

# **SPECIAL REPORT:**

## **Widespread Abortion Abuses Discovered at Texas Abortion Facilities**

**By Operation Rescue®**

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# Special Report: Widespread Abortion Abuses In Texas Exposed

Produced by Operation Rescue®

A full multi-media version is available online at [OperationRescue.org](http://OperationRescue.org).

Austin, Texas — From December, 2010 through February, 2011, Operation Rescue conducted an investigation of a dozen Texas abortion clinics and obtained hard evidence of violations of both State and Federal laws at each and every facility.

“This investigation shows that violations of the law at abortion clinics are a widespread crisis of epidemic proportions,” said Operation Rescue President Troy Newman. “The evidence we uncovered of illegal activity reveals a systemic problem throughout Texas that is not confined to one particular clinic or group of clinics. These violations endanger the health of women, violate the rights of women to be informed and have their medical records protected, and present health hazards to the general public. We also found disturbing evidence of attempts to evade parental consent laws and child sex abuse reporting laws. This illegal activity endangers the safety and welfare of children throughout Texas.”



This is the rear entrance to Whole Women's Health, an abortion clinic in McAllen, TX. It is in a gross state of disrepair. Many of the violations discovered during a three month investigation were from this clinic.

## Introduction

The abortion clinics that were subject of this investigation were randomly chosen. Investigators and researchers engaged in undercover telephone calls and visits to the clinics posing as the everyday woman seeking an abortion. In addition, trash that had been discarded by the abortion clinics was collected, sorted, and documented.

“Our investigation focused on what the average woman would experience if she sought an abortion in Texas, and how the abortion clinics appeared and operated on an everyday basis,” said Newman. “From what we found, women are subjected to a variety of abortion abuses as a matter of routine. Violating the law is standard operating procedure for abortion clinics in Texas.”

Most of the violations fell into five broad categories:

- **The illegal disposal of hazardous bio-medical and infectious waste**, including human urine, blood, and tissue that were recovered from open trash bins, along with the discovery of dirty and poorly maintained conditions inside the abortion clinics.

- **Drug violations** through the illegal disposal of vials still containing controlled substances that were found mixed in with bloody waste from the abortions.
- **Massive violations of the Federal Health Insurance Portability and Accountability Act (HIPAA)**, which is designed to protect the privacy of patients and their medical information. Patient names, addresses, and other sensitive information was discovered and recovered that had been illegally dumped or discarded by the abortion clinics.
- **Widespread abuses to the Texas mandated informed consent laws**, where abortionists were recorded mocking the information or giving the information in such an inaudible manner that patients are heard on the recording complaining that they could not understand a word that was being said. This includes violations of the 24-hour waiting period.
- Undercover calls and visits to the abortion clinics revealed a pattern of willingness to help minors **evade parental consent laws and ignore the mandatory reporting of child sex abuse**.

“There is little doubt based on the evidence that crimes have been committed. We will be turning over all of the evidence we collected to the Attorney General’s office for his review,” said Newman.

There is little wonder that abortion abuses were found at every clinic that was investigated, considering the checkered backgrounds of the abortionists that operate them. At the twelve abortion clinics subject to this investigation, fifteen abortionists were identified as being associated with them. Of that fifteen, eight abortionists were found to have egregious records of illegal or unethical conduct including the following:

- Big-money malpractice lawsuits and/or settlements.
- Lost, revoked, suspended, or surrendered licenses in several states.
- Current personal injury lawsuits.
- Medical board actions and corrective orders for professional misconduct.
- Administrative penalties and fines for failure to comply with state regulations.
- No hospital privileges.
- Delinquencies in medical licensing.
- Federal conviction and ban from Medicaid, Medicare participation.
- Frequent use of unlicensed surgical assistants.
- Failure to have a licensed nurse or qualified employee present during the absence of an administrator.
- Death of female abortion patient.



Bloody refuse, including cannulas used to suction apart pre-born babies and even human tissue was found illegally dumped.

