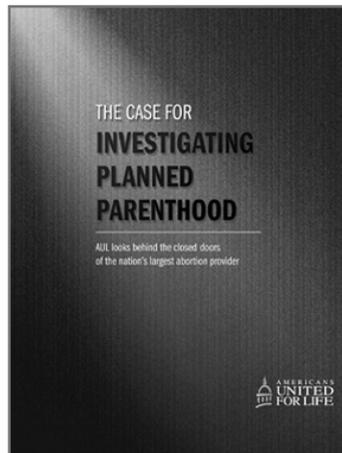


The Fight to Investigate and De-fund Planned Parenthood, America's Largest Abortion Provider

2011 was marked by federal and state efforts to de-fund the abortion industry, whose largest provider is Planned Parenthood. At least three factors paved the way for renewed focus. First, the November 2010 elections generated large pro-life gains at both the state and the federal level. Second, in January 2011, a Pennsylvania grand jury report exposed the horrors of Kermit Gosnell's clinic in Philadelphia, demonstrating that the "legal" abortion industry is the true "back-alley" of America. Third, also in January 2011, the organization Live Action released a series of videos exposing new scandals at Planned Parenthood, including an apparent willingness to aid sex trafficking.

Adding fuel to the fire, Americans United for Life released a groundbreaking report in July 2011, *The Case for Investigating Planned Parenthood: AUL looks behind the closed doors of the nation's largest abortion provider* (AUL Report). A product of the AUL legal team reviewing over 20 years of Planned Parenthood's reports and promotional material, audit reports and financial statements, as well as primary source material from investigations into and charges made against Planned Parenthood and its affiliates across the nation, the AUL report substantiates, synthesizes, and gives clear direction for the case against Planned Parenthood.



THE CASE FOR INVESTIGATING AND DE-FUNDING PLANNED PARENTHOOD

The Planned Parenthood Federation of America (PPFA) advertises itself as “the nation’s most trusted provider of sexual and reproductive health care.”¹ Although polls show Planned Parenthood has been, to a large degree, successful in its public relations campaign, the AUL Report documents the centrality of abortion to Planned Parenthood’s business model, its misuse of federal funding, its disregard for the health and safety of women and minors, and its systemic and organization-wide pattern of violating federal and state laws.

Since 1970—when Planned Parenthood opened its abortion business on the first day permitted by New York law—it has performed well over 5 million abortions, and it is now on pace to perform over a million abortions every three years. Increasing its abortion numbers every year, Planned Parenthood has defied the national trend of a declining abortion incidence since the 1990s. PPFA has also issued a new mandate that every Planned Parenthood affiliate must have at least one clinic performing abortions by 2013.²



Planned Parenthood and its supporters often downplay the significance of abortion as only 3 percent of its “services.”³ However, PPFAs literature acknowledges that 12 percent of its health care patients receive abortions.⁴ Moreover, using Planned Parenthood’s lowest advertised prices, at a minimum, abortion represented \$114.9 million of the \$404.9 million Planned Parenthood reported as “clinic income” in the fiscal year ending June 30, 2009.⁵ It is also clear that abortion is a steadily increasing percentage of Planned Parenthood’s “clinic income.”⁶

In addition, Planned Parenthood’s pregnancy-related “services” for its pregnant clients are overwhelmingly abortions. For every adoption referral Planned Parenthood affiliates make, they perform 340 abortions.⁷ Including its relatively few prenatal clients, abortion represented over 97 percent of Planned Parenthood’s pregnancy-related services in 2009. This disparity between abortions and other pregnancy-related services has increased annually since at least 1996.⁸

Increasingly abortion-centric, Planned Parenthood receives millions of dollars annually from the federal government. There exists clear Congressional intent that the two largest sources of federal funding for Planned Parenthood—Medicaid and Title X—are not to be used in support of abortion.⁹ However, Abby

Johnson, the former director of a Planned Parenthood affiliate in Bryan, Texas, has stated, “As clinic director, I saw how money received by Planned Parenthood affiliate clinics all went into one pot at the end of the day—it isn’t divvied up and directed to specific services.”¹⁰

