 days and are probably very busy. (I used to be in charge of one of the criminal divisions of the Phoenix USAO, and I remember the madness after returning from any break.) On the other hand, since you sent my client a target letter, I think it is necessary for me to make contact with you.

I assume you are contemplating a FACE action. You probably are familiar with the *Sulpizio* case from your district court, but it is possible it has not yet come to your attention. Just 2 ½ years ago, your district considered nearly identical facts to those of the Houck/[redacted] incident and ruled no violation of FACE had occurred. I have set out the operative language below, adding emphasis to some of the remarkably similar facts and to the reasoning for the holding.

> Plaintiff contends that Sulpizio's actions in April 2017 where 'Sulpizio physically pushed an AWC volunteer escort away from the car window of a person attempting to enter the AWC Clinic ... easily satisfies] [the] burden to show a reasonable probability that Sulpizio's actions were 'force' within the meaning of the FACE Act.' ...
>
> At the Preliminary Injunction Hearing, as described above, Plaintiff introduced into evidence the video of this incident from April 15, 2017. [One of two such contact incidents.] Sulpizio did not 'come up to an escort volunteering at the Center' prior to making contact, as in *Cain*, but, instead, Escort Stiles walked down the driveway, approached the car, and confronted Sulpizio at the car. This then positioned Escort Stiles and Sulpizio literally nose to nose with each other with neither of them backing off. Certainly, it created a mutually volatile situation in which one of them or someone else could have gotten hurt. The Court observed on film an instance where both parties, Escort Stiles and Sulpizio, were equally responsible for being in each other's face, neither backing off, and the contact was a consequence of this mutually close and brief encounter. At all times, Defendant Sulpizio was postured in the public right of way and never crossed the line into the private area. ...
>
> Furthermore, even if the Court were to find that Sulpizio engaged in "force" against Escort Stiles, the **video shows that Sulpizio did not use force *because* Escort Stiles was providing reproductive health services, but instead used force in connection with a mutual argument** over Sulpizio's positioning and the time he was spending exercising what he believed to be his Constitutional rights. Therefore, the **Court does not find that Plaintiff has shown a reasonable probability of eventual success in proving that Defendant Sulpizio violated FACE** by using force to intentionally injure or intimidate or attempt to injure or intimidate a person because that person is providing reproductive health services.

Allentown Women's Ctr., Inc. v. Sulpizio, 403 F. Supp. 3d 461, 468 (E.D. Pa. 2019)

In addition, there are a fair number of cases that hold FACE requires a defendant not merely to intend the physical act, but rather to act with the specific intent to interfere with "reproductive health services." That did not occur under the facts of Houck/[redacted] incident.

At the Thomas More Society, several of us have successfully defended FACE cases, both criminal and civil. We are willing to do so for Mr. Houck as well. The unnecessary use of judicial resources, though, particularly under these circumstances, makes this case one that should not go forward, in my opinion. If the government decides to go forward nonetheless, I will accept a summons on my client's behalf, rather put Mr. Houck and his family through needless disruption.

Thank you in advance for your courtesy. I look forward to hearing from you.

Matt Heffron
THOMAS MORE SOCIETY
[redacted]
main, Chicago
direct

EXHIBIT 140

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Eve, Anita (USAPAE)" <[redacted]>
Subject: RE: Houck - arrest or surrender?
Date: Sat, 17 Sep 2022 14:17:38 -0400
Importance: Normal

I think FBI plans on an arrest.
If so, then indictment should be sealed and no PR until unsealing, right?

From: Eve, Anita (USAPAE) <[redacted]>
Sent: Friday, September 16, 2022 8:02 PM
To: Patel, Sanjay (CRT)" <[redacted]>
Subject: Houck - arrest or surrender?

EXHIBIT 141

From: [redacted]
To: [redacted]
Subject: RE: Houck indictment
Date: Tue, 20 Sep 2022 14:34:25 -0400
Importance: Normal

Yes we will be attempting tomorrow

From: Eve, Anita (USAPAE) [redacted]
Sent: Tuesday, September 20, 2022 2:27 PM
To: Patel, Sanjay (CRT) [redacted]; [redacted] (PH) (FBI) [redacted]; Barrett, Richard (USAPAE) [redacted]; Gibson, Eric (USAPAE) [redacted]
Subject: [EXTERNAL EMAIL] - Houck indictment

Assuming Houck is arrested tomorrow, his magistrate hearing will be via Zoom at noon. I need to inform the Court whether we actually intend to attempt the arrest tomorrow ASAP.
Anita

EXHIBIT 142

From: [redacted]
To: [redacted]
Subject: Re: Protective Detail
Date: Thu, 22 Sep 2022 15:56:36 -0400
Importance: Normal

Yes, we will attempt in the morning

[redacted]
Special Agent
Federal Bureau of Investigation
Philadelphia Division

From: Eve, Anita (USAPAE) [redacted]
Sent: Thursday, September 22, 2022 3:46:47 PM
To: [redacted] (PH) (FBI)"[redacted]; Patel, Sanjay (CRT) [redacted]
Subject: [EXTERNAL EMAIL] - RE: Protective Detail

Just checking, is there a plan in place to arrest Houck tomorrow morning?

From: [redacted]
Sent: Thursday, September 22, 2022 3:21 PM
To: Patel, Sanjay (CRT)"[redacted]; Eve, Anita (USAPAE) [redacted]
Subject: Protective Detail

Hey,

Just FYI my contact in Marshals protective service is apprised of the situation if anything arises post unseal. They have your names but won't proceed with anything unless you feel it necessary.

Anita, when will the judge's chambers send out the link for initial appearance?

[redacted]
Special Agent
Federal Bureau of Investigation
Philadelphia Division

EXHIBIT 143

From: "Sooknanan, Sparkle (OASG)" <[redacted]>
To: "Folk, Anders (ODAG)" <[redacted]>
Cc: "Moossy, Robert (CRT)" <[redacted]>, "Gaston, Molly (ODAG)" <[redacted]>, "Visser, Tim (OAG)" <[redacted]>, "Clarke, Kristen (CRT)" <[redacted]>, "Weiner, Robert (CRT)" <[redacted]>
Subject: Re: Houck arrest
Date: Tue, 27 Sep 2022 16:50:40 -0400
Importance: Normal

Yes, many thanks to you and the team.

On Sep 27, 2022, at 4:26 PM, Folk, Anders (ODAG) <[redacted]> wrote:

Thanks Robert.

From: Moossy, Robert (CRT) <[redacted]>
Sent: Tuesday, September 27, 2022 4:24 PM
To: Sooknanan, Sparkle (OASG) <[redacted]>; Folk, Anders (ODAG) <[redacted]>; Gaston, Molly (ODAG) <[redacted]>; Visser, Tim (OAG) <[redacted]>
Cc: Clarke, Kristen (CRT) <[redacted]>; Weiner, Robert (CRT) <[redacted]>
Subject: Houck arrest

Hi team, several have asked me what we know about the FBI's arrest of Houck in this FACE case. Below are some bullets prepared by CrimSec on the matter, and attached is the FBI 302 of the arrest.