Of the remaining seven abortionists, for which no previous record could be found, each of them was identified with violations during this investigation.

The investigation yielded the following evidence, now in the possession of Operation Rescue:

- Human flesh remains from abortion, illegally dumped in the trash.
- Non-flesh abortion procedure waste (blood and suction tubes and syringes), illegally dumped in the trash.
- Urine cups with names and birth dates of patients clearly marked, illegally dumped in the trash.
- Dozens of sonograms with parental names clearly identifiable, infringing on patient privacy and violating HIPAA.
- Numerous patient charts, receipts, ledgers, and other private medical paperwork with full names, birth dates, addresses and phone numbers, financial information, procedure details and more.
- Recorded audio of clinic worker at Whole Women's Health in McAllen telling the boyfriend of an underage pregnant girl that she will not report him for rape. (In Spanish)
- Recorded conversations from Whole Women's Health conference calls of abortionists West, Molson, Randal and Kini making statements mocking informed consent laws, the TX legislature and the TX Dept of Health website with abortion info.
- Recorded instructions from abortionist West saying it will be "fine" for a woman to come to the clinic for her abortion in less than 24 hours, clearly violating Women's Right to Know Act which specifies, "After you get this information, your doctor must wait 24 hours before your abortion can be performed."
- Recorded audio of supposed "24-hour" right to know conference calls in which the abortionist is unintelligible and does not respond to patients requests to repeat information or speak clearly, and where the abortionist never comes on the line, both of which violate the patients' legal rights.
- Recorded conversation with clinic worker in San Antonio instructing a 15-year-old how to get a judicial bypass and avoid the parental consent requirement.

**A Photo Gallery has been created with pictures that document the physical evidence and is available for viewing at [OperationRescue.org](http://OperationRescue.org)**

### **Illegal dumping of biohazard/infectious medical waste**

Found in improperly discarded trash outside Whole Women's Health in McAllen, Texas, large packets of material wrapped in blue paper with labels that noted the date of the abortion and other notations. Inside the packets were bloody tubing, cannulas, and gauze pads wrapped in large blue paper closed with masking tape bearing the date of the abortion.

Some of the packets also contained human tissue that appeared to be partial remains of aborted babies left to putrefy in the open dumpster where animals or people could encounter it.

## Drug violations

Medication vials of I.V. and injectable drugs were found in the dumpsters mixed with packets containing the bloody refuse from abortions. Some of those bottles were still partially full. Drugs included injectable versions of the following:

- **Lidocaine**, a numbing drug that has caused death in abortion patients.
- **Methergine**, which is applied to the uterus to control bleeding.
- **Midazolam**, (Versed), a drug that depresses the nervous system.
- **Others**.



Drug vials were found in the open trash outside a McAllen, TX abortion mill. Some bottles still contained substantial amounts of the substances.

There was a concern that children or others could have discovered the partially filled drug vials and suffered serious injury if they had ingested any of it. Also discovered were empty prescription slips that could have been misused to illegally obtain prescription drugs. The dumping of these items shows a gross disregard for public health and safety.

## HIPAA Violations/Illegal Medical Record Dumping

The Federal government has enacted the Federal Health Insurance Portability and Accountability Act (HIPAA), which is designed to protect the privacy of patients and their medical information. Records that contain medical information and patient identification must be properly stored or disposed in such a way as to protect the privacy of patients.

Abortion promoters often make a public case that abortion records are particularly private. In Kansas, a three year politically motivated legal battle ensued over law enforcement subpoenas for abortion records for the purpose of investigating the sexual abuse of children. In the end, law enforcement had to drop its attempts to ensure the safety of underage girls who had abortions in Kansas because it was denied access to the children's names in the interest of protecting their privacy.



Dumpsters behind Whole Women's Health were open and spilling trash. Infectious waste and other hazardous materials, and private medical records were illegally dumped there.

