

Planned Parenthood to Build Regional Abortion Center in New Orleans:
Detailed Fact Report with Citations

After purchasing three parcels of land worth \$900,000 at 4640/4636/4624 S. Claiborne Avenue in New Orleans near Napoleon Avenue (see map and photos at end of document), Planned Parenthood Gulf Coast, an affiliate of Planned Parenthood Federation of America, the largest abortion business in the nation, plans to open a \$4.2 million dollar 7,000 square foot facility on Claiborne Avenue in 2014.

Planned Parenthood has indicated they will perform abortions at the new facility, and based on the material presented below, we anticipate abortions will increase in New Orleans through their new facility. As a coalition committed to a peaceful New Orleans, more abortion and more Planned Parenthood is not the future our city needs.

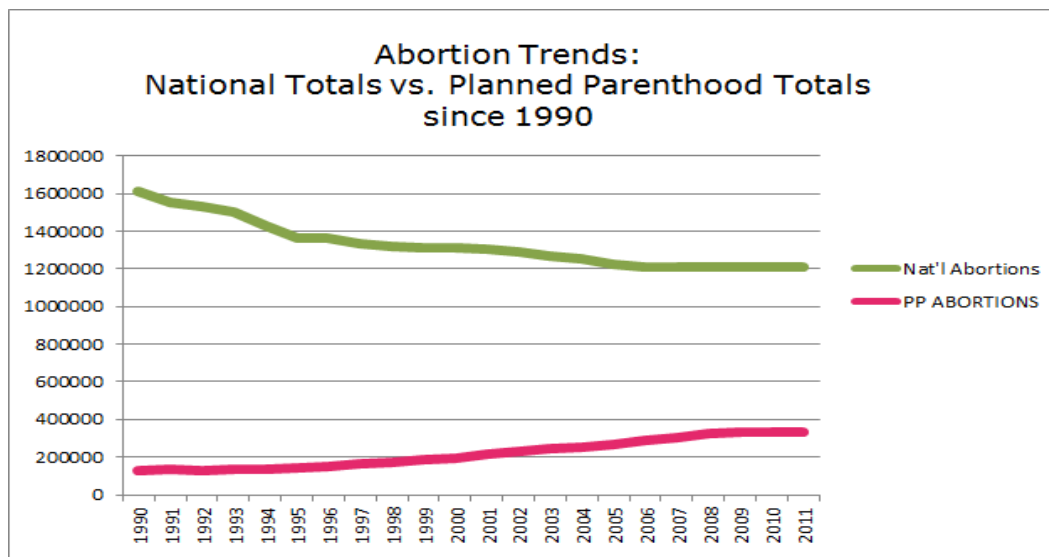
Facts are Clear: More Planned Parenthood = More Abortion

Planned Parenthood (PP) is the nation's largest abortion business, performing approximately 1/3 of U.S. abortions annually. ⁱ

- **Setting Abortion Records:** In 2011, Planned Parenthood set their own record by performing 333,964 abortions. ⁱⁱ
- **Over One Million in Three Years:** Over the past three reported years (2009-2011), Planned Parenthood has performed nearly one million abortions (995,687). According to their annual reports, abortions performed by PP 332,278 in 2009; 329,445 in 2010; 333,964 in 2011

In 2011,
PP performed
a record-high
333,964
abortions nationally.
The population of Orleans
Parish was 360,740.

Planned Parenthood regularly claims its mission will result in fewer abortions. The following quote, taken from [Planned Parenthood Gulf Coast's website](#) on January 21, 2013, said, "Anyone who wants to decrease



the number of abortions in the United States should join with Planned Parenthood in ensuring that women

Coalition Members:

Louisiana Right to Life • Bioethics Defense Fund • Castle Rock Community Church • Catholic Archdiocese of New Orleans • Celebration Church • Cornerstone Christian Center • Cornerstone Full Gospel Fellowship • Edgewater Baptist Church • Franklin Avenue Baptist Church • Gideon Christian Fellowship • Israelite Missionary Baptist Church • Louisiana Family Forum • The Root 504 Project • The Vine Church New Orleans • Urban Reach Ministries

and families have access to family planning and birth control, the best way to reduce the number of unintended pregnancies and reduce the need for abortion. We can all agree on that."

