

In the Supreme Court of the United States



FIRST CHOICE WOMEN'S RESOURCE CENTERS, INC.,
Petitioner,

v.

MATTHEW J. PLATKIN,
ATTORNEY GENERAL OF NEW JERSEY,
Respondent.

**On Writ of Certiorari to the
United States Court of Appeals for the Third Circuit**

**BRIEF OF AMICI CURIAE
DEMOCRATS FOR LIFE OF AMERICA,
RAINBOW PRO-LIFE ALLIANCE,
REHUMANIZE INTERNATIONAL,
ROCKVILLE WOMEN'S CENTER,
SECULAR PRO-LIFE
AND WOMEN'S CARE MARY'S CENTER
IN SUPPORT OF PETITIONER**

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STATEMENT OF INTEREST OF *AMICI CURIAE*¹

DEMOCRATS FOR LIFE OF AMERICA (“DFLA”) is the preeminent national organization representing pro-life Democrats. DFLA affirms the consistent ethic of life: opposing abortion, euthanasia, capital punishment, poverty, genocide and all injustices that threaten human dignity. DFLA’s mission is rooted both in the Democratic Party’s historic commitment to protecting the vulnerable, including women and children, in strengthening families and communities and striving to ensure equality of opportunity, reduction in poverty, and an effective social net that guarantees that all people have sufficient access to food, shelter, health care, and life’s other basic necessities.

RAINBOW PRO-LIFE ALLIANCE (“RPLA”) is a non-sectarian, nonpartisan, educational organization that promotes the pro-life ethic within the LGBTQ+ community while encouraging involvement within the pro-life community. RPLA members, a coalition of LGBTQ+ individuals and allies, often face hostility from both sides of the political spectrum, making associational privacy essential for their safety and ability to participate in public discourse.

REHUMANIZE INTERNATIONAL is a nonprofit, nonpartisan, nonsectarian human rights organization dedicated to creating a culture of peace and life, and

¹ No counsel for any party authored this brief in whole or in part. No person or entity other than *Amici* and their counsel made a monetary contribution intended to fund the preparation or submission of this brief. Timely notice was given to all parties.

in so doing, we seek to bring an end to all aggressive violence against humans, including abortion, capital punishment, police brutality, and unjust war, through education, discourse, and action. Our mission is to ensure that every human being's life is respected, valued, and protected. As a Consistent Life Ethic organization, we have many donors who support only one part of our mission; having their information exposed would cause a chilling effect on our work across all issues and limit our ability to fulfill our mission.

ROCKVILLE WOMEN'S CENTER and WOMEN'S CARE MARY'S CENTER ("RWC and WCMC"), nonprofit pregnancy resource centers in Maryland, directly serve women and families with resources such as counseling, medical services including pregnancy and STI testing and ultrasounds, and practical support. Like similar centers nationwide, these pregnancy centers have been subject to reputational attacks and fear the chilling effect of compelled disclosure of its donors and supporters.

SECULAR PRO-LIFE ("SPL") is a nonsectarian, non-partisan organization that advances the human rights of prenatal children through secular reasoning and inclusive coalition-building. Founded in 2009, SPL represents atheists, agnostics, and non-religious pro-lifers, as well as people of all faith backgrounds who want to work collaboratively to decrease abortion. SPL equips advocates with scientific, philosophical, and legal resources, and provides educational outreach in both pro-life and secular communities. Its members, often operating in politically and culturally hostile environments, regularly face exclusion, stereotyping, and harassment. Associational privacy is thus essential to protect their ability to participate in public discourse

and to ensure that secular voices for life are not silenced.

Together, *amici* represent a broad, diverse coalition across political, cultural, and social lines. Their common interest is protecting the First Amendment rights of association and speech. If governments can compel disclosure of donors to unpopular or dissenting causes, then minority voices, like pro-life Democrats; LGBTQ+, consistent life ethic, and secular pro-lifers; and pregnancy centers, particularly in abortion-permissive jurisdictions, will be silenced.



SUMMARY OF THE ARGUMENT

The First Amendment protects the right of citizens to associate freely and to support causes without fear of government-facilitated reprisal. From *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958), to *Americans for Prosperity Found. v. Bonta*, 141 S. Ct. 2373 (2021), this Court has consistently invalidated disclosure regimes that chill association, recognizing that compelled disclosure “may induce members to withdraw” and “dissuade others from joining.” *NAACP*, 357 U.S. at 463.

New Jersey’s sweeping investigatory subpoena demanding years of donor information from First Choice Women’s Resource Centers cannot survive that standard. The subpoena is not narrowly tailored to any legitimate interest. Instead, it reflects hostility toward the pro-life viewpoint and threatens to expose thousands of citizens to economic reprisals, professional

harm, and social ostracism. *Bonta*, 141 S. Ct. at 2384-89.

Federal courts are the proper forum to prevent such irreparable First Amendment injury. Plaintiffs need not suffer prosecution or disclosure before obtaining judicial relief. *See SBA List v. Driehaus*, 573 U.S. 149, 158 (2014); *Steffel v. Thompson*, 415 U.S. 452, 459 (1974). Once donor identities are revealed, the harm is permanent and the chilling effect complete.

That chilling effect is not theoretical. Since *Dobbs v. Jackson Women’s Health Organization*, 142 S. Ct. 2228 (2022), pregnancy centers have faced a wave of attacks: firebombings, smashed windows, graffiti and threats such as “If abortion isn’t safe, you aren’t either.” Courts have always given decisive weight to such evidence. *See Brown v. Socialist Workers ‘74 Campaign Comm.*, 459 U.S. 87, 98-99 (1982).

New Jersey Attorney General Platkin’s actions also exemplify viewpoint discrimination. He has shielded abortion providers with confidentiality while targeting pro-life centers for investigatory scrutiny. Such singling out of disfavored speakers is “an egregious form of content discrimination” that the First Amendment does not permit. *Rosenberger v. Rector & Visitors of Univ. of Va.*, 515 U.S. 819, 829 (1995).

Finally, *amici* themselves embody the minority voices most in need of protection: Democrats for Life of America, Rainbow Pro-Life Alliance, Rehumanize International, Secular Pro-Life, Rockville Women’s Center, and Women’s Care Mary’s Center. Pro-life Democrats such as Lisa Stiller, A.J. Oliver, and Senator Michael McDonnell have been stripped of leadership and even forced out of their party for their

views. LGBTQ+ pro-lifers often encounter ostracism from both sides. Local pregnancy centers face boycotts and harassment merely for providing services. Disclosure would silence these communities altogether, contrary to this Court’s recognition that “freedom to differ is not limited to things that do not matter much.” *West Virginia Bd. of Educ. v. Barnette*, 319 U.S. 624, 642 (1943).