Hypocritically, abortion clinics in Texas were shown to have a lack of concern for patient privacy.

In at least nine cases, full documents were dumped containing such detailed information as patient name, the name of her escort to the abortion clinic, the date of her abortion, whether she was a return patient, the cost of her abortion and how it was being funded, gestational age of her pre-born baby, and the patient's referral source.

As a matter of routine, the abortion clinics that were investigated in Texas illegally dumped records and even cups of urine with the abortion patient's name, birth date, and other information. Full and partially shredded ultrasound records were found with patient identifying information on them.

### NAF Connection

Some of the abortion records illegally dumped by Whole Women's Health, indicate that the National Abortion Federation (NAF), paid a portion of the cost of some abortions.

All five Whole Women's Health abortion clinics in Texas, as well as one location in Baltimore, Maryland, are members of the NAF, according to both the WWH and the NAF websites. In fact out of the twelve abortion clinics that were subject of this investigation, half of them belong to the NAF, while at least one other non-affiliated clinic employed an NAF abortionist.

Due to their involvement with the majority of abortion clinics that were found to have violations during this investigation, it is recommended that the NAF be held criminally responsible along with the offending abortionists and clinics for these illegal and unethical acts.

circle one)	surgical abortion abortion pill	follow-up gyn visit	pregnancy test other: _____
Level 3 (125 min)	99212	Repeat	
Level 4 (140 min)	99213	Contraceptive Measures	Mirena IUD/Paragard IUD IUD Insertion/Removal
intra	50199	Prescriptions	Methergine 0.2 mg Doxycycline 100 mg #14 Tylenol 300mg #10 Naproxen
r intramuscular	90772	ICD -9 Codes (Diagnosis Codes)	Abortion
	A4580		Elective Mixed Abortion
	88300	Post-Op Exam	Pregnancy
	99401/99402		Suppressed Menstruation Test (negative, positive)
	99024	Pre-Op Exam	Rh Incompatibility Contraception Surveillance Nava Ring, Implant IUD Insert, Check, Removal Implant Insert, Removal
	36416		
	81025/83519		
	85018		
	86901		
	64435		
	11053		
	90385/90384		
	50190/50191		
IV usage	13010/12250		
n IV usage	12300/83360		
Res.	99144		
	12590		
Today's Charges	Cash	Money Order/ Check	Credit Card V8/MC/DB/AM
350	245		Funding NAF 105

This form, which included patient identifying information shows that the NAF paid the Whole Women's Health abortion clinic for part of the cost of an abortion. (Click to see entire document.)

### Filthy and Unsafe Clinic Conditions

The abortion clinics themselves were in various stages of uncleanness and disrepair. Bathroom conditions were particularly appalling. Some clinics had one bathroom that was shared by men and women, including post-surgical abortion patients. Bloody smears could be seen on the toilet and other areas of the McAllen Whole Women's Health clinic. Faucets were corroded and leaking.

Poor lighting in the waiting and examination areas was the result of numerous burned out bulbs. A leaky roof had damaged the ceiling and created the possibility of an



This corroded and leaky faucet is in the only bathroom at Whole Women's Health in McAllen, TX.

unhealthy mold infestation.

## **Gross Disregard for Informed Consent laws**

Informed consent was another area where Whole Women's Health and other abortion clinics displayed excessive problems. Women scheduled for abortions were given phone numbers and access codes for participation in a conference call the day before their abortions where a licensed physician was supposed to be live, on the line to give them the information mandated by State Law and answer questions.

The abortionists generally showed resentment toward the law and a complete disrespect for women and their right to know the risks of abortion. Some abortionists openly refuted the state mandated information, particularly concerning abortion's breast cancer connection and risk of future infertility. Others left out some information completely, such as the fact that Texas law states that if a woman decides to keep her baby, the father must pay child support even if he has offered to pay for the abortion. In some cases, the abortionists did not allow questions, as required by law. Others simply played recordings and were not live on the call at all. Patients of second trimester abortions were given the same information as first trimester abortion patients, even though the procedures are vastly different.