Talkers: Letters to AG re: EDPA FACE indictment (Δ Mark Houck)

- Δ Houck was charged with two counts of violating the FACE Act (not one)
  - Δ committed two assaults against the victim on 10/13/21. The assaults were separated by a short amount of time. Δ initially pushed the victim to the ground as he attempted to escort two clinic patients. A short time later, Δ forcefully shoved the victim to the ground as the two men stood close to one another near the clinic's entrance.
  - Count 1 charges Δ with a misdemeanor FACE Act offense for the initial push, which did not result in bodily injury.
  - Count 2 charges Δ with a felony violation for the subsequent assault, which resulted in bodily injury
- Δ Houck was charged by private criminal complaint filed by the victim after local police failed to charge Δ for assaulting the victim. The private criminal complaint case was dismissed without prejudice by local authorities in lieu of the then on-going federal investigation. Federal and local authorities were in regular contact (up until yesterday 9/26/22) about the status of the federal prosecution.
- The indictment was filed under seal, and a judge issued an arrest warrant for Δ Houck that was executed by the FBI on 9/23/22.
- The FBI did not execute a search warrant, and did not enter Δ's residence.
- According to the FBI, who developed and implemented the arrest plan on its own, approximately 16 law enforcement officers executed the arrest warrant (not 20-25). Officers knocked on Δ Houck's residence door, and arrested him after he complied with orders to step outside of his residence. Officers did not enter Δ's home, and

allowed him to dress appropriately (change his clothing and shoes) before transporting him to the FBI field office. At no time were firearms pointed at Δ's wife or his children. The arrest was amicable, although Δ's wife demanded to see the warrant (which was shown to her although not immediately). Δ apologized to the officers for the actions of his wife thanked and expressed his appreciation for them not entering his home or frightening his family and for providing him the courtesy of allowing him to exit the residence.

EXHIBIT 144

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "[redacted]" <[redacted]>, "Eve, Anita (USAPAE)" <[redacted]>
Subject: RE: HOUCK in custody
Date: Fri, 23 Sep 2022 07:34:19 -0400
Importance: Normal

Excellent.
Thanks for the update[redacted].

From: [redacted] <[redacted]>
Sent: Friday, September 23, 2022 7:21 AM
To: Eve, Anita (USAPAE) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Subject: HOUCK in custody

Houck is in custody and we are headed to FBI space

[redacted]
Special Agent
Federal Bureau of Investigation
Philadelphia Division

EXHIBIT 145

From: "Patel, Sanjayt(CRT)" <[redacted]>
To: "Felte, James (CRT)" <[redacted]>
Cc: "Fitzgerald, Paige (CRT)" <[redacted]>
Subject: RE: FACE Meetings
Date: Mon, 17 Oct 2022 11:18:24 -0400
Importance: Normal

Hi,'Jim"–
I responded to each question below.
Happy to provide more details if needed.
SP

From: Felte, James (CRT)"<[redacted]>
Sent: Monday, October 17, 2022 11:06 AM
To: Patel,"Sanjay'(CRT)<[redacted]>
Cc: Fitzgerald, Paige (CRT) <[redacted]>
Subject: FACE Meetings

Sanjay,

Robert will be meeting with the DAG to discuss numerous topics this afternoon. One of the topics will be FACE. A few questions:

1) Are you aware of any other allegations (other than Houck) of the Department or FBI being overbearing? **Yes re: MDTN FACE – allegations are that FBI raided the homes of two defendants (of 11), and that FBI pulled guns on one of them. Tucker Carlson had a couple of segments on this. Here's one of them:**
Pro-life father details jarring arrest in front of children - YouTube

2) I know you met with the USCCB last week, have we had any more follow-up communications or are there any other meetings or calls scheduled? **No follow-up meetings scheduled. FBI is waiting for us to approve/edit their message that USCCB will broadcast to affiliated pregnancy centers. I fwd'd that to you and Paige last week. USCCB will also remain in contact with FBI to share/assist with outreach.**

3) Have you received any allegations of criminal conduct involving abortion alternative facilities since the meetings with the umbrella groups with the past couple of weeks? **No new reports. But glad to report that we are actively working with NSD and MDFL USAO on three separate Jane's incidents involving a common subject. We're getting warrants and shoring up some evidence in hopes of bringing charges soon.**

4) When would be a reasonable time by which we can make our anticipated changes to the resource booklet knowing that we need to both make the changes and to message these changes with appropriate groups? **I'm going to work on the booklet this week and send to Paige for review by Friday. Once it's approved, I will send along for 508 compliance, which could take a couple of weeks. CareNet has shared their suggestions/ inclusions with me.**

Thanks,

Jim

EXHIBIT 146

From: "Patel, Sanjay (CRT)"i<[redacted]>
To: "Felte, James (CRT)"i<[redacted]>
Cc: "Siscaretti, Christine (CRT)" <[redacted]>, "Beer, Sheldon (CRT)" <[redacted]>, "Fitzgerald, Paige (CRT)" <[redacted]>
Subject: RE: DOJ response to Sen Grassley's letter FBI/USAO Response needed
Date: Tue, 18 Oct 2022 17:45:14 -0400
Importance: Normal

The Roy-Lee letter mostly asks for stats and policy/practice stuff in addition to the q's about FACE applying to houses of worship, so I didn't respond to those qs.
Here are my responses to the questions raised in the Grassley letter.

Grassley:

1. Why did the Justice Department wait 11 months after the October 2021 incident to indict Mr. Houck? **Our investigation commenced two days after the incident. The investigation was on-going throughout that time up to the day defendant was indicted.**
2. Please provide a list of Justice Department and FBI officials who approved the decision to open a grand jury investigation into Mr. Houck after the state criminal complaint had already been dismissed. **The FBI investigation began two days after the incident (I have an email from the clinic to FBI dated 10-15-21). Moossy signed my grand jury auth letter on 11-23-21. During the federal investigation, we were in regular contact with local prosecutors who dismissed the state case in lieu of the on-going federal investigation. The state case against defendant Houck was dismissed sometime bw April 18-29, 2022, which was during the grand jury investigation.**
3. Please provide a list of Justice Department and FBI officials who approved the execution of the arrest warrant for Mr. Houck. **This was FBI after we (CRT and USAO) urged FBI to allow defendant to self-surrender.**
4. How many law enforcement personnel did the FBI use in executing the arrest warrant? **16 according to the arrest 302.**
5. In light of Mr. Houck's alleged cooperation with federal authorities, what factors led to the Justice Department and FBI executing an arrest warrant against him instead of using less aggressive tactics, including a summons to appear? Please explain how the execution of the search warrant complied with Attorney General Garland's use of force memorandum? **Defense counsel claims that he twice called and left AUSA Eve messages, and did not receive a return call. He also sent an email indicating defendant would voluntarily appear, and that AUSA Eve did not respond. AUSA Eve did report to me that she had conversations with an attorney representing defendant, and received emails from another. Defense counsel's initial calls were while AUSA Eve was on leave. She did subsequently return the call and have a conversation with him, which was during the on-going grand jury investigation. I believe this occurred in June 2021. I was not cc'd on any emails. As to the factors supporting the arrest warrant – standard USAO practice to get a warrant when an indictment is filed under seal. FBI standard practice to arrest in this and similar cases where defendant charged with a felony.**

Let me know if you'd like more details.
SP

From: Felte, James (CRT)[redacted]
Sent: Tuesday, October 18, 2022 5:33 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Siscaretti, Christine (CRT) <[redacted]>; Beer, Sheldon (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Subject: Re: DOJ response to Sen Grassley's letter FBI/USAO Response needed

Sanjay,

Hold off on preparing the draft. It looks like ODAG and OASG are going to do it and we'll review.

Go ahead and get answers for ODAG to the questions on the other email chain though.

Thanks,

Jim

On Oct 18, 2022, at 5:14 PM, Felte, James (CRT)[redacted] wrote:

Correct.