Even with this claim, Planned Parenthood continues to perform more abortions every year, even though abortion rates on the national scale over the past 20 years have either decreased or remained consistent on a yearly basis.ⁱⁱⁱ The "Abortion Trends" chart indicates the trend of Planned Parenthood abortion totals increasing while national totals decrease or remain the same.

By opening its first abortion facility in New Orleans, Planned Parenthood will continue its trend of performing more abortions, and will increase the number of abortions performed in New Orleans.

PP Overwhelmingly Favors Abortion for Pregnant Clients

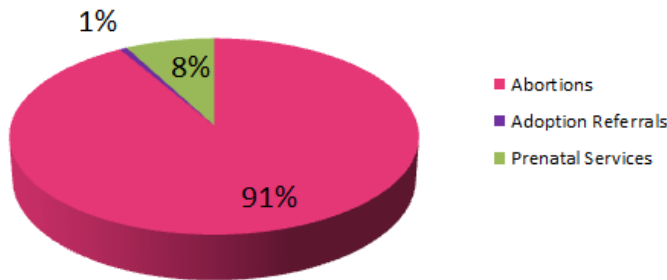
Planned Parenthood's annual reports shows its overwhelming preference for abortion over adoption or even prenatal care.

- **PP Performs Abortions on 9 out of 10 pregnant women that walk through its doors:** In 2011, abortions made up 92% of Planned Parenthood's pregnancy services, while prenatal care and adoption referrals accounted for only 7% (28,674) and 0.6% (2,300), respectively.^{iv}
- **For every adoption referral, Planned Parenthood performed 145 abortions in 2011^v**

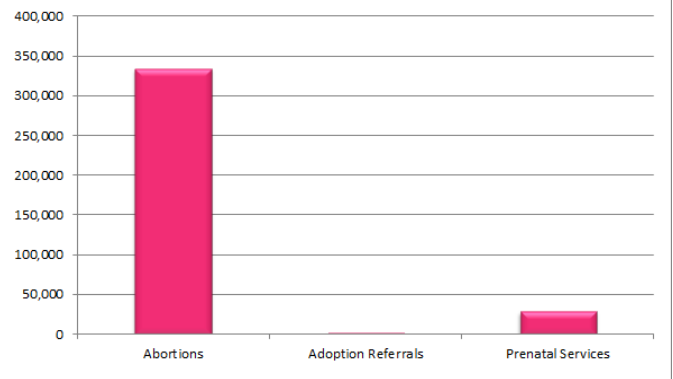


The following two charts illustrate 2011 numbers:

Planned Parenthood 2011 Total Pregnancy Related Services
Source: 2011 Planned Parenthood Annual Report



Planned Parenthood 2011 Total Pregnancy Related Services
Source: 2011 Planned Parenthood Annual Report



Other Planned Parenthood Services Readily Available in New Orleans

Every service that Planned Parenthood could offer (based on Planned Parenthood's national list of services) at its Claiborne Avenue facility is readily available at both public and private facilities in the greater New Orleans area.

- Visit www.NolaNeedsPeace.com/services for a complete listing of alternative health care facilities.
- At its current Magazine Street location, PP does not perform abortions. They offer other services and refer to other abortion facilities for abortion.

All other women's health services PP will offer are readily available in New Orleans



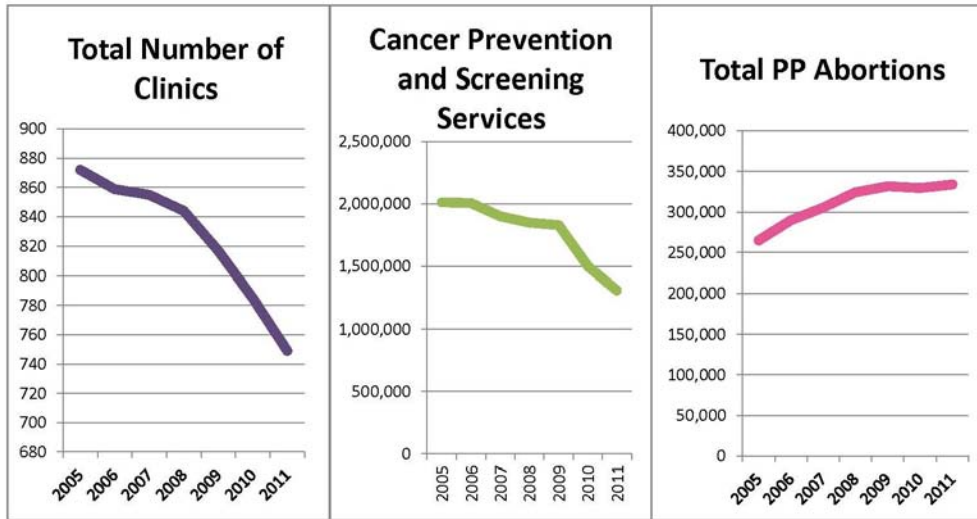
**MORE
PLANNED PARENTHOOD
= MORE ABORTIONS**

A distinctive aspect of the Claiborne Avenue location will be its ability to perform abortions.