During one conference call recorded on January 10, 2011, abortionist William West of Whole Women's Health can be heard mocking the information he is required by law to tell women. After he says that he is required to say that abortion presents a risk for breast cancer, he launches into a mocking rebuttal of the information he just told them.

“The anti-abortion folks have waged this fear campaign for years now, um, making numerous false charges about the quote dangers of abortion, and uh, one completely fictitious this is drummed up spread allaround is that there is an increased risk of breast cancer and interference with future childbearing and so forth. None of these are true. It's their attempt to scare you out of having an abortion.”



This abortion chain, Whole Women's Health operates five abortion clinics in Texas, and were among the worst in patient privacy, informed consent, and clinic conditions.

“If this does not violate the letter of the law, it certainly undermines the intent of the legislature, which determined that women should have certain information on which to make an informed decision,” said Newman. “It is his remarks that are grossly untrue, and he should be held accountable for misleading women about abortion risks.”

Later in that same call, one woman expresses concern that her appointment is not 24 hours from the time of the conference call, as required by law.



**Caller:** Hello?  
**West:** Yes.  
**Caller:** My appointment is tomorrow morning and if I called now, is this enough time?  
It's less than 24 hours.  
**West:** Yes.  
**Caller:** And that'll be okay?  
**West:** Um-hm.  
**Caller:** Thank you.

In addition, West did not give the web address to the Texas Department of Health website as required by law.

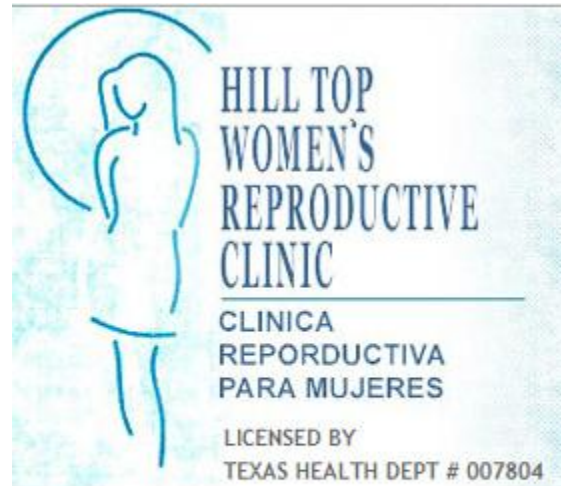
Other calls required by informed consent legislation were so unintelligible that patients expressed concerns that they could not understand anything that was being said.

**Caller 1:** We can't understand you!  
**Another voice:** Hello! The conference is over.  
**Caller 1:** We don't understand anything he's saying.  
*[Other patients agree]*  
**Caller 1:** How can we ask questions about anything? We can't understand what he's saying.  
**Caller 1:** Nobody can understand what he's saying. They should get someone who can speak better. We can't understand what he's telling us. He's telling us so many things and we don't know what he's saying. He's speaking Pakistan and we're in America, right?  
**Another voice:** Is the conference over?  
**A different voice:** That was Spanish.  
**Another woman:** Yeah the conference is over.  
**Caller 1:** This is really not funny. I mean I don't, no one, we can't understand what he's—the information...  
**Clinic Worker:** Okay, if you didn't understand anything the physician said, you're more than welcome to listen to a recording available at 5:30 in the afternoon. You have already complied with the Texas Department of Health.  
**Someone else:** And when you call back MUTE your phones so that there's no background noise.  
**Caller 1:** It's not the background noise. I can't understand him.  
**Caller 1:** But at 5:30 I'm gonna call back to hear the same recording, so whatever.  
**Clinic Worker:** It's your decision... You've already complied. So I mean, basically, that's all you need.