For these reasons, the Court should reaffirm that compelled donor disclosure in this context violates the First Amendment and that federal courts have jurisdiction to provide immediate relief.



ARGUMENT

I. Donor Disclosure Unconstitutionally Chills Associational Freedoms

In *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958), this Court held that compelled disclosure of the NAACP’s membership lists violated the First Amendment because it exposed individuals to “economic reprisal, loss of employment, threat of physical coercion, and other manifestations of public hostility.” *Id.* at 462. The Court emphasized that compelled disclosure “may induce members to withdraw from the Association and dissuade others from joining it” and thus constituted a “substantial restraint upon the exercise by petitioner’s members of their right to freedom of association.” *Id.* at 463. *See also Bates v. City of Little Rock*, 361 U.S. 516, 524 (1960) (invalidating compelled disclosure of NAACP membership lists where record showed “harassment and threats

of bodily harm”); *Shelton v. Tucker*, 364 U.S. 479, 485-86 (1960) (striking down disclosure of teachers’ associational affiliations as an “unwarranted inhibition” of First Amendment rights); *Brown v. Socialist Workers ‘74 Campaign Comm. (Ohio)*, 459 U.S. 87, 98-99 (1982) (granting exemption from campaign finance disclosure laws where minor party demonstrated “private hostility and harassment” directed at its members).

This Court has repeatedly reaffirmed that compelled disclosure burdens the associational rights of those who support controversial causes. In *Buckley v. Valeo*, 424 U.S. 1 (1976), the Court recognized that disclosure of political contributions “seriously infringes on privacy of association and belief guaranteed by the First Amendment.” *Id.* at 64. The Court held that exemptions are required where there is a “reasonable probability” that disclosure “will subject those identified to threats, harassment, or reprisals from either Government officials or private parties.” *Id.* at 74. Accord *McConnell v. FEC*, 540 U.S. 93, 198 (2003) (acknowledging “threats, harassment, and reprisals” against contributors can justify exemption from disclosure).

The protection extends to anonymous expression as well. In *Talley v. California*, 362 U.S. 60 (1960), the Court struck down an ordinance banning anonymous pamphlets, reasoning that anonymity is “exemplary of the purpose” of the First Amendment. *Id.* at 64-65. That principle was reaffirmed in *McIntyre v. Ohio Elections Comm’n*, 514 U.S. 334 (1995), which held unconstitutional a statute requiring disclosure of authorship on political leaflets. *Id.* at 341-42 (anonymity is often necessary to avoid “economic or official retaliation” and “social ostracism”).

Most recently, in *Americans for Prosperity Foundation v. Bonta*, 141 S. Ct. 2373 (2021), this Court invalidated California’s blanket requirement that charities disclose their donors to the State Attorney General. The Court explained that compelled disclosure “creates an unnecessary risk of chilling in violation of the First Amendment, just as it did in *NAACP* and its progeny.” *Id.* at 2384. The Court emphasized that the “deterrent effect feared by donors is real and pervasive,” *id.* at 2388, and that disclosure requirements must be “narrowly tailored to an asserted interest” under exacting scrutiny. *Id.* at 2385.

Taken together, these precedents establish a categorical rule: compelled disclosure of an organization’s donors or members violates the First Amendment where, as here, there is a well-documented risk of hostility and reprisals. That protection is not limited to the civil rights era but applies equally to pregnancy centers; pro-life Democrats; LGBTQ+, consistent life ethic, and secular pro-lifers; and others whose speech today is disfavored.

II. Federal Courts Are the Proper Forum to Prevent Irreparable First Amendment Injury

This Court has long recognized that federal courts exist to prevent irreparable constitutional injury, particularly in the First Amendment context. “[T]he loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (plurality). Forcing organizations to endure compelled disclosure before seeking redress would destroy their associational rights before any court could provide relief.

Congress enacted 42 U.S.C. § 1983 to provide a federal forum for precisely this situation, when state officials threaten constitutional rights under color of law. In *Mitchum v. Foster*, 407 U.S. 225 (1972), the Court explained that § 1983 is “a uniquely federal remedy” designed to provide relief from “incursions under the claimed authority of state law upon rights secured by the Constitution.” *Id.* at 239. Requiring exhaustion of state remedies would invert that design. See *Patsy v. Bd. of Regents of Fla.*, 457 U.S. 496, 516 (1982) (holding exhaustion of state administrative remedies not required under § 1983). The federal forum exists to protect constitutional rights against precisely the sort of overreach exemplified here.

This Court has repeatedly allowed pre-enforcement challenges where plaintiffs face a credible threat of enforcement that chills speech. In *Susan B. Anthony List v. Driehaus*, 573 U.S. 149 (2014), the Court unanimously held that pro-life advocacy groups could bring a pre-enforcement challenge to an Ohio election law, emphasizing that plaintiffs “need not risk prosecution to challenge a statute that they claim deters the exercise of their constitutional rights.” *Id.* at 158. Accord *Steffel v. Thompson*, 415 U.S. 452, 459 (1974) (“[I]t is not necessary that petitioner first expose himself to actual arrest or prosecution to be entitled to challenge a statute that he claims deters the exercise of his constitutional rights.”); *Doran v. Salem Inn, Inc.*, 422 U.S. 922, 931 (1975) (allowing pre-enforcement challenge because plaintiffs “should not be required to await and undergo a criminal prosecution as the sole means of seeking relief”).

These principles apply with full force here. The Attorney General’s investigatory subpoena demanding

the identities of thousands of donors to a pregnancy center carries a credible and imminent threat of enforcement. That threat is sufficient to chill associational activity. *Virginia v. Am. Booksellers Ass’n, Inc.*, 484 U.S. 383, 392-93 (1988) (plaintiffs not deprived of standing “simply because they have not yet been prosecuted”). Article III requires only a “case or controversy,” not that plaintiffs first suffer irreparable harm before suing. *See MedImmune, Inc. v. Genentech, Inc.*, 549 U.S. 118, 128-29 (2007) (rejecting the notion that a party must “bet the farm” before seeking judicial relief).

Nor can prudential ripeness doctrines justify withholding jurisdiction. The chilling effect of compelled disclosure is not speculative but immediate. In *NAACP v. Alabama*, the Court found disclosure unconstitutional not because reprisals had already occurred, but because “the threat of harassment and reprisals” itself burdened the right to associate. 357 U.S. at 462-63. Similarly, in *Americans for Prosperity Found. v. Bonta*, 141 S. Ct. 2373 (2021), the Court invalidated California’s donor-disclosure requirement on its face, recognizing that compelled disclosure “creates an unnecessary risk of chilling in violation of the First Amendment.” *Id.* at 2384.