On Oct 18, 2022, at 5:13 PM, Patel, Sanjay (CRT) [redacted] wrote:

Will do.
I'm assuming our letter was the one you circulated yesterday, and the most recent one you sent is the FBI's?

From: Felte, James (CRT) [redacted]
Sent: Tuesday, October 18, 2022 5:13 PM
To: Patel, Sanjay (CRT) [redacted]
Cc: Siscaretti, Christine (CRT) [redacted]; Beer, Sheldon (CRT) [redacted];
Fitzgerald, Paige (CRT) [redacted]
Subject: Re: DOJ response to Sen Grassley's letter FBI/USAO Response needed

Thanks Sanjay. Can you take a stab at merging our letter with the FBI's?

Jim

On Oct 18, 2022, at 4:46 PM, Patel, Sanjay (CRT) [redacted] wrote:

FYSA

From: Calce, Christina M. (OLA) [redacted]
Sent: Tuesday, October 18, 2022 4:11 PM
To: Patel, Sanjay (CRT) [redacted]
Cc: Weiner, Robert (CRT) [redacted]; Bond, Rebecca (CRT) [redacted]; Haddad,
Soraya (OLA) [redacted]
Subject: FW: DOJ response to Sen Grassley's letter FBI/USAO Response needed

Hi Sanjay,

I don't believe we've met. I am a DAAG in OLA and have been handling the response on this one.
I think there might have been some crossed wires here. FBI drafted an initial response, which I edited and then sent to Rob Weiner & Rebecca Bond, cc'ing OASG, yesterday. We had a call yesterday afternoon and laid out next steps.

We are looking for input from you and Rob Moosey, but were hoping to have it incorporated into the placeholder section in the attached draft. OLA is separately reaching out to EOUSA to run down some additional info.

I'm happy to jump on a call to discuss further- [redacted]

Thanks,
Christina

From: [redacted]
Sent: Tuesday, October 18, 2022 3:40 PM
To: Calce, Christina M. (OLA) [redacted]
Cc: [redacted] (OCA) (FBI) [redacted]; Alexander, John B. (OLA) [redacted]; Haddad, Soraya (OLA) [redacted]
Subject: FW: DOJ response to Sen Grassley's letter FBI/USAO Response needed

Hello Christina,

The Philadelphia FO was contacted about adding language (see chain below) to the attached draft response to Grassley re: Houck. However, the draft doesn't include any language from the proposed response I sent on Friday (also attached).

Has CRT been provided with the FBI language?

Please let me know if you do need anything from FBI/Philadelphia.

Thanks,
Claire

[redacted]
Legislative Affairs Specialist
FBI | Office of Congressional Affairs
Desk: [redacted] | Mobile: [redacted]

From: [redacted] (PH) (FBI) [redacted]
Sent: Tuesday, October 18, 2022 12:43 PM
To: [redacted] (OCA) (FBI) [redacted]
Subject: FW: DOJ response to Sen Grassley's letter FBI/USAO Response needed

Hi Claire – please see the chain below and the DOJ doc attached.

Can you shed any light on the back and forth with DOJ since that 9/29 draft response you'd sent me?

Seems weird that none of the FBI statement language from that draft is included here, and DOJ is now asking for PH input.

Thanks!

[redacted]
Public Affairs Officer
FBI Philadelphia
desk - [redacted]

cell - [redacted]
@FBIPhiladelphia

From: [redacted] (PH) (FBI)
Sent: Tuesday, October 18, 2022 11:46 AM
To: [redacted] (PH) (FBI) <[redacted]>
Cc: [redacted] (PH) (FBI) <[redacted]>
Subject: RE: DOJ response to Sen Grassley's letter FBI/USAO Response needed

Hey [redacted]!

It's odd that they're asking for us to add anything now.

Late last month, FBI OCA sent me a draft Grassley response that OCA/OGC put together, which included a lot of the language from our statement about the arrest. OCA asked for PH's input; we said we were fine with it. CID was also reviewing.

It was my understanding that OCA/OGC would then be providing that draft to the DOJ folks for use in crafting the final reply.

However, this version of the letter has all the PH statement language stripped out.

I'm going to touch base with OCA and try to get some clarity on this.

(tl;dr – previous FBI input on the response letter has been stripped out and now they're asking for FBI input again. What gives?)

[redacted]
Public Affairs Officer
FBI Philadelphia
desk - [redacted]
cell - [redacted]
@FBIPhiladelphia

From: [redacted] (PH) (FBI) <[redacted]>
Sent: Tuesday, October 18, 2022 11:22 AM
To: [redacted] (PH) (FBI) <[redacted]>
Cc: [redacted] (PH) (FBI) <[redacted]>
Subject: DOJ response to Sen Grassley's letter FBI/USAO Response needed

Hey Carrie,

Attached is the DOJ response to the congressional letter inquiry into the HOUCK arrest.
DOJ would like us to draft a response to add to it before submitting.

Let me know what you need from me. Thanks, hope all is well.

[redacted]
Special Agent
Federal Bureau of Investigation
Philadelphia Division

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Tuesday, October 18, 2022, 9:43 AM
To: [redacted] (PH) (FBI) <[redacted]>; Eve, Anita (USAPAE) <[redacted]>
Subject: [EXTERNAL EMAIL] - DOJ response to Sen Grassley's letter

Anita:/ [redacted] –
Attached are a congressional letter received by DOJ, and a draft response that is being prepared by OLA. Can you have your shop review and add to the response, and send back to me for my shop's review?
Thanks,
SP

EXHIBIT 147

From: "Felte, James (CRT)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>, "Fitzgerald, Paige (CRT)" <[redacted]>
Cc: "Christian, Forrest (CRT)" <[redacted]>
Subject: RE: NashvilleArrest Plan
Date: Tue, 04 Oct 2022 13:17:59 -0400
Importance: Normal

Got it!

From: Patel, Sanjay (CRT)"<[redacted]>
Sent: Tuesday, October 4, 2022 1:17 PM
To: Fitzgerald, Paige (CRT) <[redacted]>; Felte, James (CRT)"<[redacted]>
Cc: Christian, Forrest (CRT) <[redacted]>
Subject: RE: Nashville Arrest Plan

Main reason is in hope of seizing phones for SWs (so that no one wipes them once they find out they were charged).
I think the unspoken reason is bc the FBI really likes to make arrests.

From: Fitzgerald, Paige (CRT) <[redacted]>
Sent: Tuesday, October 4, 2022 1:09 PM
To: Patel, Sanjay (CRT)"<[redacted]>; Felte, James (CRT)"<[redacted]>
Cc: Christian, Forrest (CRT) <[redacted]>
Subject: RE: Nashville Arrest Plan

Why are they arresting rather than allowing self surrender?

From: Patel, Sanjay (CRT)"<[redacted]>
Sent: Tuesday, October 4, 2022 1:01 PM
To: Felte, James (CRT)"<[redacted]>
Cc: Christian, Forrest (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Subject: RE: Nashville Arrest Plan

Yes, we discussed it yesterday with USAO and FBI.
And I mentioned to them what happened in Philly.
Of the 11 defendants indicted, two are local to TN and four to MI.
The others are scattered in various other states.
FBI stated their plan was to arrest the locals in TN, and leave it up to the other FBI FOs as to arrests v. self surrender.
If they cannot execute simultaneous arrests, then those not arrested will be told to turn themselves in.
The plan was still being formulated as of last night.
I'll connect with the team later today to see what the final plans are.