Additionally, Planned Parenthood affiliates in multiple states have been exposed for overbilling government healthcare programs. For example, in 2004, a California Department

**As clinic director, I saw how money received by Planned Parenthood affiliate clinics all went into one pot at the end of the day – it isn’t divvied up and directed to specific services.
-Abby Johnson, former director of a Planned Parenthood affiliate in Bryan, Texas**

of Health Services audit report showed that Planned Parenthood of San Diego and Riverside Counties overbilled the Medicaid program in excess of \$5 million in one year.¹¹ In the “whistleblower” case,

Gonzalez v. Planned Parenthood, the former Vice President of Finance and Administration with Planned Parenthood of Los Angeles estimated that over a 6-year period Planned Parenthood affiliates in California overbilled Medicaid by \$180,000,000.¹²

Over the years, PPFAs and its affiliates have also demonstrated a pattern and practice of violating laws designed to protect minors, such as parental involvement laws for abortion and mandatory reporting laws for child sexual abuse and statutory rape. For example, in 2009, the Alabama Department of Public Health issued a report stating that Planned Parenthood staff at a Birmingham, Alabama abor-



tion clinic “failed to obtain parental consent for 9 of 9 minor patients in a manner that complies with state legal requirements.”¹³

The AUL Report documents these and other scandals and abuses at Planned Parenthood. In short, the facts do not show that Planned Parenthood is deserving of \$363 million a year of Americans’ tax dollars. Rather, Americans deserve a thorough investigation of Planned Parenthood.

FEDERAL EFFORTS TO INVESTIGATE AND DE-FUND PLANNED PARENTHOOD IN 2011

Congressional Actions to De-fund Planned Parenthood

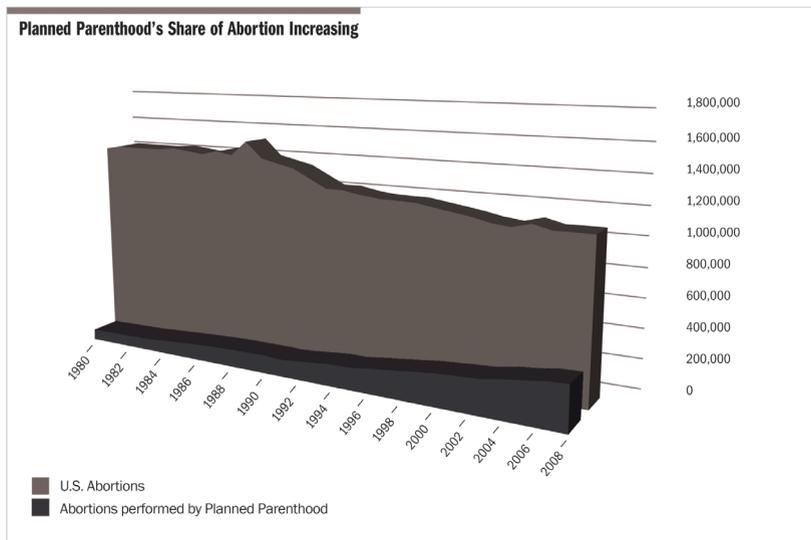
Each year since 2007, Representative Mike Pence (R-IN) has introduced bills and amendments to end the federal funding of abortion providers. With the strong pro-life majority

Americans elected to Congress in the 2010 election, the 112th Congress has made significant efforts to end taxpayer funding of Planned Parenthood.