The Third Circuit’s conclusion that this case was “not ripe” because the subpoena had not yet been enforced directly contradicts these precedents. Once donor information is disclosed, the harm is permanent. Federal jurisdiction exists to prevent precisely this type of irreparable injury. To deny jurisdiction until after disclosure would be to render the First Amendment protection meaningless.

III. Pregnancy Centers and Their Supporters Face Documented Harassment and Violence

The threat of harassment facing pregnancy centers and their donors is not hypothetical but well-documented. This Court has consistently treated such evidence as decisive in invalidating disclosure regimes. In *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958), the Court recognized that compelled disclosure of members' names created an unconstitutional "chilling effect" because it exposed them to "economic reprisal, loss of employment, threat of physical coercion, and other manifestations of public hostility." *Id.* at 462. Likewise, in *Brown v. Socialist Workers '74 Campaign Comm. (Ohio)*, 459 U.S. 87 (1982), the Court granted an exemption from disclosure laws to a minor political party because evidence showed "members had been harassed, and even physically threatened, for their political views." *Id.* at 99. *See also Bates v. City of Little Rock*, 361 U.S. 516, 524 (1960) (finding disclosure unconstitutional where "public exposure" of members threatened "harassment and threats of bodily harm").

The evidence here is far stronger. Since this Court's decision in *Dobbs v. Jackson Women's Health Organization*, 142 S. Ct. 2228 (2022), pregnancy centers nationwide have suffered sustained vandalism, threats, and even firebombings. More than ninety separate attacks have been publicly reported in at least two dozen states. Representative examples include: the firebombing of Wisconsin Family Action in Madison, Wisconsin (May 2022), where Molotov cocktails ignited offices and graffiti threatened, "If abortions aren't safe, then you aren't either"; the arson attack on CompassCare Pregnancy Services in Buffalo, New

York (June 2022), which destroyed medical equipment and was accompanied by spray-painted threats; the vandalism of CareNet Frederick in Maryland (May 2022), defaced with “Not a real clinic” and “End forced motherhood”; and the attack on the Lennon Pregnancy Center in Dearborn Heights, Michigan (June 2022), where eleven windows were smashed and doors spray-painted with threats.²

These incidents are not isolated. They are part of a coordinated campaign against pregnancy centers because of their pro-life viewpoint. Federal authorities have acknowledged that extremist groups such as “Jane’s Revenge” have claimed responsibility for attacks on centers across the country.³ The predictable effect is that donors, staff, and volunteers reasonably fear similar reprisals if their support becomes public. This is precisely the kind of “reasonable probability” of harassment that justifies anonymity. *Buckley v. Valeo*, 424 U.S. 1, 74 (1976) (exemption required where disclosure “will subject those identified to threats, harassment, or reprisals from either Government officials or private parties”).

Nor is this risk confined to organizational staff. Donors themselves have legitimate reason to fear social and economic retaliation. In *Americans for Prosperity Found. v. Bonta*, 141 S. Ct. 2373 (2021), this Court struck down California’s blanket donor-disclosure rule, emphasizing that “[t]he deterrent effect feared by donors is real and pervasive.” *Id.* at 2388. The Court

² See, e.g., Appendix (Documented Attacks on Pregnancy Centers, 2022-24).

³ See FBI Press Release, “FBI Seeking Information on Jane’s Revenge-Linked Attacks” (June 2022).

cited evidence that nonprofit supporters feared “threats and harassment” if their names were disclosed. *Id.* at 2389. If that risk justified facial invalidation in *Bonta*, the risk here, where dozens of actual violent incidents are already documented, is even more compelling.

Disclosure requirements cannot be defended by promises of confidentiality. In *Bonta*, the Court rejected California’s assurances that donor lists would not be made public, noting “the State’s promise of confidentiality . . . does not cure the constitutional infirmity.” 141 S. Ct. at 2389. Once donor names are handed to the government, “past breaches and the significant risk of future breaches” suffice to chill association. *Id.* The same is true here. Even the possibility that hostile state officials might leak or mishandle donor information is enough to deter contributions.

As *Doe v. Reed*, 561 U.S. 186 (2010), made clear, courts must give weight to “evidence of harassment, threats, or reprisals” when evaluating disclosure regimes. *Id.* at 200. That evidence is overwhelming in this case. From firebombings to threats of physical harm, pregnancy centers and their supporters face real danger. Compelling them to expose thousands of donors in this environment would violate the First Amendment’s core promise that unpopular voices may associate freely without fear of government-facilitated reprisal.

IV. The Attorney General’s Actions Reflect Impermissible Viewpoint Discrimination

The First Amendment forbids government from suppressing speech or association based on hostility to a disfavored viewpoint. This Court has consistently held that “the government must abstain from regulating

speech when the specific motivating ideology or the opinion or perspective of the speaker is the rationale for the restriction.” *Rosenberger v. Rector & Visitors of Univ. of Va.*, 515 U.S. 819, 829 (1995). Viewpoint discrimination is “an egregious form of content discrimination” and “is presumed impermissible.” *Id.*; see also *Reed v. Town of Gilbert*, 576 U.S. 155, 163 (2015) (laws targeting speech based on subject matter or function are content-based and presumptively invalid).

The New Jersey Attorney General’s investigatory actions cannot be understood apart from his open hostility to pregnancy centers’ pro-life viewpoint. In December 2022, he issued a formal “Consumer Alert” warning against so-called “crisis pregnancy centers,” asserting they “mislead” women and “obstruct” reproductive healthcare.⁴ In contrast, abortion providers in New Jersey enjoy affirmative legal protections, including guidance from the Attorney General to practice “data minimization” and preserve confidentiality. The juxtaposition is stark: the same official who shields abortion clinics seeks to expose pro-life centers and their donors to political and social reprisals. That is classic viewpoint discrimination. *Cf. Healy v. James*, 408 U.S. 169, 187 (1972) (university president could not deny recognition to student group merely because he disagreed with its philosophy).

This Court has repeatedly rejected similar efforts to penalize groups for their perspective. In *Good News Club v. Milford Cent. Sch.*, 533 U.S. 98 (2001), the

⁴ Matthew J. Platkin, “Consumer Alert: Crisis Pregnancy Centers” (Dec. 7, 2022), https://www.nj.gov/oag/newsreleases22/2022-1207_crisis-pregnancy-centers.pdf.

