

Memo

TO: Interested Parties
DATE: 4 November 2024
RE: Anti-Choice Leaders Are Mobilizing Thousands of Unregulated Pregnancy Clinics Against Abortion Access Ballot Initiatives

National anti-choice leaders and funders are unleashing the \$1.7 billion unregulated pregnancy clinic industry to aggressively thwart abortion rights ballot initiatives nationwide.

Campaign spending reporting for the 2024 abortion-related ballot initiatives has focused on committee campaign electoral finance reports. But, beneath the surface of electoral finance reports lies a powerful and deeply coordinated network of thousands of pro-life organizations, quietly but fiercely mobilizing. With a staggering \$1.7 billion in annual revenue, an estimated 3,000 locations, and 100,000 reported staff and volunteers, the unregulated pregnancy clinic (UPC) industry forms the grassroots backbone of the anti-choice movement.

In the 2024 election cycle, this network is being strategically leveraged by extremist organizations including Heartbeat International, Susan B. Anthony List, Turning Point USA, Students for Life, and others. Operating behind the scenes, UPCs are used to influence state policies, undermine reproductive rights, and reshape the political landscape, all while presenting themselves as harmless community resources.

Examples of UPC industry/anti-choice leader collaborations in the 2024 election include:

1. **HEARTBEAT INTERNATIONAL IS A NATIONAL ANTI-ABORTION ORGANIZATION WITH A NETWORK OF OVER 3,000 UNREGULATED PREGNANCY CENTERS (UPCS)** across the U.S. and globally. Forms 990 suggest UPCs in the Heartbeat International network make up more than \$852 Million in annual revenue. Heartbeat International offers its affiliates training, templates, guidance, networking, and connections to anti-choice legal support and elected officials. Heartbeat actively engages in anti-abortion advocacy at both state and federal levels, frequently filing amicus briefs in abortion-related cases, such as *Dobbs v. Jackson Women's Health Organization*.

At the May 2024 national Heartbeat International conference, attended by 2,000 UPC leaders, **South Dakota** Representative and attorney Jon Hansen led a training titled "State Level Political Involvement as a 501(c)(3) Non-Profit". The session

highlighted Leslee Unruh, the controversial founder of the Sioux Falls-based Alpha Center, as a model for how other Heartbeat International affiliates could engage in political activities within their states, focusing on her leadership in legal and organizing efforts to thwart Amendment G, the Constitutional Right to Abortion. **Video footage of the training session shows Rep. Hansen outlining the legal avenues available for UPCs as 501(c)(3) organizations to participate in lobbying, emphasizing abortion-related ballot measures as a key venue for UPCs to influence state politics.** Hansen advised Heartbeat International conference attendees that a 501(c)(3) UPC could put “*no more than between 5-15% of an organization’s total activities*” toward lobbying and campaign activity.

Heartbeat International also hosts information on how to engage in abortion-related ballot initiatives on its website including an “opposition strategy”; suggests contacting state UPC networks in **Colorado, Florida, Maryland, and New York** to engage in advocacy opposing abortion care ballot initiatives; provides resources on “get out the vote” efforts; and advises on messaging and countering ballot initiatives to allow access to abortion care.