For the first time in history, the House of Representatives voted to prohibit all federal funding of Planned Parenthood—not once, but twice. On February 18, 2011, with a bipartisan vote of 240 to 185, the House passed an amendment offered by Representative Pence to the appropriations bill H.R. 1. The amendment ensured that no funds made available through the measure would support PPFA and its affiliates.¹⁴

Two months later, on April 14, 2011, the House again voted (gaining one more vote in support—241 to 185) to prohibit federal funds from being allocated to PPFA and its affiliates by passing H.Con.Res. 36, the first bill freshmen Representatives Diane Black (R-TN) and Martha Roby (R-AL) introduced in Congress.¹⁵

Representative Black stated, “I am proud that



my first bill as a Member of Congress is to defund Planned Parenthood and its affiliates.” She continued, “As a nurse for over 40 years, I spent my career protecting life. Now as a Member of Congress, I will continue to fight for the rights of the unborn through legislation like this; ensuring no federal funds are used for the promotion or performance of abortions.”¹⁶

Representative Roby expressed her commitment to ensuring that taxpayers’ dollars do not support abortion providers: “We have heard repeatedly from the American people that Planned Parenthood is not—absolutely not—where they want their tax dollars to go.... The more taxpayer dollars awarded to Planned Parenthood, the more abortions the group will perform.”¹⁷

Although the Senate failed to pass either measure de-funding Planned Parenthood, a victory was gained in the budget agreement forged by Speaker John Boehner (R-OH) compelling the Senate to finally discuss the issue and to have an up or down vote on H.Con.Res. 36. The Senate vote enables Americans to hold their Senators accountable for continuing taxpayer subsidies to the scandal-ridden abortion giant.

Congressional Response to the AUL Report

In response to the AUL Report, several Members of Congress attended a press conference held by Representatives Renee Ellmers (R-NC) and Randy Hultgren (R-IL). Representative Ellmers, a freshman congresswoman and former nurse, stated, “We have got to shine

light on this situation and get the facts out to the American people.”¹⁸

Representative Hultgren, another pro-life freshman leader, added: “This is absolutely the type of work the American people have sent us here to Washington to do—to ask these kinds of questions” about how their money is being spent.¹⁹ Representative Diane Black called the Report useful to “bring about transparency on this issue” and stated that Americans, regardless of where they stand on the issue, “do not want their tax dollars to be used for providing abortions.”²⁰



Representative Ellmers

Representative Chris Smith (R-NJ), a longtime pro-life leader in the House, stated that Planned Parenthood “should not be a sacrosanct organization or a politically correct organization that evades that kind of scrutiny,”²¹ and described the AUL Report as a “blueprint for action.”²²

In September 2011, the House Energy and Commerce Committee began an investigation of Planned Parenthood’s institutional practices and policies and its handling of federal funding. Leading the Congressional investigation, Representative Cliff Stearns (R-FL), Chair of the Energy and Commerce Committee’s Subcommittee on Oversight and Investigations, stated, “Since the Planned Parenthood Foundation of America receives about \$1 million a day in taxpayer funds, I sent a letter to the group’s president requesting documents and information as we look at the organization’s use of federal dollars and its compliance with various laws.”²³



The Committee's decision to investigate Planned Parenthood, a heavily subsidized, scandal-rocked abortion provider, shows that it takes seriously its responsibility to be a good steward of taxpayer dollars.

STATE EFFORTS TO DE-FUND PLANNED PARENTHOOD

Several states enacted legislation to deter the promotion and indirect subsidization of abortion through government funding. Though the method and extent of each state measure varied (as detailed below), in Indiana, Kansas, Montana, New Hampshire, New Jersey, North Carolina, Tennessee, Texas, and Wisconsin, Planned Parenthood was barred from subsidizing its abortion business with state or federal tax dollars. Predictably, Planned Parenthood has challenged several measures, and the Obama Administration has shown its commitment to the abortion business, weighing in to protect Planned Parenthood in Indiana and New Hampshire.

Indiana: Comprehensively Barring the Abortion Business from Taxpayer Funding

Indiana's law, House Enrolled Act (HEA) 1210—the most comprehensive ban on taxpayer funding to the abortion industry—prohibits Indiana agencies from contracting with or making grants to abortion clinics. When announcing that he would sign the bill, Governor Daniels noted that the bill was not a narrow margin or partisan piece of legislation, but one that passed with support from both parties in both chambers: “The principle involved commands the support of an overwhelming majority of Hoosiers, as reflected in greater than 2:1 bipartisan votes in both legislative chambers.”