Court struck down exclusion of a religious club from a limited public forum because the school's action "constitutes viewpoint discrimination" against religious perspectives. *Id.* at 107. In *Rosenberger*, the exclusion of a Christian newspaper from university funding was impermissible because "the government offends the First Amendment when it imposes financial burdens on certain speakers based on the content of their expression." 515 U.S. at 828-29. The principle is clear: where the State disfavors speech because of its ideological stance, its actions cannot withstand constitutional scrutiny.

The Attorney General's targeting of pregnancy centers also parallels the unconstitutional retaliation in *Elrod v. Burns*, 427 U.S. 347 (1976), where the Court held that firing employees for their political affiliation violated associational rights. *Id.* at 356-57. Conditioning benefits or imposing burdens on the basis of political or ideological loyalty "unquestionably inhibits protected belief and association." *Id.* at 359. *See also Rutan v. Republican Party of Ill.*, 497 U.S. 62, 75 (1990) (patronage practices burden First Amendment rights by coercing employees to "conform their beliefs"). Here, the burden is disclosure: pregnancy centers are singled out for investigatory demands precisely because they do not conform to the Attorney General's ideological commitment to abortion.

This pattern is reinforced by evidence that pro-life Democrats have faced party reprisals for their views. Former Morristown, New Jersey, Democratic chair A.J. Oliver was removed from leadership after his pro-life convictions became public, despite years

of party service.⁵ Likewise, Nebraska State Senator Michael McDonnell was censured by his state party in 2024 and ultimately forced to switch parties after supporting pro-life legislation.⁶ These examples underscore how disclosure of donors to pro-life groups would expose them to ostracism, loss of opportunities, and reputational harm within their own political communities. The First Amendment forbids the State from facilitating such reprisals. *Brown v. Socialist Workers '74 Campaign Comm.*, 459 U.S. 87, 98-99 (1982) (minor party entitled to exemption where disclosure exposed members to harassment and retaliation).

Nor can these investigatory actions be justified as neutral “consumer protection.” In *Rosenberger*, this Court rejected the University’s claim of fiscal neutrality, recognizing that the exclusion was in fact based on hostility to a viewpoint. 515 U.S. at 832-33. Similarly, the Attorney General’s selective targeting of pro-life organizations while privileging abortion providers reveals a pretextual rationale for a fundamentally discriminatory policy.

In *NAACP v. Alabama*, the Court warned that compelled disclosure of membership lists was especially unconstitutional where the demand came from a hostile state administration intent on suppressing a disfavored movement. 357 U.S. at 463. That is precisely the case here: compelled disclosure of pregnancy center donors

⁵ H. Hiester, “83% of Democrats Support Abortion as Party Fully Supports Abortions Up to Birth,” *Catholic Voice* (June 12, 2025).

⁶ J. Anderson, “Nebraska State Sen. Mike McDonnell announces that he’s switching from Democrat to Republican,” *KETV Omaha* (Apr. 3, 2024).

is being used not to serve a neutral law-enforcement function but to discredit and suppress those who dissent from the State's pro-abortion orthodoxy. Such viewpoint-based retaliation cannot stand under the First Amendment.

V. Disclosure Especially Threatens Minority Voices: Pro-Life Democrats; LGBTQ+, Consistent Life Ethic, and Secular Pro-Lifers; and Local Pregnancy Centers, Particularly in Abortion-Permissive States

"History abundantly documents the tendency of Government, however benevolent and benign its motives, to view with suspicion those who most fervently dispute its policies." *Healy v. James*, 408 U.S. 169, 180 (1972). The First Amendment's protection of associational privacy exists precisely to safeguard dissident minorities from official or social reprisals; it is most essential for those whose views place them outside the mainstream of political or social consensus. Indeed, this Court has long recognized that compelled disclosure of affiliation with unpopular causes can suppress minority viewpoints. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462-63 (1958) (disclosure may "induce members to withdraw" and "dissuade others from joining"); *Brown v. Socialist Workers '74 Campaign Comm. (Ohio)*, 459 U.S. 87, 98-99 (1982) (exempting minor party from disclosure where evidence showed harassment and threats). The lived experiences of *amici* and their supporters confirm that compelled disclosure today would chill participation just as surely as it did in those cases.

For pro-life Democrats,⁷ Lisa Stiller's story is illustrative. A lifelong Democrat, she chaired both her state party's 1st and 6th Congressional District committees, led the state Health Care Caucus for six years, and served as Secretary of the State Education Caucus while also serving on the boards of Consistent Life Network and Democrats for Life of America. When activists discovered her pro-life affiliations, they launched public attacks, demanded her resignation, and succeeded in excluding her from leadership in an organization she had served for decades, solely because of her dissent on abortion.⁸ Her experience demonstrates how disclosure of affiliations with pro-life organizations can translate into reputational harm and loss of political standing, even for respected party leaders. *Cf. NAACP*, 357 U.S. at 462-63.

A.J. Oliver's experience underscores the same risk. Appointed in 2020 to revive the then-inactive Morristown Democratic Committee, he rebuilt the organization, raised funds, organized voter-registration drives and community service projects, and coordinated support for Democratic candidates, including statewide

⁷ Contrary to public perception, not all members of the Democratic support abortion. The false perception that they do has led to increased viewpoint discrimination against public officials who are registered as Democrats. As shown by a recent Gallop Poll in June of 2025, 81% of Democrats reported that they thought abortion should be legal in all or most cases, while 83% considered themselves pro-abortion, leaving a significant minority number of members of the Democratic Party pro-life in some respects, and the true number is believed to be actually higher. As discussed herein, this has also led to increased viewpoint discrimination against public officials who are registered as Democrats.

⁸ Statement of Lisa Stiller (Aug. 2025) (on file with counsel).

racism. The committee unanimously elected him to a two-year term. When Oliver later sought a County Commissioner seat, local party officials discovered his pro-life views and urged Democrats to back Republicans instead; the Republicans swept the race. Afterward, Oliver was removed illegally from his duly elected chairmanship on the ground that he did not “live by Democratic values,” his reputation tarnished despite years of party service.⁹ Donors reasonably fear similar ostracism if their support for pregnancy centers is exposed. *See Brown*, 459 U.S. at 98-99 (recognizing exemptions where disclosure invites reprisals).

Nebraska State Senator Michael McDonnell, Catholic and a lifelong Democrat, faced formal censure from his party after voting for restrictions on abortion and for protections related to minors’ medical interventions. The censure cut him off from party resources and caucus strategy; he ultimately changed parties in 2024, making clear that censure would not change his votes.¹⁰ If an elected official with a public platform can be punished for pro-life views, ordinary donors can reasonably foresee professional and social consequences upon disclosure. *See Buckley v. Valeo*, 424 U.S. 1, 71-74 (1976) (recognizing “reasonable probability” of threats or harassment justifies anonymity).