2. **SUSAN B ANTHONY LIST IS A NATIONAL ANTI-CHOICE ORGANIZATION THAT WORKS TO ELECT ANTI-CHOICE CANDIDATES TO OFFICE** (including candidates that liken pregnancy after rape to a gift from God and believe victims should “make the best out of a bad situation”) and advance extremist anti-choice state and national policy. It is funded by anti-choice billionaires including Leonard Leo’s network and Dick Uihlein. The organization has pledged to raise and spend \$92M during the 2024 election cycle. In January 2024, Susan B Anthony List addressed the media regarding its 2024 political strategy, noting its main focus on promoting, mobilizing, and increasing funding for the UPC industry. In the states, **Nebraska** Governor Pillen (R) and Susan B Anthony List President Marjorie Dannenfelser have collaborated to activate the state’s UPC industry to engage in 2024 election efforts.
3. **TURNING POINT USA IS A PHOENIX-BASED EXTREMIST ORGANIZATION LED BY CHARLIE KIRK THAT HAS RAISED MILLIONS OF DOLLARS FROM CONSERVATIVE DONORS** and been a leader in Republican politics (Turning Point USA reported FY 2023 revenues of \$81M; Turning Point Endowment reported FY 2023 assets of \$61M; donors include funds connected to Leonard Leo). Turning Point USA and UPC industry collaborations include rallies with Charlie Kirk in Amarillo, **Texas** hosted by Hope Choice Pregnancy Centers and Mentoring Programs, and in **Arizona** with the multi-location UPC network “Choices Medical Center” (run by the same person behind the Arizona high court’s decision to reinstate the state’s 1864 abortion ban).
4. **THE THOMAS MORE SOCIETY IS A RIGHT-WING, ANTI-CHOICE LEGAL ORGANIZATION THAT PROMOTES “CHRISTIAN VALUES” WITHIN THE LEGAL SYSTEM**, supported by conservative funders including the Katherine James Foundation, Uihlein Foundation, and funders connected to Koch and Leonard Leo. They have represented some of the most extreme anti-choice activists, fought to

make it legal to incite violence against abortion providers, and have been heavily involved in efforts to block the ACA's contraception coverage mandate. In **Missouri**, Thomas More Society represented Heartbeat International affiliate St. Louis maternity home Our Lady's Inn's failed attempt to block the state's pro-choice ballot initiative. In **Nebraska**, Thomas More Society represented Carolyn LaGreca, the founder of the Women's Care Center (a 501c3, with 36 locations across 12 states) in an Omaha lawsuit to block the 439 Right to Abortion initiative from appearing on the ballot.

5. **CHOOSE LIFE MARKETING IS "AN EXTREMIST ANTI-ABORTION BUSINESS** that provides marketing and digital services to anti-abortion centers, organizations and businesses across the U.S. and the world". The Missouri-based firm specializes in marketing services for the UPC industry and operates across all 50 states. Recently, it was highlighted in a report by the Center for Countering Digital Hate, which identified the agency as a contributor to Google's estimated \$10.2 million in revenue generated from UPC ads over the past two years. Choose Life Marketing is working with UPCs to produce ads supporting anti-choice candidates as well as anti-choice ballot initiative content in **Florida** and **Missouri**.

In **Colorado**, Marci Little, the registered agent for the "Coloradans for the Protection of Women and Children," is a Creative Director for Choose Life Marketing: "*She has years of experience working with pregnancy centers. Marcie served as the digital marketing director for Life Network in Colorado Springs and as the communications director at Save the Storks. Because of her first-hand knowledge, she truly understands a center's operating procedures, their need for exceptional marketing, and the hearts of staff and clients.*"

6. **INDIVIDUAL UPCS ARE ACTIVELY CAMPAIGNING AGAINST ABORTION RIGHTS BALLOT INITIATIVES.** These 501(c)(3) organizations, almost all affiliated with Heartbeat International, have led legal challenges aimed at keeping abortion rights initiatives off the ballot in Missouri, Nebraska, and South Dakota and, as the election nears, they are actively campaigning against their passage in: **Arizona** (ex: New Hope Pregnancy Resource Center, New Life Pregnancy Center), **Colorado** (ex: The Colorado Pregnancy Care Alliance), **Florida** (ex: Pregnancy Care Center of Plant City, Pregnancy Care Center, Pregnancy Center of Panama City which is also auctioning a "custom-built Trump rifle" as a fundraiser), **Maryland** (ex: Pregnancy Center North, also known as Towson Women's Care), **Missouri** (ex: Monarch Family Resource Center, Riverways Pregnancy and Family Resource Center), **Montana** (ex: Montana Pregnancy Care Center), **Nebraska** (ex: Beginnings), **Nevada** (ex: First Choice Pregnancy Services), **New York** (ex: Pregnancy Care Center of New York, Compass Care), and **South Dakota** (ex: Alpha Center, Rapid City Black Hills Pregnancy Center).