Though media headlines often tout the law as de-funding Planned Parenthood, the Indiana law applies to abortion providers generally and is not exclusively targeting Planned Parenthood of Indiana (PPIN). Rather, PPIN is de-funded because Indiana de-funded the abortion industry, an industry in which PPIN chooses to remain.

Planned Parenthood and other abortion advocates decried the law as unnecessary, citing the Hyde amendment as an adequate means to protect taxpayer funding of abortion because it bars direct reimbursement for abortion with Medicaid funds (outside a few limited circumstances). However, Indiana's law is designed to stop providing any subsidies to the abortion industry. In the ongoing case brought by PPIN, the Commissioner of the Indiana State Department of Health underscored the importance of the Indiana law's restriction as it specifically applies to Planned Parenthood: “PPIN's audited financial statements for 2009 and 2010 give rise to a reasonable inference that it commingles Medicaid reimbursements with other revenues it receives.”²⁴

However, on June 24, 2011, District Court Judge Tanya Walton Pratt issued a preliminary injunction against a part of Indiana's law.

In her decision, Judge Pratt noted that HEA 1210 “will exact a devastating financial toll on PPIN.” However, the “tangible” effects on PPIN recited by the judge are the result of PPIN's own choices; HEA 1210 is not an absolute bar on PPIN's participation in Medicaid. The Indiana State Department of Health has explained that PPIN can still receive federal funding “if it establishes independent, unsubsidized affiliates to perform abortions.”²⁵



Instead, however, PPIN chose to initiate a lawsuit, lay off employees, stop taking new patients, and demand taxpayer dollars despite the democratic process' determination that true separation of its abortion business is necessary to ensure that taxpayers are not involuntarily subsidizing it.

Planned Parenthood's claim that the Indiana law "is violative of [Medicaid's] freedom of choice requirements" should fail upon appeal because Indiana's law, HEA 1210, respects the right of Medicaid patients to freely choose among qualified Medicaid providers. Federal law establishes that the State of Indiana has the authority to exclude from participating in Medicaid healthcare providers that the State determines are not *qualified*.²⁶

Furthermore, Indiana's determination that abortion providers are not qualified to participate in its Medicaid program does not change Medicaid's family planning benefits. In the 21 counties estimated by the Indiana Family and Social Services Administration (FSSA) to be impacted by HEA 1210's requirement, there still exist approximately 800 *qualified* provider locations where Medicaid patients may receive family planning services.

Unfortunately, the Obama Administration's statements threatening the loss of funds to the Medicaid patients of Indiana was another factor that Judge Pratt found "tilts in favor of granting an injunction." And, for now, Indi

ana's funding prohibition is on hold while the state appeals.

Kansas & Tennessee: Prioritizing Taxpayer Funding

In Kansas and Tennessee, certain funding for Planned Parenthood has been eliminated because states reprioritized which organizations can receive funds through specific government programs.

On this fundamental issue [of abortion], I will not yield and Planned Parenthood will not yield. -President (then Candidate) Obama

Planned Parenthood challenged the Kansas law, which prioritized Title X family planning funding to full service clinics, thus shifting over

\$300,000 from Planned Parenthood to other providers. A preliminary injunction against the law has been granted and appealed to the Tenth Circuit. In the meantime, the district court has ordered that Kansas resume funding Planned Parenthood on the same quarterly schedule that existed prior to enactment of the law.

In Tennessee, the Department of Health previously contracted with Planned Parenthood. Now, however, local public health departments provide family planning services themselves. This nearly statewide system has meant a loss of over \$300,000 to Planned Parenthood.

New Jersey: Governor Veto

For a second year in a row, budget-cutting Governor Chris Christie eliminated funding for the scandal-rocked Planned Parenthood in New Jersey.²⁷ Governor Christie's veto means



an estimated \$7.5 million loss for the abortion provider. Efforts to overturn Governor Christie's veto failed.