From: Felte, James (CRT)"<[redacted]>
Sent: Tuesday, October 4, 2022 12:45 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Christian, Forrest (CRT) <[redacted]>; Fitzgerald, Paige (CRT) <[redacted]>
Subject: Nashville Arrest Plan

Sanjay,

Good synopsis and lessons learned summary about the Houck case this morning. In that regard, what is the arrrest/non-arrest plan for Nashville? As an aside, ODAG reached out to FBI Leadership to make sure that the FBI is aware of the Houck case with regards to Nashville, and ODAG asked that we do the same on the line level. To be sure, ODAG stressed that the arrest plans are determined by the FBI, but ODAG wants to make sure that the FBI is considering all relevant factors regarding arrest/non-arrest.

Thanks,

Jim

EXHIBIT 148

From: "Eve, Anita (USAPAE)" <[redacted]>
To: "[redacted] (PH) (FBI)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>
Subject: RE: [EXTERNAL] Good to see doj thuggery deployed towards pro life people
Date: Mon, 26 Sep 2022 07:52:13 -0400
Importance: Normal

I received the one email that I forwarded earlier. Fortunately or maybe not, I've misplaced my cell phone and have only seen emails from members of my office checking in on me. I'm good.
The tragedy is that Mrs. Houck is attempting to taint the public's view of the arrest and prosecution.
I think I called each of you on Friday, so I think my phone is lost under the pile of paperwork that I was attending to this weekend. I'll be clearing things out today and retracing my movements to uncover my phone.
Meanwhile, I will keep you all posted as to the next court date and share comments that I receive from my office. I will be going into the office tomorrow and get started with the discovery. So, [redacted], I'll be reaching out to you regarding all that is considered the discovery and to get the paralegal started on redacting PII so that we can produce the discovery in short order. Today, I am also going to notify Judge Pappert's chambers of the circus that we expect in this case.
Anita

From: [redacted] <[redacted]>
Sent: Sunday, September 25, 2022 9:01 PM
To: Patel, Sanjay (CRT)" <[redacted]>; Eve, Anita (USAPAE) <[redacted]>
Subject: Re: [EXTERNAL] Good to see doj thuggery deployed towards pro life people
Have you been receiving multiple emails from the public?

[redacted]
Special Agent
Federal Bureau of Investigation
Philadelphia Division

From: Patel, Sanjay (CRT)" <[redacted]>
Sent: Sunday, September 25, 2022 7:09:30 PM
To: Eve, Anita (USAPAE) <[redacted]>; [redacted] (PH) (FBI)" <[redacted]>
Subject: [EXTERNAL EMAIL] - Fwd: [EXTERNAL] Good to see doj thuggery deployed towards pro life people
Here's another one

Sent from my iPhone

Begin forwarded message:

From: [redacted] <[redacted]@gmail.com>
Date: September 24, 2022 at 11:58:20 AM EDT
To: "Eve, Anita (USAPAE)" <[redacted]>, "Patel, Sanjay (CRT)"" <[redacted]>
Subject: [EXTERNAL] Good to see doj thuggery deployed towards pro life people

Funny how you left out the "victim" was harassing his kid

Sent from my iPhone

EXHIBIT 149

From: d" <
To: "Felte, James (CRT)" <
Subject: Re: Houck Trial in EDPA
Date: Mon, 30 Jan 2023 15:47:07 -0500
Importance: Normal

Thanks Jim.
a tough pill to swallow.

Sent from my iPhone

On Jan 30, 2023, at 3:04 PM, Felte, James (CRT) < > wrote:

Hey Cathy. The jury just returned not guilty verdicts on both counts, so no need for the PR.

Sanjay- really great effort on a very difficult case. The USAO has been very complimentary of your work and the job you did.

Jim

From: Morris, Catherine (PAO) <
Sent: Monday, January 30, 2023 1:47 PM
To: Felte, James (CRT)" <; Dulaney, Emma (PAO) <
Cc: Moossy, Robert (CRT) <; Weiner, Robert (CRT) <; Beer, Sheldon (CRT)" <; Patel, Sanjay (CRT)" <
Subject: RE: Houck Trial in EDPA

Hi all,

See attached with OPA's edits to the release.

Best,
Catherine

Catherine Morris
Special Assistant to the Director, Office of Public Affairs
U.S. Department of Justice
(m)

From: Morris, Catherine (PAO)
Sent: Friday, January 27, 2023 5:35 PM
To: Felte, James (CRT)" <; Dulaney, Emma (PAO) <
Cc: Moossy, Robert (CRT) <; Weiner, Robert (CRT) <; Beer, Sheldon (CRT)" <; Patel, Sanjay (CRT)" <
Subject: RE: Houck Trial in EDPA

Thanks Jim.

Best,
Catherine

Catherine Morris
Special Assistant to the Director, Office of Public Affairs
U.S. Department of Justice
(m) [redacted]
[redacted]

From: Felte, James (CRT) <[redacted]>
Sent: Friday, January 27, 2023 3:27 PM
To: Morris, Catherine (PAO) <[redacted]>; Dulaney, Emma (PAO) <[redacted]>
Cc: Bradford, Aryele (PAO) <[redacted]>; Moossy, Robert (CRT) <[redacted]>; Weiner, Robert (CRT) <[redacted]>; Beer, Sheldon (CRT) <[redacted]>; Patel, Sanjay (CRT) <[redacted]>
Subject: Houck Trial in EDPA

Cathy & Emma,

We just got word that the Houck case is now with the jury. The trial began on Tuesday. I've attached a bare bones press release which we can supplement with additional facts from trial.

Thanks,

Jim

Jim Felte
Chief, Criminal Section
Civil Rights Division
U.S. Department of Justice

EXHIBIT 150

From: "Moossy, Robert (CRT)" <[redacted]>
To: "Sooknanan, Sparkle (OASG)" <[redacted]>, "Gaston, Molly (ODAG)" <[redacted]>, "Clarke, Kristen (CRT)" <[redacted]>
Cc: "Weiner, Robert (CRT)" <[redacted]>
Subject: Houck NOT guilty both counts
Date: Mon, 30 Jan 2023 15:02:29 -0500
Importance: Normal

Robert J. Moossy, Jr.
Deputy Assistant Attorney General
Civil Rights Division
United States Department of Justice

EXHIBIT 151

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Bernstein, Laura-Kate (CRT)" <[redacted]>
Subject: RE: stats on crimes involving reproductive health?
Date: Tue, 03 Sep 2024 17:13:24 -0400
Importance: Normal

Yes!
First 241 pleas.

From: Bernstein, Laura-Kate (CRT) <[redacted]>
Sent: Tuesday, September 3, 2024 4:12 PM
To: Patel, Sanjay (CRT) <[redacted]>
Subject: RE: stats on crimes involving reproductive health?

Is it correct to say that the three Freestone defendants who pled will be the first defendants to be sentenced for a 241 *plea* involving FACE Act rights?

From: Patel, Sanjay (CRT) <[redacted]>
Sent: Tuesday, September 3, 2024 3:55 PM
To: Bernstein, Laura-Kate (CRT) <[redacted]>
Subject: RE: stats on crimes involving reproductive health?