**Unregulated pregnancy clinics (UPCs) are non-profit organizations, primarily aligned with national anti-abortion groups such as Care Net, Heartbeat International, and NIFLA. These clinics offer limited services like pregnancy counseling, material aid (e.g., diapers, clothing), and claim to provide medical support, including pregnancy tests and ultrasounds. However, as they are not classified as medical facilities and provide free services, their clients are not protected by the health, safety, or privacy regulations governing medical clinics.*

Appendix 1: UPC Reported Expenses 2019-2022 in States With 2024 Abortion-Related Ballot Initiatives (see www.UPCFinanceWatch.com for more information).

State	2019 Expenses	2020 Expenses	2021 Expenses	2022 Expenses	2019-2022 Expenses Total	Total Staff (2022)	Total Volunteers (2022)
AZ	\$20,061,700	\$20,150,550	\$20,145,423	\$22,596,271	\$82,953,944	447	2,890
CO	\$47,392,214	\$50,650,544	\$56,396,161	\$65,993,659	\$220,432,578	1,216	4,261
FL	\$56,351,267	\$53,821,176	\$58,062,476	\$63,127,379	\$231,362,298	1,273	2,424
MD	\$8,037,154	\$7,434,686	\$7,929,473	\$8,456,502	\$31,857,815	183	903
MO	\$21,735,911	\$23,426,228	\$23,788,785	\$28,056,388	\$97,007,312	446	1,678
MT	\$3,619,588	\$3,268,536	\$3,624,852	\$3,787,702	\$14,300,678	77	138
NE	\$4,067,286	\$4,306,376	\$4,978,978	\$5,658,989	\$19,011,629	109	293
NV	\$3,080,791	\$3,033,655	\$3,549,182	\$3,727,414	\$13,391,042	55	330
NY	\$124,229,006	\$94,380,093	\$53,596,023	\$63,520,964	\$335,726,086	267	1,885
SD	\$1,625,979	\$1,568,782	\$1,829,079	\$2,265,163	\$7,289,003	45	252
Total	\$290,200,896	\$262,040,626	\$233,900,432	\$267,190,431	\$1,053,332,385	4,118	15,054

Appendix 2: Examples of Publicly-Funded UPCs Engaging in Electoral Activity

ARIZONA

- **Choices Pregnancy Center of Greater Phoenix** (EIN 86-0536082), a Heartbeat International affiliate, has a partnership with anti-choice political organization Turning Point USA, authored official arguments against Prop 139 circulated by the AZ Secretary of State, CEO Marc Burmich claims Choices is mobilizing voters at churches against Prop 139 and to engage in local politics, Choices reported \$582,232 in taxpayer government grants 2023 Form 990.

COLORADO

The Colorado state legislature does not directly appropriate taxpayer dollars to UPCs. However, some CO UPCs engaged in the 2024 election have received taxpayer dollars from federal and/or local government programs. For example,

- Executive Director Rich Bennet of **Colorado Springs Pregnancy Center** (EIN 84-0970592), a Heartbeat International affiliate, is listed on the CO Secretary of State's ballot initiative information website as a lead opponent of Initiative #89/Amendment 79 and as the **leader of "Know the Truth on 79."**
 - On its Form 990, Colorado Springs Pregnancy Center reported "government grants" totaling \$2,179,743 between FY 2020 and FY 2023.
- Executive Director Tamra Axworthy of **A Caring Pregnancy Center** (EIN: 74-2392820), a Heartbeat International affiliate, lobbied against ballot language for Initiative 89. Axworthy is also one of the founding members of the conservative Christian political group "Forging Pueblo," a network of extremist organizations working to elect local candidates and influence local policy. Additionally, she is headlining an Amarillo, Texas anti-choice event targeting "women voters" on October 17, 2024.
 - Heartbeat International Executive Director Jor-el Godsey headlined A Caring Pregnancy Center's September 2024 fundraiser, with over 700 attendees.
 - A Caring Pregnancy Center has received grants from Pueblo City county council: *"Since 2020 there was \$5,000, 2021 \$17,000, 2022 \$38,000, 2023 there was \$30,000, and just this year they were given \$36,000."*
- **Pro-life Colorado**, the organization behind the Right to Know Colorado - No on 79 campaign, is a coalition of 50 anti-choice organizations in CO including UPCs A Caring Pregnancy Center (HBI affiliate), Alternatives Pregnancy Center (HBI affiliate), Bella Health + Wellness, Life Decisions, Life Network Colorado Springs (HBI affiliate), Resource Center Greeley (HBI affiliate).