Contraception and Cancer Services Dropping While Abortion Continues to Rise

Despite their public focus on prevention services such as contraception and cancer screening, these services have dropped in recent years, while abortions continue to increase at Planned Parenthood.

- **Fewer Clinics: PP has downsized its clinics by 14% since 2005.**
 - The total number of Planned Parenthood clinics has decreased every year since 1995, when they had 938 clinics nationwide.
 - The last time Planned Parenthood had fewer than 749 clinics was 1984, when there were 735 clinics.
 - In 2005, PP had 872 clinics. As of its last 2011-2012 report, PP operated 749 clinics.^{vi}
- **Less Contraception: Contraception services have dropped by 8% since 2005.**
 - According to annual reports, in 2005 Planned Parenthood’s contraceptive services numbered 3,728,549.^{vii} This decreased to 3,436,813 in 2011.^{viii}
- **Fewer Cancer Prevention Services: Cancer services have dropped by 35% since 2005.**
 - In 2005 Planned Parenthood’s cancer screenings & prevention services numbered 2,011,637.^{ix} This decreased to 1,307,570 in 2011.^x
- **More Abortions: Abortion services have increased 26% since 2005.**
 - Abortion services at PP have **increased by 26%** since 2005, when PP performed 264,943 abortions. Planned Parenthood performed 333,964 abortions in 2011.
 - The increase is even more dramatic when examined since 2000. In 2000, Planned Parenthood performed 197,070 abortions.^{xi} There was a 69% increase in abortions from 2000 to 2011.



*Chart is structured to show comparative trends, not a numerical comparison.

Even though their number of clinics and other services are on the decline, abortion continues to increase at Planned Parenthood. The chart depicts these numbers, showing that even as other services decrease, abortion continues to increase.

Taxpayer Funding, Excess Revenue, and Net Assets

- **Massive Taxpayer Funding of Planned Parenthood:** During fiscal year 2011-2012, Planned Parenthood reported receiving a record \$542 million in taxpayer funding in the form of government grants, contracts, and Medicaid reimbursements.^{xii}



- **Taxpayer funding consists of 45% of Planned Parenthood's annual revenue.**^{xiii}
- **Planned Parenthood reported \$87.4 million in excess revenue, and more than \$1.2 billion in net assets.**^{xiv}

Taxpayer funding consists of 45% of Planned Parenthood's annual revenue.
(During 2011 PP received \$542 MILLION in taxpayer funding.)

Abortion Only 3% of PP “Services”, but HALF of Health Services Income

Given the controversial nature of abortion, there is heated debate over whether abortion is a key Planned Parenthood money-maker. Because the facts are accessible, this debate is unnecessary.

Planned Parenthood claims that abortion constitutes 3% of the company's services. While technically true, an unorthodox calculation underlies that statistic. Planned Parenthood's 3% calculation equally weighs all products and services; for example, the calculation counts a condom, a pregnancy test and a \$468 abortion each as one service, no matter the cost or the magnitude of that service. This is misleading and, as in any financial exercise, the correct assessment is a dollar-weighted one.

As one might expect from the nation's largest abortion business, abortion is a meaningful contributor to Planned Parenthood's health center income. When you estimate Planned Parenthood's abortion income based on a median charge for an abortion at \$470^{xv}, it clearly shows its financial impact is much more significant than three percent.