Not super easy.
I'll share what I have here that I think is relevant from some recent FACE blockade cases.
Kyle or Wil can share the sentences for each of their Nashville Ds:

1. US v Handy (DDC) 22-cr-96 (all prison sentences)
   a. Lauren Handy (lead D) – 57 months
   b. Jonathan Darnel (co-lead D) – 34 months
   c. Jean Marshall – 24 months
   d. Joan Bell – 27 months
   e. John Hinshaw – 21 months
   f. William Goodman – 27 months
   g. Heather Idoni – 24 months
   h. Herb Geraghty – 27 months
   i. Paulette Harlow – 24 months

2. US v. Williams (SDNY) 22-cr-684 (371 conspiracy and felony FACE for force resulting in BI (and phys obstr)
   a. Bevelyn Williams – 41 months imprisonment

3. US v. Moscinski (EDNY) 22-cr-1052 (misd FACE only for supergluing locks and blocking parking lot)
   a. Christopher Moscinski – 12 months imprisonment

Hope this helps!
SP

From: Bernstein, Laura-Kate (CRT) <[redacted]>
Sent: Tuesday, September 3, 2024 3:32 PM
To: Patel, Sanjay (CRT) <[redacted]>; Channapati, Anita (CRT) <[redacted]>
Subject: RE: stats on crimes involving reproductive health?

Got it. Do we have easily accessible info about sentences? I'd like to make an informed statement about avoiding sentencing disparities.

From: Patel, Sanjay (CRT) [redacted]
Sent: Tuesday, September 3, 2024 2:41 PM
To: Bernstein, Laura-Kate (CRT) [redacted]; Channapati, Anita (CRT) [redacted]
Subject: RE: stats on crimes involving reproductive health?

Unfortunately not.
The NGOs, particularly NAF who tracks these stats, won't admit clinic criminal activity is trending down (even though it actually is).

From: Bernstein, Laura-Kate (CRT) [redacted]
Sent: Tuesday, September 3, 2024 2:17 PM
To: Patel, Sanjay (CRT) [redacted]; Channapati, Anita (CRT) [redacted]
Subject: stats on crimes involving reproductive health?

Do we have any statistics on whether criminal activity targeting reproductive health providers is up, down, static, etc? Something I could cite in a sentencing memo?

Thanks,

LK

Laura-Kate Bernstein
Trial Attorney

Criminal Section
Civil Rights Division
U.S. Department of Justice
[redacted]

EXHIBIT 152

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Felte, James (CRT)" <[redacted]>, "Fitzgerald, Paige (CRT)" <[redacted]>
Cc: "Gibson, Rose (CRT)" <[redacted]>
Subject: FW: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT
Date: Wed, 24 Jul 2024 14:40:04 -0400
Importance: Normal

Bossesn–
Sharing the below email I just sent Shelly.
I believe he's on leave this week.
SP

From: Patel, Sanjay (CRT)
Sent: Wednesday, July 24, 2024 2:39 PM
To: Beer, Sheldon (CRT) <[redacted]>
Cc: Channapati, Anita (CRT) <[redacted]>
Subject: FW: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

Shelly –
FACE defendant Bevelyn Williams was sentenced today…41 months imprisonment.
An outstanding result.

Blurb below:

United States v. Chavannes, et al. **(SDNY)**(Sanjay Patel Consulting) On July 24, 2024, the court sentenced Defendant Bevelyn Williams to 41 months imprisonment following her conviction from February 22, of felony FACE Act and conspiracy offenses in the Southern District of New York. Specifically, on June 19 and 20, 2019, Defendant Williams and a co-defendant, Edmee Chavannes, who was acquitted at trial, targeted the patients and providers at a Manhattan area Planned Parenthood clinic. Williams physically blocked the clinic's entrance, threated clinic staff, and used force against clinic employees. Specifically, on both dates, Willaims blocked the clinic's entrance, and threated to assault clinic staff. On June 20, she used force by making physical contact with one clinic escort, and forcefully closing the clinic door on another escort's hand that resulted in bodily injury. The court ordered the 41-month imprisonment sentence to be followed by two years of supervised release.

SP

From: Kelly, Jacqueline (USANYS) 2 <[redacted]>
Sent: Wednesday, July 24, 2024 2:16 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Bagliebter, Jamie (USANYS) <[redacted]>
Subject: FW: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

Hi Sanjay,

Williams was sentenced today to the top of the GL – 41 months. We are very pleased with the outcome.

Thanks for all your assistance along the way.

Jackie

From: USANYS-PressOffice <[redacted]>
Sent: Wednesday, July 24, 2024 12:28 PM
Subject: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

PR Header

FOR IMMEDIATE RELEASE
Wednesday, July 24, 2024
http://www.justice.gov/usao/nys

CONTACT: U.S. ATTORNEY'S OFFICE
Nicholas Biase, Lauren Scarff,
Shelby Wratchford
[redacted]

TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

Damian Williams, the United States Attorney for the Southern District of New York, announced today that BEVELYN BEATTY WILLIAMS was sentenced to 41 months in prison for violating the Freedom of Access to Clinic Entrances Act (the "FACE Act") in June 2020 in connection with her interference, including by threats and force, with individuals seeking to obtain and provide lawful reproductive health services at a reproductive health center in Manhattan. On February 22, 2024, WILLIAMS was convicted after a nine-day jury trial of one count of violating the FACE Act before U.S. District Judge Jennifer L. Rochon, who imposed today's sentence.

U.S. Attorney Damian Williams said: "Bevelyn Beatty Williams repeatedly intimidated and interfered with individuals seeking and providing critical reproductive health services. She did so by physically blocking access to clinics, threatening staff, and by force. This Office and our law enforcement partners are committed to ensuring that patients exercising their legal right to obtain reproductive health services, and healthcare facilities and their staff providing those services, can do so without unlawful interference or fear of threats or violence."

According to evidence admitted at trial and other public filings and statements made in Court:

On June 19, 2020, and June 20, 2020, WILLIAMS threatened and used force against patients and staff members at a reproductive health center located in lower Manhattan (the "Health Center") and blocked patients and staff members from accessing the Health Center. In one instance, and as captured on video, WILLIAMS pressed her body against the door of the Health Center's patient entrance and refused to move, preventing a Health Center volunteer from entering the Health Center. As a Health Center staff member ("Victim-1") attempted to open the door for the volunteer, WILLIAMS purposefully leaned against the door, crushing Victim-1's hand. Victim-1 yelled, "She's crushing my hand," but WILLIAMS remained against the door, trapping Victim-1's hand and injuring it.

At various times on June 19 and 20, 2020, WILLIAMS stood directly in front of the Health Center entrances. WILLIAMS initially blocked the main entrance used by patients, causing the Health Center to have to divert patients to enter through the staff entrance. WILLIAMS responded by moving to block the staff entrance and directing others to do the same.

WILLIAMS livestreamed some of her conduct on June 19 and 20, 2020, on a social media account. On the livestream on June 19, 2020, WILLIAMS stood within inches of the Health Center's chief administrative officer and threatened to "terrorize this place" and warned that "we're gonna terrorize you so good, your business is gonna be over mama." Similarly, WILLIAMS stood within inches of a Health Center security officer and threatened "war." WILLIAMS also stated that she would act by "any means necessary."

In addition to WILLIAMS's conduct in Manhattan, on multiple other occasions from at least 2019 to 2022, WILLIAMS and others intimidated and interfered with individuals seeking to obtain or provide reproductive health services at other health clinics across the country, including in Florida, Tennessee, Georgia, and Brooklyn, New York. For example, in January 2022, WILLIAMS travelled to a health center in Fort Myers, Florida, where she directed other individuals to block health center entrances. As a result of the blockade, medical staff was delayed in treating at least a dozen patients, three of whom were scheduled for time-sensitive procedures that could have resulted in bleeding, infection, or significant pain without timely treatment. In addition, in July 2022, WILLIAMS invaded a health center in Atlanta, Georgia, where she screamed through the door at patients attempting to enter the facility until they were forced to leave. Among other things, WILLIAMS shouted that she'd go to jail before letting patients enter the facility for an abortion and that she was "not afraid to get arrested."