Similarly, Rainbow Pro-Life Alliance, Rehumanize International, and Secular Pro-Life members often encounter a double bind: ostracism within their respec-

⁹ Statement of A.J. Oliver (Aug. 2025) (on file with counsel).

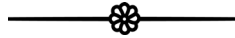
¹⁰ J. Anderson, “Nebraska State Sen. Mike McDonnell announces that he’s switching from Democrat to Republican,” KETV Omaha (Apr. 3, 2024).

tive spaces for dissenting on abortion and, at times, suspicion within pro-life spaces because of their orientation, gender identity, advocacy, or beliefs. Many report broken friendships, online harassment, and professional setbacks merely for identifying as pro-life. For such members, anonymity is a condition of participation: without it, many cannot safely speak or donate at all. *See McIntyre v. Ohio Elections Comm’n*, 514 U.S. 334, 341-42 (1995) (anonymity protects against “economic or official retaliation” and “social ostracism”); *Doe v. Reed*, 561 U.S. 186, 200 (2010) (courts must credit evidence of “threats, harassment, or reprisals” when assessing disclosure).

Rockville Women’s Center and Women’s Care Mary’s Center operate in Maryland, a state where more than 39,000 abortions are performed each year under some of the nation’s most permissive laws. RWC and WCMC provide life-affirming services such as ultrasounds, pregnancy and STI testing, counseling, and material aid like diapers and formula. Yet local activists have labeled them and other pregnancy centers “fake clinics,” and community partners have been pressured to sever ties. Compelled disclosure of thousands of supporters would predictably chill future donations and volunteer affiliation, undermining the Centers’ and other similarly situated pregnancy resource centers’ ability to serve women and families. *See Roberts v. United States Jaycees*, 468 U.S. 609, 622 (1984) (freedom of association preserves “political and cultural diversity” and “shield[s] dissident expression from suppression by the majority”).

These narratives demonstrate that disclosure does not operate in a vacuum; it functions within a social context where dissenters are punished. The

reprisals are not speculative but actual, and disclosure magnifies the chilling effect on those who dissent from prevailing orthodoxy. The First Amendment does not require citizens to risk their livelihoods, reputations, or safety to participate in the debate over abortion; in fact, its promise of associational freedom exists precisely to protect such voices. *See West Virginia Bd. of Educ. v. Barnette*, 319 U.S. 624, 642 (1943) (“Freedom to differ is not limited to things that do not matter much.”). Protecting anonymity, particularly for disenfranchised or marginalized supporters, is essential to ensuring that minority voices remain audible and safe in public discourse.



CONCLUSION

The Constitution does not permit state officials to weaponize investigatory power against disfavored organizations or to expose citizens to reprisal for their beliefs. New Jersey’s subpoena demanding the identities of thousands of pregnancy-center donors strikes at the heart of the First Amendment’s protections for free speech and free association.

The record of harassment and violence against pregnancy centers, combined with the documented reprisals against other pro-life supporters, makes the chilling effect undeniable. Federal jurisdiction exists to prevent that irreparable harm before it occurs.

For the foregoing reasons, and those set forth by Petitioner, the judgment of the Third Circuit should be reversed.

Respectfully submitted,

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August 28, 2025



RULE 37.6 STATEMENT

Pursuant to Supreme Court Rule 37.6, counsel certifies that no counsel for a party authored this brief in whole or in part, and that no person other than *amici curiae*, their members, or their counsel made a monetary contribution intended to fund the preparation or submission of this brief. Letters of consent to the filing of this brief have been filed with the Clerk of the Court.

APPENDIX TABLE OF CONTENTS

List of Pregnancy Center Attacks 1a

LIST OF PREGNANCY CENTER ATTACKS

The following are publicly reported incidents of vandalism, arson, and threats against pregnancy resource centers and allied organizations following this Court's decision in *Dobbs v. Jackson Women's Health Organization*, 142 S. Ct. 2228 (2022). This list is representative and not exhaustive.

List of attacks and intimidation:

1. Trotter House¹, Austin, Texas, May 5, 2022
2. Wisconsin Family Action², Madison, Wisconsin, May 5, 2022
3. CareNet Clinic³, Frederick, Maryland, May 4, 2022
4. Southeast Portland Pregnancy Resource Center⁴, Portland, Oregon, May 4, 2022
5. First Step Pregnancy Resource Center⁵, Bangor, Maine, May 6, 2022

¹ <https://pregnancyhelpnews.com/pregnancy-help-director-says-onward-after-pro-abortion-attack-over-dobbs-leak>

² <https://www.nytimes.com/2022/05/08/us/madison-anti-abortion-center-vandalized.html>

³ <https://www.liveaction.org/news/abortion-violence-targets-maryland-pro-life-pregnancy-center/>

⁴ <https://www.wsj.com/opinion/the-attacks-on-crisis-pregnancy-centers-janes-revenge-abortion-roe-v-wadeviolence-destroyed-11655653644>

⁵ <https://www.christianitytoday.com/2022/05/supreme-court-leak-alito-pregnancy-centers-abortion/>

6. Alpha Pregnancy Center, Reisterstown, May 7, 2022
7. First Care Women's Health⁶, Manassas, Virginia, May 7, 2022
8. Concerned Women for America⁷, Alexandria, Virginia, May 7, 2022
9. Loreto House⁸, Denton, Texas, May 7, 2022
10. Woman to Woman Pregnancy Resource Center⁹, May 8, 2022
11. BirthRight of Frederick¹⁰, Denton, Texas, May 8, 2022
12. Oregon Right to Life, Keizer, Oregon, May 8, 2022
13. Wisconsin Family Action, Madison, Wisconsin, May 8, 2022

<https://www.wbaltv.com/article/alpha-pregnancy-center-vandalism/40012160>

⁶ <https://www.potomaclocal.com/2022/05/13/tense-days-after-womens-clinic-vandalized-we-dont-know-whats-going-to-happen-next/>

⁷ <https://tennesseestar.com/the-tennessee-star/press-secretary-katie-everett-of-concerned-women-for-america-explains-how-its-alexandria-virginia-offices-were-vandalized/jcarr/2022/05/14/>

⁸ <https://www.cbsnews.com/dfw/news/denton-womens-clinic-vandalized-with-pro-abortion-rights-graffiti/>

⁹ <https://www.cbsnews.com/dfw/news/denton-womens-clinic-vandalized-with-pro-abortion-rights-graffiti/>