- **2008-2009: Abortion Income Equals 38%** of Health Center Income
 - Planned Parenthood's health center income was \$404.9 million.
 - Planned Parenthood performed 324,008 abortions.
 - At \$470 per abortion, Planned Parenthood collected \$152.3 million in abortion revenue, or 38% of its health services income.
- **2009-2010: Abortion Income Equaled 49%** of Non-Governmental Health Services revenue
 - Planned Parenthood's non-governmental health services revenue was \$320.1 million.
 - Planned Parenthood performed 331,796 abortions.
 - At \$470 per abortion, Planned Parenthood collected \$155.9 million in abortion revenue, or 49% of its non-governmental health services revenue.
- **2010-2011: Abortion Income Equaled 51%** of Non-Governmental Health Services revenue
 - Planned Parenthood's non-governmental health services revenue was \$305.4 million.
 - Planned Parenthood performed 329,445 abortions.
 - At \$470 per abortion, Planned Parenthood collected \$154.8 million in abortion revenue, or 51% of its non-governmental health services revenue.
- **2011-2012: Abortion Income Equaled 50.4%** of Non-Governmental Health Services Income
 - Planned Parenthood's non-governmental health services revenue was \$311.5 million.
 - Planned Parenthood performed 333,964 abortions.
 - At \$470 per abortion, Planned Parenthood collected **\$157 million in abortion revenue**, or 50.4% of its non-governmental health services revenue.

Based on these figures, abortion accounts for HALF of Planned Parenthood's non-governmental health services income, a far cry from 3%.

As Planned Parenthood's taxpayer funding increased, especially between the 2008-2009 and 2009-2010 period, PP altered its method of reporting health center income, making it more difficult to evaluate the portion of abortion revenue on the overall income of the health centers, including taxpayer / governmental revenue.^{xvi} Using 2011-2012 as an example, though, when you lump governmental revenue with non-governmental health services income, abortion revenue still accounts for 18% of service revenue. In a business providing many services with significant government income, 18% is a meaningful revenue contributor.^{xvii}

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In addition to an ever-growing portion of its budget from taxpayer funding (even though certain services, such as contraception and cancer prevention services, are decreasing), Planned Parenthood's business model relies on bringing in health center income from abortion. But even with the significant income from abortion, can we say Planned Parenthood is an abortion business? Consider these points:

- Planned Parenthood inflates its list of annual overall services by counting services that are part and parcel of the abortion regimen at Planned Parenthood. For example, PP performed 1.15 million pregnancy tests in 2010. Clearly, in order for PP to perform an abortion, they have to first administer a pregnancy test. Since our statistics showed above that PP performs an abortion on 9 out of 10 pregnant women, 9 out of these 10 pregnancy tests, if positive, would be followed by an abortion.
- If an airplane company sells more spare parts than airplanes, is it a spare parts company? No, it would be an airplane manufacturing company. This is roughly equivalent to PP's claim that only 3% of its services are abortion, although 30+% of its services revenue is abortion related. An airplane manufacturer, such as Boeing, is an aircraft sales company, and PP is a surgical abortion sales company.^{xviii}

Abortion, Planned Parenthood, and their Impact on Minorities

Abortion's impact on the black community is devastating. And Planned Parenthood, the nation's largest abortion business, plays a main role in perpetuating this impact. By PP performing abortions in Louisiana for the first time, they will bring Louisiana closer to the national statistic of 1 in every 2.7 black pregnancies ending in abortion.

Abortion's Impact on the Black Community

12.6% of Population, but 30% of All Abortions

Even though African Americans are only 12.6% of the population, 30% of the 1.2 million abortions in 2008 were performed on black babies. This resulted in 360,000 black babies lost to abortion in 2008, at a rate of nearly 1,000 per day (Guttmacher Institute, Facts on Induced Abortion in the United States, August 2011).

Leading Cause of Death Nationally Among Black Community | Deaths Outweigh Births

Abortion is the leading cause of death among African-Americans in the United States. Abortion brings an end to more black lives than all other causes of death combined, more than heart disease, violent death, or cancer.

In 2008, there were 363,705 abortions in the black community. According to the Planned Parenthood affiliated Guttmacher Institute, this number represents 30% (the percentage of black abortions) of the nation's 1,212,350 abortions in 2008.^{xix} All other causes of death among African-Americans amounted to 285,522.^{xx}

When abortion is included in the number of deaths in the black community, death outweighs life. The 649,227 annual deaths in the black community, which includes all induced abortions, outnumber the 623,029 annual births.

1 in 7 Louisiana Minority Pregnancies End in Abortion

Of total expected live births in Louisiana's minority population, 14.9% end in abortion, or 1 in 7 are aborted. These numbers were derived from a combination of the CDC's preliminary 2011 vital statistics for Louisiana and preliminary Louisiana Department of Health and Hospitals' abortion reports for 2011. DHH only accounts for abortion in terms of "White" and "non-White".