* * *

In addition to the prison term, WILLIAMS, 33, of Ooltewah, Tennessee, was sentenced to two years of supervised release.

Mr. Williams praised the outstanding work of the Federal Bureau of Investigation.

The prosecution of this case is being handled by the Office's Civil Rights Unit in the Criminal Division. Assistant U.S. Attorneys Emily A. Johnson, Mitzi Steiner, and Jamie Bagliebter, with the assistance of Paralegal Specialist Isabel Loftus, are in charge of the prosecution.

24-255 ###

You have received this e-mail because you have asked to be notified of changes to the U.S. Attorney's Office for the Southern District of New York's website. GovDelivery is providing this service on behalf of the Executive Office for United States Attorneys, Department of Justice, 950 Pennsylvania Ave., NW | Washington, DC 20530 | 202-514-2000 and may not use your subscription information for any other purposes.

Manage your Subscriptions | Department of Justice Privacy Policy | GovDelivery Privacy Policy

Follow us on Facebook | Follow us on Twitter | Follow us on LinkedIn | SDNY Website

EXHIBIT 153

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Kelly, Jacqueline (USANYS) 2" <[redacted]>
Cc: "Bagliebter, Jamie (USANYS)" <[redacted]>
Subject: RE: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT
Date: Wed, 24 Jul 2024 14:26:17 -0400
Importance: Normal

Wow!
Congratulations, such an incredible result.
Thank you for sharing the great news.
SP

From: Kelly, Jacqueline (USANYS) 2 <[redacted]>
Sent: Wednesday, July 24, 2024 2:16 PM
To: Patel, Sanjay (CRT) <[redacted]>
Cc: Bagliebter, Jamie (USANYS) <[redacted]>
Subject: FW: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

Hi Sanjay,

Williams was sentenced today to the top of the GL – 41 months. We are very pleased with the outcome.

Thanks for all your assistance along the way.

Jackie

From: USANYS-PressOffice <[redacted]>
Sent: Wednesday, July 24, 2024 12:28 PM
Subject: TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

PR Header

FOR IMMEDIATE RELEASE
Wednesday, July 24, 2024
http://www.justice.gov/usao/nys

CONTACT: U.S. ATTORNEY'S OFFICE
Nicholas Biase, Lauren Scarff,
Shelby Wratchford
[redacted]

TENNESSEE WOMAN SENTENCED TO 41 MONTHS IN PRISON FOR VIOLATING THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT

Damian Williams, the United States Attorney for the Southern District of New York, announced today that BEVELYN BEATTY WILLIAMS was sentenced to 41 months in prison for violating the Freedom of Access to Clinic Entrances Act (the "FACE Act") in June 2020 in connection with her interference, including by threats and force, with individuals seeking to obtain and provide lawful reproductive health services at a reproductive health center in Manhattan. On February 22, 2024, WILLIAMS was convicted after a nine-day jury trial of one count of violating the FACE Act before U.S. District Judge Jennifer L. Rochon, who imposed today's sentence.

U.S. Attorney Damian Williams said: "Bevelyn Beatty Williams repeatedly intimidated and interfered with individuals seeking and providing critical reproductive health services. She did so by physically blocking access to clinics, threatening staff, and by force. This Office and our law enforcement partners are committed to ensuring that patients exercising their legal right to obtain reproductive health services, and healthcare facilities and their staff providing those services, can do so without unlawful interference or fear of threats or violence."

According to evidence admitted at trial and other public filings and statements made in Court:

On June 19, 2020, and June 20, 2020, WILLIAMS threatened and used force against patients and staff members at a reproductive health center located in lower Manhattan (the "Health Center") and blocked patients and staff members from accessing the Health Center. In one instance, and as captured on video, WILLIAMS pressed her body against the door of the Health Center's patient entrance and refused to move, preventing a Health Center volunteer from entering the Health Center. As a Health Center staff member ("Victim-1") attempted to open the door for the volunteer, WILLIAMS purposefully leaned against the door, crushing Victim-1's hand. Victim-1 yelled, "She's crushing my hand," but WILLIAMS remained against the door, trapping Victim-1's hand and injuring it.

At various times on June 19 and 20, 2020, WILLIAMS stood directly in front of the Health Center entrances. WILLIAMS initially blocked the main entrance used by patients, causing the Health Center to have to divert patients to enter through the staff entrance. WILLIAMS responded by moving to block the staff entrance and directing others to do the same.

WILLIAMS livestreamed some of her conduct on June 19 and 20, 2020, on a social media account. On the livestream on June 19, 2020, WILLIAMS stood within inches of the Health Center's chief administrative officer and threatened to "terrorize this place" and warned that "we're gonna terrorize you so good, your business is gonna be over mama." Similarly, WILLIAMS stood within inches of a Health Center security officer and threatened "war." WILLIAMS also stated that she would act by "any means necessary."

In addition to WILLIAMS's conduct in Manhattan, on multiple other occasions from at least 2019 to 2022, WILLIAMS and others intimidated and interfered with individuals seeking to obtain or provide reproductive health services at other health clinics across the country, including in Florida, Tennessee, Georgia, and Brooklyn, New York. For example, in January 2022, WILLIAMS travelled to a health center in Fort Myers, Florida, where she directed other individuals to block health center entrances. As a result of the blockade, medical staff was delayed in treating at least a dozen patients, three of whom were scheduled for time-sensitive procedures that could have resulted in bleeding, infection, or significant pain without timely treatment. In addition, in July 2022, WILLIAMS invaded a health center in Atlanta, Georgia, where she screamed through the door at patients attempting to enter the facility until they were forced to leave. Among other things, WILLIAMS shouted that she'd go to jail before letting patients enter the facility for an abortion and that she was "not afraid to get arrested."

* * *

In addition to the prison term, WILLIAMS, 33, of Ooltewah, Tennessee, was sentenced to two years of supervised release.

Mr. Williams praised the outstanding work of the Federal Bureau of Investigation.

The prosecution of this case is being handled by the Office's Civil Rights Unit in the Criminal Division. Assistant U.S. Attorneys Emily A. Johnson, Mitzi Steiner, and Jamie Bagliebter, with the assistance of Paralegal Specialist Isabel Loftus, are in charge of the prosecution.

24-255 ###

You have received this e-mail because you have asked to be notified of changes to the U.S. Attorney's Office for the Southern District of New York's website. GovDelivery is providing this service on behalf of the Executive Office for United States Attorneys, Department of Justice, 950 Pennsylvania Ave., NW · Washington, DC 20530 · 202-514-2000 and may not use your subscription information for any other purposes.

Manage your Subscriptions | Department of Justice Privacy Policy | GovDelivery Privacy Policy

Follow us on Facebook | Follow us on Twitter | Follow us on LinkedIn | SDNY Website

EXHIBIT 154

From: "Steiner, Mitzi (USANYS)" <[redacted]>
To: "Patel, Sanjay (CRT)" <[redacted]>
Cc: "Johnson, Emily (USANYS) 2" <[redacted]>
Subject: RE: Jury Instructions
Date: Wed, 24 Jul 2024 15:08:31 -0400
Importance: Normal

Thanks Sanjay! The GL range was 37-46 months so the sentence was middle of the GL.