¹⁰ <https://twitter.com/StreamerWayward/status/1525861784434900992>

App.3a

14. Family Life Services¹¹, Ypsilanti, Michigan, May 12, 2022
15. Family Life Services¹², Ypsilanti, Michigan, May 14, 2022
16. His Nesting Place Home for Mothers & Children¹³, May 16, 2022
17. Next Step Pregnancy Services¹⁴, Lynnwood, Washington, May 25, 2022
18. Women's Hope Medical Clinic¹⁵, Auburn, Alabama, May 25, 2022
19. Dove Medical Clinic¹⁶, Eugene, Oregon, May 27, 2022
20. South Broward Pregnancy Center¹⁷,

¹¹ <https://www.oregonlive.com/crime/2022/05/molotov-cocktails-thrown-at-oregon-right-to-life-building-keizer-police-investigating.html>

¹² <https://pregnancyhelpnews.com/has-your-state-experienced-recent-pro-abortion-violence-find-out-here>

¹³ <https://www.facebook.com/HisNestingPlace/videos/478468130632657/>

¹⁴ <https://www.catholicnewsagency.com/news/251392/vandalism-of-pro-life-pregnancy-centers-continues-across-us-with-incident-near-seattle>

¹⁵ https://oanow.com/news/local/the-thing-you-cant-compromise-on-as-a-catholic-vicar-parishioners-respond-to-vandalism-at/article_358b33a8-d86a-11ec-92fa-6bbb3b68c30a.html

¹⁶ <https://twitter.com/rubyfire77/status/1530295645998698499>

¹⁷ <https://www.catholicnewsagency.com/news/251495/florida-pro-life-pregnancy-center-hit-with-janes-revenge-abortion-vandalism>

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Hollywood, Florida, May 28, 2022

21. Community Pregnancy Center¹⁸, Anchorage, Alaska
22. Agape Pregnancy Center¹⁹, Des Moines, Iowa, June 2, 2022
23. Capitol Hill Pregnancy Center²⁰, Washington, D.C., June 3, 2022
24. CareNet Pregnancy & Family Services of Puget Sound²¹, June 4, 2022
25. Mountain Area Pregnancy Services²², Asheville, North Carolina, June 6, 2022
26. CompassCare Pregnancy Services²³, Buffalo, New York, June 7, 2022
27. Options360 Women's Clinic²⁴, Vancouver, Washington, June 9, 2022

¹⁸ <https://alaskawatchman.com/2022/06/09/anchorage-pro-life-center-vandalized-with-graffiti-broken-glass-and-nails/>

¹⁹ <https://twitter.com/YPTActual/status/1535323104523722765>

²⁰ <https://www.dailysignal.com/2022/06/03/d-c-pregnancy-center-vandalized-jane-says-revenge/>

²¹ <https://www.liveaction.org/news/pro-abortion-violence-escalates-overturn-roe/>

²² <https://video.foxnews.com/v/6307433820112>

²³ <https://www.compasscarecommunity.com/2022/06/compasscares-buffalo-office-firebombed-by-abortion-activists/>

²⁴ <https://www.anarchistfederation.net/vancouver-wa-janes-revenge-attack-on-crisis-pregnancy-center/>

App.5a

28. First Image²⁵, Gresham, Oregon, June 10, 2022
29. HOPE Pregnancy Center²⁶, Philadelphia, Pennsylvania, June 15, 2022
30. Minnesota Concerned Citizens for Life³¹, Minneapolis, Minnesota, June 15, 2022
31. The Lennon Center²⁷, Dearborn Heights, Michigan, June 19, 2022
32. Pregnancy Counseling Center²⁸, Redford Township, June 19, 2022
33. Jackson Right to Life²⁹, Jackson, Michigan, June 21, 2022
34. Pregnancy Resource Center of Salt Lake City³⁰, Salt Lake City, Utah, June 24, 2022

²⁵ <https://www.wsj.com/opinion/the-attacks-on-crisis-pregnancy-centers-janes-revenge-abortion-roe-v-wadeviolence-destroyed-11655653644>

²⁶ <https://www.catholicnewsagency.com/news/251546/philadelphia-pro-life-clinic-vandalized>

²⁷ <https://www.youtube.com/watch?v=zQPKd2ZzIYM>

²⁸ <https://www.washingtontimes.com/news/2022/jun/22/vandals-attack-two-michigan-pro-life-pregnancy-cen/>

²⁹ <https://www.foxnews.com/politics/pro-life-org-congressmans-campaign-office-vandalized-janes-revenge>

³⁰ <https://www.ncregister.com/cna/attacks-on-churches-pro-life-pregnancy-centers-continue;>

<https://www.lifenews.com/2022/06/16/pro-abortion-radicals-attack-pro-life-groups-office-smash-windows-vandalize-walls/>
<https://mobile.twitter.com/AFrazierLife/status/1542909896231981057>

35. Northeast Ohio Right to Life, Akron, Ohio, June 24, 2022
36. Pregnancy Help Inc.³¹, New York, New York, June 24, 2022
37. Dove Medical Center³², Eugene, Oregon, June 24, 2022
38. Lincolnton Crisis Pregnancy Center³³, Lincolnton, North Carolina, June 25, 2022
39. Life Choices, Longmont, Colorado, June 25, 2022
40. Blue Ridge Pregnancy Center³⁴, Lynchburg, Virginia, June 25, 2022
41. Tree of Life Pregnancy Support Center³⁵, June 25, 2022
42. Avenues Pregnancy Center³⁶, Glendale, California, June 25, 2022

³¹ <https://religionunplugged.com/news/2022/9/11/new-york-pregnancy-center-aims-to-provide-women-with-a-real-choice>

³² <https://www.wtrf.com/news/10-arrested-in-oregon-night-of-rage-protest-over-scotus-roe-v-wade-decision/>

³³ <https://www.charlotteobserver.com/news/state/north-carolina/article271377012.html>;

<https://kdvr.com/news/local/longmont-pregnancy-center-vandalized-overnight/>

³⁴ <https://wtop.com/virginia/2022/06/no-room-for-this-in-virginia-gov-youngkin-decries-vandalism-at-crisis-pregnancy-center/>

³⁵ <https://www.ksby.com/news/local-news/paso-robles-pregnancy-center-vandalized-police-say>