1 in 2.7 Black Pregnancies End in Abortion

In 2008, 623,029 "non-Hispanic black" babies were born in the U.S.^{xxi} In 2008, 63,705 abortions were



performed on “non-Hispanic black” women.^{xxii} These statistics show that 36% of black pregnancies end in abortion, or 1 in every 2.7 pregnancies.

Planned Parenthood's Role

Margaret Sanger, Founder of Planned Parenthood, Advocated Eugenics

Margaret Sanger founded the American Birth Control League in 1921, which was renamed Planned Parenthood in 1943. Margaret Sanger, whose many writings and speeches show her desire to weed out "inferior" or "genetically unfit" populations, was a strong advocate for negative eugenics.

Sanger's campaign and social philosophy were aligned as she worked to target those she considered as being "genetically unfit." This social intervention took on the practices of selective breeding, sterilization, and other ways for moderating the number of children born to those groups she deemed "unfit." Sanger stated in an article "a stern and rigid policy of sterilization and segregation to that grade of population whose progeny is already tainted or whose inheritance is such that objectionable traits may be transmitted to offspring."^{xxiii}

Sanger's focus on eugenics was clearly presented in her involvement of planning the First World Population Conference that took place in Geneva in 1926. She was not mentioned on the actual program, but instead worked behind the scenes and initiated the "Negro Project" in 1939.

Sanger supported direct government coercion of sterilization:

“It now remains for the United States government to set a sensible example to the world by offering a bonus or a yearly pension to all obviously unfit parents who allow themselves to be sterilized by harmless and scientific means. In this way the moron and the diseased would have no posterity to inherit their unhappy condition.... [A]sk the government to first take off the burdens of the insane and feebleminded from your backs. Sterilization for these is the remedy.”^{xxiv}

Even with all that is known about Sanger's views and actions, Planned Parenthood continues to publicly hail Sanger as a hero. In fact, the highest honor given by Planned Parenthood each year, the Planned Parenthood Federation of America Margaret Sanger Award, is named after their founder.

For more in-depth information, please visit MargaretSanger.net, which contains information and quotes about Margaret Sanger compiled by Dr. Angela Franks. Dr. Franks wrote one of the best and most in-depth accounts of Sanger's eugenics in *Margaret Sanger's Eugenic Legacy: The Control of Female Fertility*. It can be obtained from Amazon.com

79% of Planned Parenthood Abortion Facilities Near Minority Neighborhood

2010 Census results reveal that Planned Parenthood is targeting minority neighborhoods. It has located 79% of its 165 surgical abortion facilities within walking distance of African American or Hispanic/Latino neighborhoods. Planned Parenthood located 62% of its abortion facilities within 2 miles of African American neighborhoods, and 64% near Hispanic or Latino neighborhoods, thus establishing them as "targeted neighborhoods."^{xxv}



Accepting Contributions for Black Abortions

In 2008, Lila Rose, 19-year-old sophomore at UCLA, exposed the truth about Planned Parenthood through legally recorded calls to Planned Parenthood facilities. Clinics in Ohio, Oklahoma, Idaho and New Mexico have all been captured on tape willfully accepting donations from a donor that designated the money be spent to abort a black child. The audio of the calls attest to the fact that Planned Parenthood was willing to accept money earmarked for abortions on a specific race. Video of these calls can be found online ^{xxvi}.

- Maafa 21: In-depth Documentary on Eugenics in America and Planned Parenthood’s Role

Who is Planned Parenthood Gulf Coast?

From Planned Parenthood Gulf Coast (PPGC) website:

“In 2005, Planned Parenthood of Houston and Southeast Texas (PPHSET) entered a management agreement with Planned Parenthood of Louisiana and the Mississippi Delta (PPLAMD). PPLAMD had been operating health centers in Louisiana since 1984. In 2010, the two affiliates officially merged and became Planned Parenthood Gulf Coast, Inc. (PPGC). Planned Parenthood Gulf Coast now serves 35 counties in Southeast Texas and the entire state of Louisiana. PPGC operates 12 health centers – 7 in the Houston area, 3 in Southeast Texas and 2 in Louisiana.”^{xxvii}



In May 2010, PPGC opened their six-story “Prevention Park” facility in Houston,^{xxviii} the largest free-standing abortion facility in the United States. PPGC is PP’s fourth-largest affiliate in the nation.