North Carolina, Montana, Texas, and Wisconsin: Legislative Budget Cuts

The North Carolina legislature passed a provision to its budget that stripped Planned Parenthood of over \$430,000 in taxpayer funding and overrode Governor Beverly Perdue's veto of the measure. Planned Parenthood has initiated a lawsuit challenging the law.

In March 2011, the Montana legislature voted to cut all family planning funding from its budget. Although federal funding for family planning was restored during budget negotiations with the Governor, the ultimate cuts to state family planning funding still affected Planned Parenthood.

Wisconsin cut from its budget nearly \$1 million in funding from Planned Parenthood—a sizable sum, though only a fraction of the \$18 million in funding Planned Parenthood receives in Wisconsin.

In Texas, several amendments were added to the budget to cut an estimated \$88.2 million from the abortion industry, with roughly \$47 million of that total being cut from Planned Parenthood. In addition to not wanting to subsidize the business of abortion, the abortion industry in Texas has given the Legislature ample reasons to cut it off from government funding. At least thirteen abortion providers are currently, or have been recently, under investigation. Planned Parenthood has not been immune to such scandal; its clinics in Texas have violated state law by performing abor-

tions without a license. With the significant loss of funds, Planned Parenthood has already announced it will be closing clinics.

New Hampshire: Executive Council Rejects Planned Parenthood Contract

Not wanting New Hampshire tax dollars subsidizing an abortion-providing organization, the New Hampshire Executive Council rejected a \$1.8 million dollar contract with Planned Parenthood. Subsequently, the Obama Administration contracted directly with Planned Parenthood of Northern New England, contravening the New Hampshire Executive Council's decision. The Executive Councilors are currently challenging the Administration's decision.

CONCLUSION

2011 saw tremendous legislative success, with nearly 20 percent of the states acting to end over \$60 million in government subsidies to the nation's largest abortion provider. Planned Parenthood's court challenges have stalled some of these legislative gains, and the Obama Administration's intervention in these cases has shown the President wedded to his 2007 promise to Planned Parenthood that, when it comes to abortion, "On this fundamental issue, I will not yield and Planned Parenthood will not yield."²⁸ However, states continue to work toward ending taxpayer funding for abortion providers, and through an official Congressional investigation, Planned Parenthood is being called to account for its use of federal funds.

More, and lasting, victories will come when Planned Parenthood no longer exerts control over the White House, when a majority in the Senate honors and respects human life, and



when the courts are ruled by law and not a pro-abortion ideology. These victories will mean much more than an end of forced taxpayer subsidization of the nation's largest abortion provider, whose radical agenda is inconsistent with American values. It will mean a renewed hope for the lives of the unborn. De-funding and a thorough investigation of Planned Parenthood will also mean true freedom for the countless women and girls victimized by Planned Parenthood's business.

Endnotes

¹ See Planned Parenthood Fed'n of Am., Planned Parenthood Celebrates National Women's Health Week (May 14, 2008), available at <http://www.plannedparenthood.org/about-us/newsroom/press-releases/planned-parenthood-celebrates-national-womens-health-week-20458.htm> (last visited Aug. 31, 2011).

² See A. Carey, *Planned Parenthood plans to expand abortion services nationwide*, THE DAILY CALLER (Dec. 23, 2010), available at <http://www.dailycaller.com/2010/12/23/planned-parenthood-plans-to-expand-abortion-services-nationwide/> (last visited Sept. 1, 2011). See also S. Foley, *Local PP chapter drops affiliation*, Corpus Christi Caller Times (Dec. 20, 2010), available at <http://www.caller.com/news/2010/dec/20/local-planned-parenthood-chapter-drops/> (last visited Sept. 1, 2011) (reporting that a Corpus Christi, Texas clinic planned to drop PPFA affiliation because of mandate); S.K. Livio, *Planned Parenthood may double the number of N.J. abortion clinics while expanding nationwide*, NJ.COM (Jan. 16, 2011), available at http://www.nj.com/news/index.ssf/2011/01/planned_parenthood_to_double_t.html (last visited Sept. 1, 2011).