³⁶ <https://anarchistnews.org/content/jane%E2%80%99s-revenge->

App.7a

43. Heart to Heart Pregnancy Center³⁷, Cortez, Colorado, June 25, 2022
44. Options Health, Concord, California³⁸, June 25, 2022
45. Informed Choices Clinic³⁹, Iowa City, Iowa, June 25, 2022
46. Crossroads Clinic, Oklahoma City, Oklahoma, June 25, 2022
47. First Image⁴⁰, Portland, Oregon, June 26, 2022
48. LifeChoice Pregnancy Center⁴¹, Winter Haven, Florida, June 26, 2022
49. BirthRight, Burlington, Vermont, June 26, 2022
50. First Image, Portland, Oregon, June 27, 2022
51. Two Hearts Pregnancy Aid⁴², Everett,

%E2%80%93night-rage-communicate

³⁷ <https://www.catholicnewsagency.com/news/251667/more-catholic-churches-pregnancy-centers-and-a-pro-life-memorial-vandalized>

³⁸ <https://www.ncregister.com/cna/attacks-on-churches-pro-life-pregnancy-centers-continue>

³⁹ https://twitter.com/Ollie_XVX/status/1541107511151001600

⁴⁰ <https://www.anarchistfederation.net/crisis-pregnancy-center-donor-attacked/>

⁴¹ <https://www.theledger.com/story/news/local/2022/06/27/winter-haven-florida-lifechoice-pregnancy-center-vandalized-graffiti-janes-revenge/7744257001/>

⁴² <https://abolitionmedia.noblogs.org/post/2022/06/29/janes-revenge->

Washington, June 27, 2022

52. Women's Centers of Ohio, Dayton, Ohio, June 27, 2022
53. Pathways Pregnancy Center⁴³, Littleton, New Hampshire, June 28, 2022
54. Mother & Unborn Baby Care⁴⁴, Southfield, Michigan, June 24, 2022
55. Hope Clinic for Women⁴⁵, Nashville, Tennessee, June 29, 2022
56. A Woman's Friend Pregnancy Resource Clinic⁴⁶, Yuba City, California, June 29, 2022
57. Expectant Mother Care Frontline,⁴⁷ Brooklyn, New York, June 2022
58. Pregnancy Help Medical Clinic⁴⁸, Hialeah, Florida, July 3, 2022

[attack-on-anti-abortion-center-in-everett-wa/](#)

⁴³ https://www.wmur.com/article/vandalism-christian-pregnancy-center-littleton/40477153?utm_campaign=snd-autopilot#

⁴⁴ <https://www.clickondetroit.com/news/local/2022/09/23/pregnancy-resource-center-hit-by-vandals-in-southfield/>

⁴⁵ <https://www.newschannel5.com/news/police-investigating-attempted-arson-of-pregnancy-clinic-in-nashville>

⁴⁶ <https://www.sacbee.com/news/local/article263079863.html>

⁴⁷ <https://religionunplugged.com/news/2022/9/11/new-york-pregnancy-center-aims-to-provide-women-with-a-real-choice>

<https://theparadise.ng/pro-abortion-terrorist-group-janes-revenge-threatens-to-hunt-pro-lifers-at-homes/>

⁴⁸ <https://www.nbcmiami.com/news/local/pregnancy-clinic-in-hialeah-vandalized-with-spraypaint/2798854/>

59. Agape Pregnancy Center⁴⁹, Des Moines, Iowa, July 4, 2022
60. BirthRight of St. Paul, St. Paul, Minnesota, July 5, 2022
61. Care Net Pregnancy & Family Services of Puget Sound⁵⁰, Kenmore, Washington, July 5, 2022
62. Arches New Hope Pregnancy Center⁵¹, Moab, Utah, July 5, 2022
63. Pro-Life Union of Greater Philadelphia⁵², Oreland, Pennsylvania, July 6, 2022
64. Problem Pregnancy Resource Center⁵³, Worcester, Massachusetts, July 6, 2022
65. Clearway Clinic, Worcester, Massachusetts, July 6, 2022
66. Northeast Ohio Right to Life, Akron, Ohio, July 8, 2022

<https://www.thegospelcoalition.org/article/the-monday-after-roe/>

⁴⁹ <https://who13.com/news/fbi-offers-reward-for-fake-clinic-vandalism-at-pregnancy-centers/>

⁵⁰ <https://mynorthwest.com/3551776/kenmore-pregnancy-clinic-vandalized-as-similar-instances-continue-across-washington/>

⁵¹ <https://moabsunnews.com/2022/07/07/pregnancy-center-vandalized/>

⁵² <https://phlanticap.noblogs.org/janes-revenge-vandalized-pro-life-union-of-greater-philadelphia/>

⁵³ <https://www.wcvb.com/article/vandals-target-anti-abortion-crisis-pregnancy-centers-in-worcester-scrawl-janes-revenge-on-sidewalks/40543620>

67. Women's New Life Clinic, Baton Rouge, Louisiana, July 12, 2022
68. Alternatives Pregnancy Center⁵⁴, Sacramento, California, July 2022
69. Monroe County Right to Life, Tomah, Wisconsin, July 18, 2022
70. Northfield Women's Center⁵⁵, July 26, 2022
71. Coalition for Life⁵⁶, St. Louis, Missouri, July 27, 2022
72. Pregnancy Centers⁵⁷, Illinois, July 27, 2023
73. Abria Pregnancy Center⁵⁸, St. Paul, Minnesota, August 1, 2022
74. Compassion & Hope Pregnancy Center, Pocatello⁵⁹, Idaho, August 9, 2022

⁵⁴ <https://www.catholicnewsagency.com/news/251780/pregnancy-center-director-tells-congress-pro-life-work-worth-risk-of-attacks>

⁵⁵ https://www.southernminn.com/northfield_news/news/northfields-womens-center-vandalized-with-spray-paint-broken-window/article_654e931e-119f-11ed-bdf9-4f19ddb74cf1.html

⁵⁶ <https://www.riverfronttimes.com/news/resist-stl-infiltrates-anti-abortion-fundraiser-crashes-stage-in-bootyshorts-38221169>

⁵⁷ <https://www.cbsnews.com/chicago/news/gov-pritzker-signs-bill-outlawing-deception-crisis-pregnancy-centers/>
<https://www.inforum.com/news/minnesota/crisis-pregnancy-center-vandalized-in-st-paul>

⁵⁸ <https://www.twincities.com/2022/08/01/doors-broken-graffiti-left-behind-at-pregnancy-resource-center-in-st-paul/>

⁵⁹ <https://www.idahostatejournal.com/news/local/pocatello->

75. Bethlehem House of Western
Massachusetts⁶⁰, Easthampton,
Massachusetts, August 18, 2022
76. Alpha Pregnancy Care Center⁶¹, Schenectady,
New York, August 22, 2022
77. Pregnancy Care Center of Petoskey, Petoskey,
Michigan, September 4, 2022
78. Mother & Unborn Baby Care⁶², Southfield,
Michigan, September 16, 2022
79. Avail NYC⁶³, New York, New York, September
19, 2022