FLORIDA

In 2023, the Florida state legislature increased the state's yearly appropriation of taxpayer dollars to UPCs from \$4.5 million to \$29.5 million. Several UPCs advocating against Florida's abortion rights ballot initiative, Amendment 4, receive public funding.

- Medical Director Mary Jo O'Sullivan of **Heartbeat of Miami** (EIN 20-8155890), a Heartbeat International affiliate, serves as the Chairperson of Florida Voters Against

Extremism, which has raised over \$2.8 million in its campaign against Amendment 4. O’Sullivan also published an op-ed in the South Florida Sun Sentinel urging the state Supreme Court to block Amendment 4 from appearing on the 2024 ballot.

- Heartbeat of Miami received a grant of \$342,621 from Florida Pregnancy Care Network, Florida’s taxpayer funding grantmaking intermediary, in FY 2023, and on its 2023 Form 990, it reported a total of \$514,595 in taxpayer government grants.
- **Pregnancy Care Center of Plant City** (EIN 59-3139161), a Heartbeat International affiliate, has been organizing against Florida’s abortion ballot initiative. Pregnancy Care Center of Plant City received a grant of \$84,219 from Florida Pregnancy Care Network, Florida’s taxpayer funding grantmaking intermediary, in FY 2023, and on its 2022 Form 990, it reported a total of \$181,407 in taxpayer government grants.
- **Pregnancy Resource Center of Panama City** (EIN 59-2554673), a Heartbeat International affiliate auctioning a “custom-built Trump rifle” as a fundraiser, is encouraging people to vote no on Amendment 4. Pregnancy Resource Center of Panama City claimed \$435,760 in taxpayer government grants on its 2023 Form 990.

MISSOURI

In 2023, the Missouri state legislature increased the state’s yearly appropriation of taxpayer dollars to UPCs from \$6.4 million to \$8.3 million. Several UPCs advocating against Missouri’s abortion rights ballot initiative, Amendment 3, receive public funding.

- **Our Lady’s Inn**, a maternity home that collaborated with Thomas More Society on a lawsuit that attempted to block Amendment 3 from appearing on the ballot, received a grant of \$345,815 from Alliance for Life Missouri, Missouri’s taxpayer funding grantmaking intermediary, in FY 2022. On its 2023 Form 990, the organization reported a total of \$1,610,315 in taxpayer government grants. Our Lady’s Inn is an affiliate of Heartbeat International.
- **Riverways Pregnancy and Family Resource Center**, which has been raising funds to oppose Missouri’s Amendment 3, received \$39,157 from Alliance for Life Missouri, Missouri’s taxpayer-funded grantmaking intermediary, in FY 2022. On its 2023 Form 990 it reported a total of \$60,673 in taxpayer government grants. Riverways Pregnancy and Family Resource Center is an affiliate of Heartbeat International.
- **Monarch Family Resource Center**, advocating against Amendment 3, reported receiving \$8,025 in taxpayer government grants on its 2023 Form 990. Monarch is an affiliate of Heartbeat International.

SOUTH DAKOTA

- **Alpha Center’s** Executive Director Leslee Unruh is the co-chair of the Life Defense Fund, a campaign set up to oppose Amendment G, the Constitutional Right to Abortion, The campaign has launched legal actions to kick the initiative off the ballot, circulated misleading campaign materials, and is mobilizing volunteers. Alpha Center was the recipient of unspent funds from Governor Noem’s (R) campaign and reported receiving \$87,500 in taxpayer government grants on its 2021 Form 990. Alpha Center is an affiliate of Heartbeat International.