³ See Planned Parenthood Fed'n of Am., Inc., PLANNED PARENTHOOD SERVICES 2 (Feb. 2011), available at http://www.plannedparenthood.org/files/PPFA/PP_Services.pdf (last visited Sept. 1, 2011).

⁴ See Planned Parenthood Fed'n of Am., Inc., PLANNED PARENTHOOD BY THE NUMBERS (2011), available at http://www.plannedparenthood.org/files/PPFA/PP_by_the_Numbers.pdf (last visited Sept. 1, 2011).

⁵ Planned Parenthood Fed'n of Am., Inc., ANNUAL REPORT 2008-2009 29 (2010), available at http://www.plannedparenthood.org/files/PPFA/PPFA_Annual_Report_08-09-FINAL-12-10-10.pdf (last visited Sept. 1, 2011). The abortion portion of "clinic income" figure was calculated as follows: 328,143 abortions (on average in both 2008 and 2009) multiplied by \$350 (minimum advertised cost) per abortion equals \$114.9 million.

⁶ Using the Guttmacher Institute's reported average amounts paid for surgical abortions at 10 weeks gestation in 2001, 2006, and 2009, and Planned Parenthood's reported numbers of abortions it performs, a conservative estimate (considering Planned

Parenthood performs later, more expensive abortions) is that abortion represented approximately 32 percent of Planned Parenthood's reported \$241 million in clinic income for the fiscal year ending in June 2001, approximately 33 percent of Planned Parenthood's reported \$345.1 million in clinic income for the fiscal year ending in June 2006, and approximately 37 percent of its reported \$404.9 million in clinic income for the fiscal year ending in June 2009. See S.K. Henshaw, *The accessibility of abortion services in the United States 2001*, 35(1) PERSP. ON SEXUAL & REPROD. HEALTH 19 (2003); R.K. Jones et al., *Abortion in the United States: incidence and access to services*, 2005, 40(1) PERSP. ON SEXUAL & REPROD. HEALTH 15 (2008); R.K. Jones & K. Kooistra, *Abortion incidence and services in the United States 2008*, 43(1) PERSP. ON SEXUAL & REPROD. HEALTH 47 (2011). See also Americans United for Life (AUL), *THE CASE FOR INVESTIGATING PLANNED PARENTHOOD 2-3* (2011), available at <http://www.aul.org/aul-special-report-the-case-for-investigating-planned-parenthood> (last visited Oct. 11, 2011).

⁷ Notably, PPFA failed to provide a number for its abortion referrals, though some Planned Parenthood affiliates do refer their patients to other (non-affiliated) abortion providers.

⁸ See Planned Parenthood Fed'n of Am., Inc., PLANNED PARENTHOOD SERVICES (Feb. 2011), available at http://www.plannedparenthood.org/files/PPFA/PP_Services.pdf (last visited Oct. 11, 2011); AUL, *supra*, at 55-77 (Appendix II. Planned Parenthood's Annual Reports of Services Provided).

⁹ The Hyde amendment was first enacted in 1976, and as included in the Omnibus Appropriations Act, 2009, H.R. 1105, 111th Cong, 2009, was signed into law Mar. 11, 2009. See Pub. L. No. 111-8 (2009); see also 42 U.S.C. § 300a-6 (Title X, § 1008, as added Dec. 24, 1970, Pub. L. No. 91-572, § 6(c), 84 Stat. 1508).

¹⁰ See, e.g., A. Johnson, *Opinion: Defund Planned Parenthood*, AOL NEWS (Mar. 8, 2011), available at <http://www.aolnews.com/2011/03/08/opinion-defund-planned-parenthood/> (last visited Sept. 1, 2011).

¹¹ Letter from Jan English, Chief, Med. Rev. Branch, Cal. Dep't of Health Servs., to Bob Coles, Vice President & Chief Fin. Officer, Planned Parenthood of San Diego & Riverside Counties (Nov. 19, 2004).