[pregnancy-center-vandalized/article_0d81c63a-5f7c-5b4f-8dc2-4dacc531594d.html](https://www.dailysignal.com/2022/08/18/pro-abortion-vandals-strike-pregnancy-center-in-massachusetts/)

⁶⁰ <https://www.dailysignal.com/2022/08/18/pro-abortion-vandals-strike-pregnancy-center-in-massachusetts/>

⁶¹ <https://www.lifenews.com/2022/08/25/radical-abortion-activists-vandalize-pregnancy-center-165th-case-of-pro-abortion-violence-this-year/>

⁶² <https://www.detroitcatholic.com/news/pregnancy-resource-center-in-southfield-vandalized-with-pro-abortion-threats>

<https://www.cbsnews.com/boston/news/worcester-womens-health-clinics-vandalized-clearway-clinic-problem-pregnancy/>

<https://www.cbsnews.com/boston/news/worcester-womens-health-clinics-vandalized-clearway-clinic-problem-pregnancy/>

<https://twitter.com/AFrazierLife/status/1545425105278406657>

<https://www.wafb.com/2022/07/12/womans-new-life-clinic-vandalized-police-say/>

<https://twitter.com/AFrazierLife/status/1545425105278406657>

<https://www.wafb.com/2022/07/12/womans-new-life-clinic-vandalized-police-say/>

⁶³ <https://www.foxnews.com/us/new-york-city-protesters-gather->

80. Bella Health + Wellness⁶⁴, Englewood, Colorado, September 24, 2022
81. HeartReach Pregnancy Care Center, Wasilla, Alaska, October 13, 2022
82. First Care Pregnancy Center⁶⁵, Minneapolis, Minnesota, November 11, 2022
83. Capitol Hill Pregnancy Center⁶⁶, December 2, 2022
84. Pregnancy Aid Detroit, Eastpointe⁶⁷, Michigan, December 17, 2022
85. Houston Pregnancy Center, Houston⁶⁸, Texas, January 29, 2023
86. First Care⁶⁹, Minneapolis, Minnesota, January 29, 2023

pregnancy-resource-center

⁶⁴ <https://www.catholicnewsagency.com/storage/image/denver-vandalism-1.jpg?w=600>

⁶⁵ <https://www.campusreform.org/article?id=20720>

⁶⁶ <https://mobile.twitter.com/CarolinaLumetta/status/1598491585162919936>

⁶⁷ <https://www.fox2detroit.com/news/pro-life-pregnancy-center-in-eastpointe-vandalized-board-members-home-also-targeted>

⁶⁸ <https://pregnancyhelpnews.com/when-you-re-on-assignment-from-the-lord-you-do-what-it-takes-center-undeterred-by-pro-abortion-attack>

⁶⁹ <https://www.cbsnews.com/minnesota/news/vandals-target-minneapolis-pregnancy-center/>

87. Compass Care Pregnancy Service⁷⁰, Buffalo, New York, March 15, 2023
88. Bowling Green Pregnancy Center⁷¹, Bowling Green, Ohio, April 15, 2023
89. Informed Choices Medical Clinic⁷², Iowa City, Iowa, April 19, 2023
90. JMJ Pregnancy Center⁷³, Orlando, Florida, May 10, 2023
91. First Choice Pregnancy⁷⁴ Center, Las Vegas, Nevada, July 24, 2023
92. LightHouse Pregnancy Center⁷⁵, Hackensack, New Jersey, October 6, 2023
93. ProLife Across America⁷⁶, Burlington, New Jersey, December 31, 2023

⁷⁰ <https://www.compasscarecommunity.com/2023/03/antifa-attacks-christian-pro-life-compasscare-in-buffalo-again/>

⁷¹ https://www.ohiolife.org/breaking_bowling_green_pregnancy_center_vandalized_by_abortion_group

⁷² <https://cbs2iowa.com/news/local/icpd-asking-for-help-in-vandalism-case>

⁷³ <https://www.foxnews.com/politics/florida-pro-life-pregnancy-center-targeted-with-decapitated-chicken-mutilated-lamb-ritualistic-attack>

⁷⁴ https://pregnancyhelpnews.com/media/k2/items/cache/78d3f08868d2b2dab244209bac283fa2_L.jpg

⁷⁵ <https://gottheimer.house.gov/posts/-gottheimer-launches-campaign-to-shutdown-deceptive-anti-choice-clinics-posing-as-womens-healthcare-providers-in-nj>

⁷⁶ <https://jerseycounterinfo.noblogs.org/forced-birth-billboard-defaced-in-burlington-county-nj/>

94. New Hope, Westwood⁷⁷, New Jersey, January 22, 2024
95. First Choice Women's Center⁷⁸, Jersey City, New Jersey, April 22, 2024
96. Aid to Women, Phoenix, Arizona, June 23, 2024
96. Massachusetts Pregnancy Centers⁷⁹ ⁸⁰, Boston, Massachusetts, June 24, 2024
97. Aid to Women Phoenix, Arizona, July 31, 2024
98. Aid for Women⁸¹, Chicago, Illinois, August 22, 2024
99. Salem Pregnancy Care Center⁸², Winston-Salem, North Carolina, September 2, 2024

⁷⁷ <https://www.cbsnews.com/newyork/news/josh-gottheimer-abortion-crisis-pregnancy-center-funding-bill/>

https://www.frontiersman.com/news/vandals-strike-pregnancy-care-center-local-church/article_f47bccc4-5032-11ed-b19b-9b58beefd16c.html

⁷⁸ <https://gottheimer.house.gov/posts/release-in-jersey-city-gottheimer-sounds-the-alarm-on-deceptive-anti-choice-clinics>

⁷⁹ <https://www.mass.gov/news/healey-driscoll-administration-launches-first-in-the-nation-public-education-campaign-on-the-dangers-of-anti-abortion-centers>

⁸⁰ https://www.youtube.com/watch?v=SSS4jK_GWKs&ab_channel=CBNNews

⁸¹ <https://www.washingtonexaminer.com/opinion/3133089/chicago-pregnancy-center-vandalized/>

⁸² <https://www.liveaction.org/news/pregnancy-center-north-carolina-vandalized/>

100.HeartReach Pregnancy Care Center⁸³,
Wasila, Alaska, October 2024

⁸³ <https://alaskapublic.org/2024/11/08/fbi-seeks-suspect-who-painted-swastikas-on-wasilla-pregnancy-center/>