From: Patel, Sanjay (CRT)" <[redacted]>
Sent: Wednesday, July 24, 2024 2:42 PM
To: Steiner, Mitzi (USANYS) <[redacted]>
Cc: Johnson, Emily (USANYS) 2 <[redacted]>
Subject: RE: Jury Instructions

Congratulations Mitzi and Emily!
That is au outstanding result.
A top end guidelines sentence, right?
Thank you so much for the update, and your tenaciousness in prosecuting this case!

From: Steiner, Mitzi (USANYS) <[redacted]>
Sent: Wednesday, July 24, 2024 2:35 PM
To: Patel, Sanjay (CRT)" <[redacted]>
Cc: Johnson, Emily (USANYS) 2 <[redacted]>
Subject: RE: Jury Instructions

Hi Sanjay,

We wanted to update you that the defendant received a 41-month prison sentence today. We appreciate all of your assistance on this important case!

Thanks,
Mitzi

From: Patel, Sanjay (CRT)" <[redacted]>
Sent: Monday, July 15, 2024 9:30 AM
To: Steiner, Mitzi (USANYS) <[redacted]>
Cc: Johnson, Emily (USANYS) 2 <[redacted]>
Subject: RE: Jury Instructions

Hi, Mitzi and Emily!
Hope you both are well and staying cool during the northeast heat wave!

Over the past couple of weeks, several of the Nashville 241/242 defendants were sentenced.
I don't have all of the sentences at my fingertips, but you can find them at 22-cr-327 (MDTN) (US v. Gallagher, et al).
Those sentences weren't as significant as the Handy defendants because there was no force or violence involved in the Gallagher case.

Good luck with Williams, and fingers crossed that we get what we ask for!
Let me know if I can support in any way.

SP

From: Steiner, Mitzi (USANYS) <[redacted]>
Sent: Monday, July 15, 2024 9:21 AM
To: Patel, Sanjay (CRT)e[redacted]
Cc: Johnson, Emily (USANYS) 2 <[redacted]>
Subject: RE: Jury Instructions

Hi Sanjay,

I hope all is well. Our sentencing submission for Bevelyn Williams is due to the Court on Wednesday, July 17. We wanted to include other sentencings in FACE Act cases in our submission. I am aware of the recent DDC sentencings in *US v Handy, et al*, 22 Cr. 96 (CKK), but are there any other FACE Act sentencings you would recommend we direct the Court to?

Thanks,
Mitzi

From: Steiner, Mitzi (USANYS)
Sent: Wednesday, March 20, 2024 2:26 PM
To: Patel, Sanjay (CRT)e[redacted]
Cc: Johnson, Emily (USANYS) 2 <[redacted]>
Subject: RE: Jury Instructions

Hi Sanjay,

Hope you're having a good week too. Sentencing is scheduled for May 28 at 2 pm.

Thanks,
Mitzi

From: Patel, Sanjay (CRT)e[redacted]
Sent: Wednesday, March 20, 2024 1:50 PM
To: Steiner, Mitzi (USANYS) <[redacted]>
Cc: Johnson, Emily (USANYS) 2 <[redacted]>
Subject: RE: Jury Instructions

Hey, Mitzi and Emily –
Hope you're both having a great week.
Can you remind me when Williams' sentencing date is?
Thanks!
SP

From: Steiner, Mitzi (USANYS) <[redacted]>
Sent: Thursday, February 29, 2024 4:37 PM
To: Patel, Sanjay (CRT)e[redacted]
Cc: Johnson, Emily (USANYS) 2 <[redacted]>
Subject: Jury Instructions

Hi Sanjay,

It was great speaking with you earlier. We've attached the transcript of our charge. Let us know if you have any questions.

Thanks,
Mitzi

Mitzi S. Steiner
Assistant United States Attorney
United States Attorney's Office
Southern District of New York
[redacted]
Tel: [redacted]
Email: [redacted]

EXHIBIT 155

From: "Fitzgerald, Paige (CRT)" <[redacted]>
To: "Moossy, Robert (CRT)" <[redacted]>
Cc: "Felte, James (CRT)" <[redacted]>, "Patel, Sanjay (CRT)" <[redacted]>
Subject: FACE matters
Date: Fri, 17 Sep 2021 18:10:36 -0400
Importance: Normal
Attachments: FACE_Resource_Booklet_-_review_and_comments_pf2.docx

---

HI, Robert –

As requested for your meeting with the DAG on Monday, below is an updated list of our FACE-related activity over the past two weeks; our pending cases and matters; and bullets re: the cases we've done over the past 10 years. A huge thank you to Sanjay for all his work on these projects, especially the re: website.

Task Force:

1. Sought and received approval from leadership offices to revived the Task Force Resource Booklet initially drafted in 2016. Worked with the FBI and USMS to get input and updated materials. FBI provided new content; USMS did not, but indicated that they supported the project and would "clear" it. Draft is attached – looking to "clean it up" before distributing, but substance is completed.
2. Updated CRT Criminal Section homepage to provide a new link highlighting the work of the National Task Force on Violence Against Reproductive Health Care Providers, and providing links to other useful information, which went live today. National Task Force On Violence Against Reproductive Health Care Providers (justice.gov) (Note: I will have some edits to this, mostly stylistic).
3. Prepared talking points and draft statements that formed the basis of AAG's remarks at a convening of NGO stakeholders 2 days after Texas law SB8 went into effect, as well as for the AG's statement issued 2 days later.
4. Participated in the NGO convening.
5. Followed up afterwards with multiple individuals who attended the convening and had questions.
6. Sanjay is working with the NGOs to schedule a follow-up meeting.

Pending indicted cases:

1. SDOH (Columbus) FACE case indicted yesterday.
2. In DE, the USAO (without our participation), charged Sam Gullick for a Molotov cocktail toss and spray paint vandalism. Defendant pled guilty and will be sentenced in Oct.
3. In MDFL, we worked out a global plea where Def pled guilty to state felonies and a FACE Act violation. He was sentenced by state court to 364d + 7 yrs probation. He will be sentenced on the FACE case in Oct.

Pending active matters:

1. Two felony FACE GJ investigations (auth obtained) in DC and NE.
2. Sixteen other active misdemeanor investigations on-going in multiple districts around the country.

Cases over the past 10 years:

- In 2021, a defendant pled guilty to a FACE Act violation and other state felony offenses for throwing a Molotov cocktail at a Fort Myers, Florida, abortion clinic.
- In 2021, a defendant pled guilty for damaging a Newark, Delaware, abortion clinic. The defendant threw a Molotov cocktail at the facility and vandalized it with spray paint.
- In 2020, a defendant pled guilty and was sentenced to two years imprisonment for FACE Act related offenses in connection with a bomb threat call the defendant made to a Jacksonville, Florida, abortion clinic.