## Coaching Minors to Evade the Law

One undercover conversation with a receptionist named “Lupa” at Franz Theard’s clinic, Hill Top Reproductive, in El Paso was particularly disturbing. The caller posed as a 17-year old minor who wanted an abortion. The receptionist quickly scheduled an abortion for her for the following Saturday at 9:00 am and told her to bring an I.D. and \$460. That is when the call took a disconcerting turn.

**Caller:** Can I get a note from the doctor? Um...  
**Lupa:** Why?  
**Caller:** For school?  
**Lupa:** [Unintelligible]—school?  
**Caller:** ‘Cuz I’m still in high school.  
**Lupa:** How old are you?  
**Caller:** Seventeen.  
**Lupa:** If you’re 17, your parent needs to come with you.  
**Caller:** Oh, uh, I don’t want the—  
**Lupa:** Do they know you’re pregnant?  
**Caller:** No. No.  
**Lupa:** We have another clinic. It’s in Sunland Park in Santa Teresa—  
**Caller:** Santa Theresa where?  
**Lupa:** Uh-huh. There you don’t need an appointment and you don’t need your parents. You could go on Tuesday.  
**Caller:** On Tuesday? Oh.  
**Lupa:** Yes, and it will be at 1:30.  
**Caller:** 1:30? With the same doctor?  
**Lupa:** Yes, ma’am.  
**Caller:** Okay. So on Tuesday, in Santa Teresa I can go—?  
**Lupa:** —address?  
**Caller:** I need the address.  
**Lupa:** It’s 5290 McNutt Road.



Hill Top may be licensed in Texas, but its staff are more than ready to refer El Paso, TX, teens across state lines to their nearby clinic in Santa Teresa, New Mexico, in order to avoid complying with Texas law.

Lupa then assures the caller that she will see Dr. Theard and that she does not need to tell her parents.

Santa Teresa is a community across state lines from El Paso in New Mexico, where abortion laws are essentially non-existent. It has become obvious that Theard keeps this clinic open for the purpose of circumventing Texas abortion laws that require minors must have the consent of their parents before abortions can be done.

“If encouraging a minor to cross state lines to evade the laws of her home state isn’t illegal, it ought to be,” said Newman. “Those laws were enacted to protect young girls and to protect the integrity of the family and parental rights. Theard is openly defying the intent of the Texas

legislature and trampling the rights of parents while profiting off the vulnerability of their underage daughters. It's really quite despicable.”

### **Mum's the Word on Child Rape**

In one undercover conversation, a Spanish speaking man called the Whole Women's Health abortion clinic in McAllen and inquired about an abortion for his underage girlfriend. A staffer tells him that his girlfriend needs a judicial bypass, and gives him detailed instructions on how to obtain one so her parents will not find out. The court process for judicial bypass takes 2-3 days. At the end of the call, the staffer assures the male caller that she will NOT report him to anyone.

In another call, an investigator posing as a 15-year old girl spoke with a clinic employee named Melissa at Whole Women's Health in San Antonio reveals the ease with which an underage girl can get a judicial bypass for just about any reason. Below is a partial transcript of relevant portions of the call.



The Courthouse in McAllen, TX where judges dish out judicial bypasses, even apparently to underage girls coached by abortion clinics how to cover up for their sexual abusers.

**Caller:** ...so, like it doesn't matter if my boyfriend's over 21 or anything?

**Melissa:** No.

**Caller:** It's confidential, you won't report anything?

**Melissa:** Even if you get a judicial bypass, everything is confidential. We don't release any of your information to anybody.

*[Later in the call, the worker slightly modifies her story, but the conversation remains confusing on this point.]*

Clinic worker Melissa had *never* seen a judge deny a judicial bypass. From this, it appears that judges are abusing the judicial bypass option and are not digging deep enough into what is really going on with underage girls in order to make a determination if she is being coerced or is covering up for an adult boyfriend. This idea of looking the other way and simply rubber-stamping abortions leaves minor girls at continued risk of sexual abuse and exploitation by older men – all to be kept secret from their parents, the people who likely care about the girls the most.