¹² First Amended Complaint at 22, *Gonzalez ex rel. United States v. Planned Parenthood of L.A.*, No. CV05-8818 AHM (C.D. Cal. May, 1, 2008).

¹³ See Alabama Dep't of Public Health, Statement of Deficiencies and Plan of Correction (Oct. 15, 2009), available at <http://www.liveaction.org/files/PPViolations.pdf> (last visited Apr. 13, 2011). Planned Parenthood of Alabama in Birmingham accepts Medicaid and Plan First payments. See *Planned Parenthood Health Info & Services, Birmingham Center-Birmingham, Alabama*, available at <http://www.plannedparenthood.org/health-center/centerDetails.asp?f=3253&a=90330&v=details> (last visited May 19, 2011).

¹⁴ See *Final Vote Results for Roll Call 93* (Feb. 18, 2011), available at <http://clerk.house.gov/evs/2011/roll093.xml> (last visited Aug. 31, 2011).

¹⁵ See *Final Vote Results for Roll Call 271* (Apr. 14, 2011), available at <http://clerk.house.gov/evs/2011/roll271.xml> (last visited



Aug. 31, 2011).

¹⁶ See *Black Introduces Bill to Defund Planned Parenthood in Continuing Resolution* (Apr. 12, 2011), available at <http://black.house.gov/press-release/black-introduces-bill-defund-planned-parenthood-continuing-resolution> (last visited Aug. 31, 2011).

¹⁷ See *Reps. Black and Roby Introduce Bill to Defund Planned Parenthood in CR* (Apr. 12, 2011), available at <http://rsc.jordan.house.gov/News/DocumentSingle.aspx?DocumentID=236163> (last visited Aug. 31, 2011).

¹⁸ See S. Wetzstein, *GOP has “blueprint for action” on Planned Parenthood* (July 14, 2011), available at <http://www.washingtontimes.com/news/2011/jul/14/gop-has-blueprint-for-action-on-planned-parenthood/> (last visited Aug. 31, 2011).

¹⁹ *Id.*

²⁰ See Americans United for Life, VIDEO: Rep. Diane Black speaks at news conference about AUL’s Planned Parenthood Report (July 18, 2011), available at <http://www.aul.org/2011/07/video-rep-diane-black-speaks-at-news-conference-about-auls-planned-parenthood-report/> (last visited August 31, 2011).

²¹ See Americans United for Life, VIDEO: Full comments by Rep. Chris Smith at news conference discussing AUL’s Planned Parenthood Report (July 18, 2011), available at <http://www.aul.org/2011/07/video-full-comments-by-rep-chris-smith-at-news-conference-discussing-auls-planned-parenthood-report/> (last visited Oct. 25, 2011).

²² *Id.*

²³ See *House Panel Launches Probe of Planned Parenthood* (Sep. 28, 2011), available at <http://politics.foxnews.mobi/quick-page.html?page=23882&content=57423765&pageNum=-1> (last visited Oct. 25, 2011).

²⁴ Def’s Mem. In Opp’n to the Mot. for Prelim. Inj. at 1, *Planned Parenthood of Ind. v. Comm’r of the Ind. State Dep’t of Health* (D. Ind. 11-00630); see Exhibit A-B at 21 (FY 2009 Audit); Exhibit A-C at 22 (FY 2010 Audit).

²⁵ Def’s Mem. In Opp’n to the Mot. for Prelim. Inj. at 23.

²⁶ See 42 U.S.C. § 1396a(p)(1).

²⁷ It was the Planned Parenthood of Perth Amboy, New Jersey that gained special notoriety after Live Action recorded the clinic manager’s encouraging advice to an alleged sex-trafficker on how to keep victimizing girls as young as 14.

²⁸ See *Obama pledged to Planned Parenthood: “I will not yield” to pro-life concerns* (Feb. 28, 2008), available at http://www.catholicnewsagency.com/news/obama_pledged_to_planned_parenthood_i_will_not_yield_to_prolife_concerns/ (last visited Oct. 25, 2011).