In 2003, the Texas Legislature changed state law to require Planned Parenthood to establish separate corporations for providing family planning services and abortion services. Since that time, the spin-off corporations of "Planned of Southeast Texas Surgical and Comprehensive Health Services" and "Planned Parenthood Center for Choice Inc" were created to handle the abortion services for Planned Parenthood Gulf Coast.^{xxix}

As of January 2013, PPGC and associated corporations operate three abortion facilities in Southeast Texas.^{xxx} The PPGC Annual Reports from 2010 and 2011 show the following with respect to abortion:

- In 2011, PPGC and associated corporations "provided 12,520 visits for abortion care and vasectomy services" at their three abortion locations.^{xxxi}
- In 2010, PPGC and associated corporations "provided 12,503 visits for abortion care and vasectomy services" at their three abortion locations.^{xxxii}

In 2009, the PPGC Annual Report showed that they “provided 8,274 abortions and 81 vasectomies”.^{xxxiii} The 2009 numbers indicate that the vast majority of the 2010 and 2011 numbers are abortions rather than vasectomies.

PPGC’s two current facilities in Louisiana (New Orleans and Baton Rouge) do not currently perform abortions. Through legislative testimony and their [own printed material](#)^{xxxiv}, it has been established that PP will perform abortions at the Claiborne Avenue facility.

Two Pending Lawsuits Allege Medicaid Fraud by PPGC

Two “False Claims” lawsuits have been filed against Planned Parenthood Gulf Coast (PPGC) and are pending. In the first lawsuit, alleged by Ms. Karen Reynolds (detailed below), the federal district court has found sufficient evidence for the case to move forward and rejected Planned Parenthood’s attempt to have this case summarily dismissed

According to allegations of Ms. Abby Johnson, detailed on the downloadable report, PPGC improperly received over \$5 million in taxpayer funding through its fraudulent billing scheme.

If these allegations are upheld in federal court, for Planned Parenthood, “right” appears to be synonymous



with what is best for its bottom-line, not what is legal, fiscally responsible, or in the best interest of America's women and girls.

- **Ms. Karen Reynolds** (a “Health Center Assistant” at PPGC for nearly a decade) alleges that PPGC’s “employees routinely altered the chart to match the bill” where “a patient’s chart did not contain documentation to support services marked on the bill.”

Falsifying information on patients’ charts was the corporate policy of Planned Parenthood, according to Ms. Reynolds. It was not mere oversight or the work of rogue employees. In an effort to evade detection of improper and fraudulent billing practices and failure to comply with the law, PPGC employees were allegedly trained to “fix” its charts—specifically, to remove or alter information relevant to claims submitted to the government for reimbursement.

Ms. Reynolds, who worked at PPGC for almost ten years, states that PPGC routinely “fixed” charts. In her experience, Ms. Reynolds estimates that:

“[A]pproximately 1/3 of the patient files would contain charges on the super bill^{xxxv} with no underlying documentation in the patient’s chart to indicate the corresponding service was ever performed.”^{xxxvi}

According to Ms. Reynolds, when a bill did not reflect the services documented in a patient’s chart, employees were instructed to “fix” the chart to match the bill.^{xxxvii} This was, according to Ms. Reynolds, “standard practice at PPGC clinics” during the entire time of her employment.

That “standard practice” of doctoring charges, as Ms. Reynolds contends, was an intentional corporate policy. “PPGC trained its employees to create false and misleading patient chart entries” in order to support reimbursements for services which were not permitted under the Texas Women’s Health Program (WHP) or Medicaid, including “obtaining payment for abortion-related services.”^{xxxviii}

In August 2012, a federal district court found that the facts as alleged by Ms. Reynolds “create a plausible claim for relief” under both the federal False Claims Act and the Texas Medicaid Fraud Protection Act.^{xxxix} The court rejected Planned Parenthood’s attempt to have this case summarily dismissed. It will now proceed to trial.

- Shortly after Ms. Reynolds filed her lawsuit against PPGC, **Ms. Abby Johnson** brought another “whistleblower” suit against PPGC with allegations of chart “fixing” that buttress Ms. Reynolds’ claims.