### **Conclusion**

From evidence found during this three-month investigation of a random sampling of twelve Texas abortion clinics it is clear that there is a widespread problem with abortion clinics failing to comply with state and federal law and with state and local health codes.

Texas has many good laws that were enacted to protect women from abortion abuses. Unfortunately, there has been a gross lack of oversight and enforcement on the part of state

authorities that has created an atmosphere where abortionists can openly flout the law with impunity and with no consequences.

Such a regulatory collapse in the State of Pennsylvania led to conditions where someone like abortionist Kermit Gosnell, who was recently arrested and charged with eight counts of murder, after a grand jury discovered that he was running what they described as a squalid “charnel house.” Texas comes very close to regulatory failure uncovered in Pennsylvania.

As of this writing, Operation Rescue is in the process of filing complaints with the Texas Medical Board against each abortionist involved in violations. A complaint has already been filed with the Texas State Department of Health. An investigation is underway. All evidence of crimes collected during this investigation is currently scheduled to be turned over to the custody of the Texas Attorney General’s office on March 2, 2011.

**We call on the State of Texas to make the following changes:**

- **Increased oversight:** Abortion clinics must be routinely subject to surprise inspections. The Texas Medical Board and Department of Health needs to do better in ensuring that abortionists and their clinics meet legal and safety requirements. Those that are unable or unwilling to come into full compliance should be shut down.
- **Strict enforcement of existing laws:** When criminal conduct is discovered, charges should be filed. If the law has no teeth, there will never be compliance, and women will continue to be subjected to filthy and shoddy treatment that not only disrespects them as human beings, but endangers their health and safety.
- **Additional legislation with stronger penalties for noncompliance:** Texas needs to tighten up regulations to eliminate the abuses discovered in this investigation, especially concerning the coaching of minors and their adult abusers how to avoid being reported for child sex abuse. Also, laws should be enacted to halt the referral of minors over state lines to avoid parental consent laws in Texas in order to protect minor girls from exploitation, protect parental rights, and protect the integrity of the family.
- **Inform the Judges:** Those involved in judicial bypasses must be made aware that minor girls are being coached to abuse the system and protect underage sexual relationships. Judges must guard against the process being misused to keep underage child sex and the possibility that a child is being sexually exploited secret from caring parents.
- **Investigate the National Abortion Federation:** The NAF is a national association of abortion clinics that is purported to adhere to strict abortion standards. However, we have found from this and other investigations in other states that NAF clinics appear to be among the worst violators in the nation. While claiming to self-police, then instead are more likely to excuse and cover up abortion abuses that endanger the public safety. This disturbing trend of NAF clinic abuses should be investigated at the state and federal levels.

*[Note: audio files of all conversations mentioned in this report are available online at [OperationRescue.org](http://OperationRescue.org).]*