- In 2019, a defendant was indicted for FACE Act violations and other federal offenses related to a 2015 shooting at a Planned Parenthood facility in Colorado Springs, Colorado. The defendant traveled to the facility and shot at several civilians, killing two and injuring three others. He then forced his way into the clinic where staff and patients hid. During a stand-off with the police, the defendant shot at police, killing one officer and injuring several others. The defendant also shot a civilian who was sheltering in place. The case is currently pending in federal district court.
- In 2019, a defendant pled guilty to federal offenses, including a FACE Act violation, for causing damage to a reproductive health care clinic in Columbia, Missouri. The defendant threw a Molotov cocktail through the front door of a Planned Parenthood clinic. The defendant was sentenced to five years imprisonment.
- In 2018, a defendant directed a threatening social media post to Planned Parenthood facilities and staff. The defendant plead guilty to federal offenses, including a FACE Act charge, and was sentenced to six months imprisonment.
- A defendant was charged with FACE Act and other federal offenses for sending several threatening emails in 2017 to abortion clinics located in Chicago, Illinois, and Hammond, Indiana. The defendant pled guilty and was sentenced to 18 months imprisonment.
- A defendant pled guilty to committing a FACE Act violation and another related federal offense for making several threatening telephone calls to an Anchorage, Alaska, area reproductive health care clinic in 2016. The defendant had made a death threat and a bomb threat. The defendant was sentenced to probation.
- In 2016, two defendants were charged with FACE Act violations for vandalizing a Baltimore, Maryland, area abortion clinic on two separate occasions. One defendant pled guilty and the other was convicted at trial. Both defendants were sentenced to probation and ordered to pay restitution.
- A defendant pled guilty to FACE Act violations for making telephonic death threats in 2014 to two Minneapolis, Minnesota, reproductive health care clinics. The defendant was sentenced to a term of imprisonment.
- An Indiana defendant was convicted and sentenced to probation for committing a FACE Act violation in 2013. The defendant broke into a Bloomington, Indiana, Planned Parenthood clinic and caused extensive damage. The defendant was ordered to pay restitution for the damage caused.
- A defendant was convicted and sentenced to probation for a FACE Act violation. The defendant was charged in 2012 for calling a Virginia OBGYN practice and making a bomb threat because the OBGYN practice offered abortion services.
- In 2012, a defendant was convicted by a jury of FACE Act and federal arson charges for setting fire to a Planned Parenthood facility located in Grand Chute, Wisconsin. The defendant was sentenced to a total of 11 years imprisonment.
- A defendant pled guilty to a FACE Act violation and other federal charges for throwing a Molotov cocktail at a Planned Parenthood clinic in Madera, California, and other offenses committed in 2011. The defendant was sentenced to five years imprisonment and ordered to pay restitution.

EXHIBIT 156

From: a[redacted] <[redacted]>
To: "Trepel, Samantha (CRT)" <[redacted]>
Cc: "Perras, Christopher (CRT)" <[redacted]>
Subject: Re: Jane's Revenge - FL investigations update
Date: Mon, 03 Oct 2022 12:04:44 -0400
Importance: Normal

Happy to have you join.
I don't think Lisa will have any heartburn with a bunch of us on the call.
If Thurs at 330 doesn't work for everyone, can one of you join whenever the call happens?
I've [redacted] this week clogging my calendar.
From my perspective, I have a very strong interest in charging a FACE case against a Jane's Revenge subject.
Thanks,
SP

Sent from my iPhone

On Oct 3, 2022, at 10:28 AM, Trepel, Samantha (CRT) <[redacted]> wrote:

Ditto. I also want to be a bit sensitive to freaking the AUSA out purely based on the # of Main Justice attorneys . . .

From: Perras, Christopher (CRT) <[redacted]>
Sent: Monday, October 3, 2022 11:27 AM
To: Patel, Sanjay (CRT) <[redacted]>; Trepel, Samantha (CRT) <[redacted]>
Subject: RE: Jane's Revenge - FL investigations update

Hi Sanjay – would you like me or Sam to join you on the call? Up to you – I don't feel strongly either way.

From: Cella, John (NSD) <[redacted]>
Sent: Monday, October 3, 2022 11:05 AM
To: Patel, Sanjay (CRT) <[redacted]>; Slavin, Dmitriy (NSD) <[redacted]>; Trepel, Samantha (CRT) <[redacted]>; Perras, Christopher (CRT) <[redacted]>; Thelwell, Lisa (USAFLM) <[redacted]>
Subject: Jane's Revenge - FL investigations update

Good morning all,

Just putting everybody on one chain –

Lisa – Sanjay and the other CRT attorneys were hoping to touch base on the status of the three FL investigations that you have been tracking.

I know Lisa, Dmitriy, and I are all available for a call later today and Thursday morning. Sanjay and CRT team, would one of those windows work for you?

For everyone's benefit, I've copied the basic info about these three and what I understand to be the current status below.

John

Date	Victim	District	Damage	Details	Claimed	Warrants so far	Notes
5/28/2022	[redacted] Florida	MDFL	Vandalism + property damage	Graffiti reading: "JANES REVENGE", "If abortions aren't SAFE Then neither are you"; anarchy symbols	6/14/2022 communique posted on Jane's Revenge blog on noblogs.org, an anonymous anarchist hosting platform	[redacted]	One target identified – Caleb Hunter Freestone. [redacted]
6/26/2022	[redacted] Florida	MDFL	Vandalism + property damage	Graffiti reading: "Jane's Revenge"; "We're Coming for U", "We are everywhere", "ABOrtiON 4 ALL", and anarchy symbols	Not yet claimed, but attributed based on graffiti messages	[redacted]	
7/3/2022	[redacted] Florida	MDFL	Vandalism + property damage	Graffiti reading: "If abortions aren't safe the [sic] neither are you"	Not yet claimed, but attributed based on graffiti messages	[redacted]	

John Cella
Trial Attorney, Counterterrorism Section
National Security Division
U.S. Department of Justice
Office: [redacted]
Mobile: [redacted]
(S): [redacted]
(TS): [redacted]

EXHIBIT 157

From: "Patel, Sanjay (CRT)" <[redacted]>
To: "Gibson, Rose (CRT)" <[redacted]>
Subject: RE: Jane's Revenge Search Warrants
Date: Thu, 06 Oct 2022 17:58:41 -0400
Importance: Normal
Inline-Images: image001.jpg

Yes to both!
I definitely need to keep the new MDFL FACE matter bc it may be the first FACE case we bring with a pro-life victim.
And Anna is the perfect choice.
Thanks!

From: Gibson, Rose (CRT)[redacted]
Sent: Thursday, October 6, 2022 5:15 PM
To: Patel, Sanjay (CRT)[redacted]
Subject: RE: Jane's Revenge Search Warrants

Okay. Let's please be mindful you opening too many more FACE cases. You are pretty swamped. Also, I recommend we add Anna to [redacted]. Thoughts?

Rose Gibson
Deputy Chief, Criminal Section
Civil Rights Division
U.S. Department of Justice
[redacted]

From: Patel, Sanjay (CRT)[redacted]
Sent: Thursday, October 6, 2022 4:35 PM
To: Gibson, Rose (CRT)[redacted]
Subject: FW: Jane's Revenge Search Warrants

Rosen-
I'm going to open a Red FACE case (MDFL).
FBI opened this as a DT matter so we never got the opening EC.
I'll send it along when I get it.

It involves three separate vandalism incidents of pro-life pregnancy centers.
We've identified a couple of subjects.
There is some more investigation to do, but I suspect we'll want to quickly charge when the time is right.
Likely just a misd 248(a)(3) violation, but USAO wants to indict.
So, I'll be writing this up for you next week just in case it is gj'd.

SP

From: Thelwell, Lisa (USAFLM) <[redacted]>
Sent: Thursday, October 6, 2022 4:23 PM

To: Patel, Sanjay (CRT)[redacted]
Subject: Jane's Revenge Search Warrants

Sanjay,

We've done search warrants for [redacted]. The PDFs are the court copies (black and white). The word doc shows the color photos.

Thanks,

Lisa M. Thelwell
Assistant U.S. Attorney
Human Trafficking Coordinator
Special Victims Section
United States Attorney's Office
Middle District of Florida
[redacted]