Ms. Johnson, who worked at PPGC’s Bryan Clinic in Bryan, Texas from September 2001 until she resigned in October 2009 (part of that time as the clinic director), similarly details that Planned Parenthood employees were expected to and did alter information on patient charts to conceal its failure to comply with the law.^{xl}

Ms. Johnson recounts the existence of a systemic chart-fixing scheme at PPGC clinics. Her complaint states that PPGC would “pre-select” and “purge” its client files to make them appear to be in compliance with state and federal law and regulations.^{xli} Ms. Johnson alleges that where disparities existed between billing documents and patient charts, PPGC employees “were instructed by members of [PPGC’s] Key Management Team^{xlii} ...to ‘make it right’ by fixing charts before auditors arrived.”^{xliii}

Notably, Ms. Johnson relates that even after clinic managers were made aware that PPGC was improperly billing the Texas WHP program for products and services not covered under that program, she and other managers were “instructed...to *continue* to seek Texas WHP-eligible reimbursements by *falsely notating* the patient charts of women with infections to indicate that

Texas WHP-eligible services had been provided, when, in fact, Texas WHP-eligible services had not been provided to such women.”^{xliv}

In addition to altering patient charts to hide improper and fraudulent billing practices, Ms. Johnson alleges that because PPGC knew about its “audits in advance,” it altered its charts to cover up their failure to comply with state laws and policies designed to protect minors and vulnerable women, such as Texas’ parental consent law.

Ms. Johnson alleges that members of Planned Parenthood’s Key Management team instructed PPGC staff to provide auditors with charts that had been “fixed” to ensure that “required documentation, especially with regard to parental consent and non-coercion, was included in each client file.”^{xlv} Such a disregard for parental involvement and non-coercion laws endangers the health and safety of America’s women and young girls.



Map: Three lots marked “PP” indicated Planned Parenthood Property.



Drawing of Proposed Planned Parenthood Abortion Facility

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Current photo of a portion of Planned Parenthood (PP) property with dilapidated building that will have to be demolished.

ⁱ The Guttmacher Institute reported “some 1.21 million abortions” in 2008 (<http://www.guttmacher.org/media/presskits/abortion-US/statsandfacts.html>). In 2008, Planned Parenthood performed 324,008 abortions, consisting of 27% of the national abortion total. (PPFA 2008-2009 Annual Report).

ⁱⁱ Planned Parenthood Federation of America (PPFA) 2011-2012 Annual Report, p.4.

ⁱⁱⁱ Planned Parenthood (PP) Abortion Figures Compiled from PP Annual Reports. National abortion figures compiled from Guttmacher Institute.

^{iv} PPFA 2011-2012 Annual Report, p.5.

^v PPFA 2011-2012 Annual Report, p.5.

^{vi} Every year, American Life League’s STOPP Initiative identifies the physical location of every PP facility in the country. They shared long-term figures with our coalition. The report of their 2011 findings can be found at http://www.stopp.org/pdfs/2011/2011_Survey_of_Planned_Parenthood_Facilities.pdf

^{vii} PPFA 2005 Annual Report, p. 6: http://www.lifeissues.org/pp/report_05-06.pdf

^{viii} PPFA 2011-2012 Annual Report, p.5.

^{ix} PPFA 2005 Annual Report, p. 6: http://www.lifeissues.org/pp/report_05-06.pdf

^x PPFA 2011-2012 Annual Report, p.5.

^{xi} 2000 PPFA Annual Report (not available online)

^{xii} PPFA 2011-2012 Annual Report, p.8

^{xiii} PPFA 2011-2012 Annual Report, p.7.

^{xiv} PPFA 2011-2012 Annual Report, p.9

^{xv} Guttmacher Institute reports median charge for a 10-week surgical abortion at \$470. <http://www.guttmacher.org/in-the-know/abortion-costs.html> (Last visited on March 17, 2013).

^{xvi} In the 2008-2009 Annual Report, “Health Center Income” was reported separately from “Government Grants and Contracts”. Beginning in 2009-2010, PP Annual Reports separated revenue into “Non-Governmental Health Services Revenue” and “Government Health Services Grants and Reimbursements.”

^{xvii} From the 2011-2012 Annual Report, PP received \$311.5 million in “non-governmental health services income” and 542.4 in “governmental health services grants and reimbursements”. Combined, you have \$853.9 million in all health services income. The \$157 million income from abortion represents 18% of this total health services income.