# DISCOVERIES OF TEXAS ABORTION ABUSES

Investigation conducted December, 2010-February, 2011

Facility	Abortionists/Record of Abuse	Violations*
<b>Whole Women's Health of Austin</b> 8401 N. I.H. 35 Austin, TX 78753 (NAF member)	Margaret Kini/NO Brook Randal/NO	1. Illegal disposal of medical waste 2. Illegal disposal of private patient information and/or records
<b>Whole Women's Health</b> 440 18th St. Beaumont, TX 77706 (NAF member)	Robert Hanson/YES (Patient Death) Sherwood Lynn/YES	1. HIPAA violations. 2. Illegal dumping of biohazard/medical waste
<b>Whole Woman's Health</b> 1717 S. Main St. Fort Worth, TX 76110 (NAF member)	Jasbir Ahluwalia/YES Alan Molson/YES William West/YES	1. HIPAA violations. 2. Illegal dumping of biohazard/medical waste 3. Right to Know law information openly mocked and said to be untrue (West)
<b>Whole Women's Health of McAllen</b> 802 S. Main St. McAllen, TX 78501 (NAF member)	Lester Minto/YES Pedro Kowalyszyn/YES	1. HIPAA violations. 2. Illegal dumping of biohazard/medical waste
<b>Whole Woman's Health</b> 4025 E Southcross Blvd San Antonio, TX 78222 (NAF member)	Lamar Robinson/YES	1. HIPAA violations. 2. Illegal dumping of biohazard/medical waste
<b>Hilltop Women's Reproductive Clinic</b> 500 E. Schuster, Edificio B, El Paso, TX 79902	Franz Theard/NO	Does abortions on TX minors in New Mexico, forcing them to cross state lines to evade parental consent laws in TX.
<b>Routh Street Women's Clinic</b> 4321 N. Central Expressway Dallas, TX 75235 (NAF member)	Jasbir Ahluwalia/YES William West/YES	1. Did not report statutory rape 13 yr old with a 24 yr old man. 2. Told minor she should tell her mom but did not take action to reporting it.
<b>Abortion Advantage</b> 1929 Record Crossing Rd. Dallas, TX 75235	Lamar Robinson/YES Arthur John Brock/NO Robert L. Prince	Failed to ask questions and did not report sexual abuse of caller who indicated she was 13 yr old and impregnated by older man.
<b>New Women's Clinic</b> 417 San Pedro Ave. San Antonio, TX 78212	Robert A. Westbrook, Jr./NO	1. Filthy clinic with rancid, foul smell. 2. Toni (Nurse) encouraged girl posing as 13 yr old to lie about statutory rape, lie to a judge to get a judicial bypass for an abortion.
<b>Planned Parenthood</b> 104 Babcock Rd. San Antonio, TX 78201	Unknown	HIPAA violations: Urine cups in trash can of restroom with patient info
<b>Woman's Choice Quality Health</b> 920 San Pedro Ave. # 100 San Antonio, TX 78212	Marco Antonio Lopez, Jr./NO	Dirty, leaky roof, damaged ceiling
<b>Northpark Medical Group</b> 8363 Meadow Rd. Dallas, TX 75231 (NAF member)	Robert L. Prince Arthur John Brock/NO Alan Molson/YES Robert Hanson/YES (Patient Death)	Violations of informed consent law. (Recording only with no one to answer questions.)

## Legal and health violations at abortion locations in TX:

- Failure to comply with state-mandated 24-hour Women's Right to Know Act for abortion, by knowingly advising patients to come for abortion procedures and sign forms saying they received required information even though it was obtained less than 24 hours in advance.
- Failure to openly provide state-mandated resources to abortion patients, by referring them to the Whole Women's Health website exclusively, and not also the TX Dept of Health website for information about abortion. (On certain recorded 24 hour informed consent calls.)
- In violation of Texas Administrative Code 25 RULE §330.1207 Generators of Medical Waste
- In violation of Texas Administrative Code 25 RULE §330.1219 Treatment and Disposal of Medical Waste
- In violation of Texas Administrative Code 25 RULE §1.136 Approved Methods of Treatment and Disposition
- Possible violations of other sections of Texas Administrative Code in relation to the storage, treatment, disposal, transportation, and identification of medical waste
- In violation of the United States Code of Federal Regulations 49 CFR 173.174 - Class 6, Division 6.2 regarding medical, infectious and biohazardous waste.
- In violation of the Federal Health Insurance Portability and Accountability Act (HIPAA)
- Possible building/health facility code violations with poor/insufficient lighting, co-ed bathrooms in procedure areas that surgical patients are expected to use, roof leakage, water damage in restrooms, and bloody residue in common restroom facilities.
- Improper identification of very young office staff and medical assistants who do not wear badges, nametags, or certification to verify medical training.
- Encouraging minors to cross state lines to avoid Texas parental notification laws.
- Coaching boyfriends and minor girls how to evade child sex abuse reporting laws



A full report on a three-month investigation of Texas abortion clinics can be found at <http://www.operationrescue.org/archives/tx-abortion-abuses>.

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