^{xviii} Statistics and analysis partly through Keith Riler

^{xix} 2008 Guttmacher Abortion Statistics (click on PREGNANCIES, BIRTHS AND ABORTIONS tab): <http://www.guttmacher.org/datacenter/profiles/US.jsp>

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- xx “2008 FINAL DEATH DATA”, Centers for Disease Control, Table 13, pp. 55-57
http://www.cdc.gov/nchs/data/nvsr/nvsr59/nvsr59_10.pdf
- xxi CDC figures http://www.cdc.gov/nchs/data/nvsr/nvsr59/nvsr59_01.pdf Page 65
- xxii Guttmacher Institute, <http://www.guttmacher.org/datacenter/profiles/US.jsp>, click on PREGNANCIES, BIRTHS AND ABORTIONS tab):
- xxiii Margaret Sanger, "A Plan for Peace," *The Birth Control Review*, April 1932, 107
- xxiv Margaret Sanger, "The Function of Sterilization," *Birth Control Review*, Oct. 1926, p. 299, emphasis added
- xxv See the map of the targeting across the nation at http://www.protectingblacklife.org/pp_targets/index.html Data From "Protecting Black Life" <http://www.protectingblacklife.org/pdf/PP-Targets-10-2012.pdf>
- xxvi <http://www.liveaction.org/the-planned-parenthood-racism-project/>
- xxvii FAQ Page from PPGC Website (<http://www.plannedparenthood.org/gulf-coast/faq-36655.htm>). Obtained on March 17, 2013).
- xxviii Houston Chronicle, May 21, 2010. <http://www.chron.com/life/mom-houston/article/Planned-Parenthood-debuts-new-building-1717914.php>
- xxix [2009-2010 PPGC Annual Report](#), p. 4 small text near bottom of page http://www.plannedparenthood.org/gulf-coast/files/Gulf-Coast/AR_2010_pub_Layout_1.pdf
- xxx PPGC / PP Center for Choice Inc Abortion Facilities located in Bryan, Houston, and Stafford, TX. <http://www.plannedparenthood.org/setexas-abortion/abortion-41059.htm>. Obtained March 17, 2013.
- xxxi 2010-2011 PPGC Annual Report, p. 4. http://www.plannedparenthood.org/gulf-coast/images/FY_11_Annual__external.pdf
- xxxii 2009-2010 APPGC Annual Report, p. 4
- xxxiii 2008-2009 PPGC Annual Report, p. 3
- xxxiv In the “New Orleans Health Center Capital Campaign Case for Support” Document, PPGC states “provide access to medically-safe abortion procedures” as a goal. p. 2.
- xxxv A “super bill” is an itemized form used by healthcare providers for reflecting rendered services to be submitted to payers (insurances, funds, programs) for reimbursement.
- xxxvi Third Amended Complaint at 21, United States and Texas ex rel Reynolds v. Planned Parenthood Gulf Coast, No. 9-09-cv-125 (E.D. Tex. Oct. 28, 2011).
- xxxvii Reynolds Complaint at 21.
- xxxviii *Id.* at 15.
- xxxix See *Reynolds v. Planned Parenthood*, (E.D. Tex. Aug. 10, 2012) available at <http://c0391070.cdn2.cloudfiles.rackspacecloud.com/pdf/reynolds-motion-to-dismiss-order.pdf> (last visited Oct. 17, 2012).
- xl Alleged violation of the False Claims Act, 31 U.S.C. § 3729(a)(1)(A), (B), and (G) and the Texas Medicaid Fraud Prevention Act, Tex. Hum. Res. Code Ann. § 36.002(1), (2), (4)(B), and (12).
- xli Second Amended Complaint at 35, *United States and Texas ex rel Johnson v. Planned Parenthood Gulf Coast*, No. CV-H-cv-3496 (S.D. Tex. Dec. 20, 2011).
- xlii Ms. Johnson’s complaint identifies “Planned Parenthood’s Key Management Team” as PPGC’s authorized officers, managers, and agents including Melaney Linton, PPGC’s Chief Operating Officer; Laurie McGill, PPGC’s Vice President; Bonnie Smith, PPGC’s Vice President of Medical Services; Sandra Smolensky, PPGC’s Regional Director of Medical Services; and Dyann Santos, PPGC’s Regional Director of Medical Services.
- xliii Johnson Complaint at 37.
- xliv *Id.* at 36.
- xlv *Id.* at 37.