

STATE OF MICHIGAN  
DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30755  
LANSING, MICHIGAN 48909

**BILL SCHUETTE**  
ATTORNEY GENERAL

May 19, 2016

Heritage Clinic, P.C.  
Attn: Thomas J. Gordon, Resident Agent  
320 E. Fulton Street  
Grand Rapids, MI 49503

Re: Content of Heritage Clinic Advertisements

Dear Sir:

Our office has received a complaint regarding the accuracy of certain statements contained on Heritage Clinic, P.C.'s (Heritage) website. According to Heritage's corporate filings with the State of Michigan, Heritage was incorporated to provide medical services in 1987. However, Heritage's website indicates that it has been providing medical care and services since 1973.

Advertising that is false, deceptive, or misleading is unlawful and prohibited under various provisions of the Michigan Consumer Protection Act. Likewise, Section 16221 of the Public Health Code identifies false or misleading advertising as an unethical business practice. Additionally, Section 33 of the Michigan Penal Code prohibits false, deceptive, or misleading advertising.

In order to ensure compliance with Michigan law, I am requesting that you provide and explain all facts supporting the following statements from Heritage's website:

- "Professionals Dedicated to Providing Quality Care Since 1973"; and
- "Heritage Clinic for Women has been offering gynecological care and abortion services in Grand Rapids, Michigan since 1973."

Please provide me the requested information within three (3) weeks from the date of this letter. If you have any questions or would like to discuss this matter further, please do not hesitate to contact me.

Heritage Clinic, P.C.

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May 18, 2016

Thank you for your anticipated cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "W. R. Bloomfield". The signature is fluid and cursive, with a large initial "W" and "B".

William R. Bloomfield  
Assistant Attorney General  
Corporate Oversight Division  
(517) 373-1160

HERITAGE CLINIC, P.C.  
THOMAS J. GORDON, M.D., RESIDENT AGENT  
320 FULTON ST E  
GRAND RAPIDS, MICHIGAN 49503  
616.458.3694

June 6, 2016

William R. Bloomfield  
Assistant Attorney General  
Corporate Oversight Division  
P.O. Box 30755  
Lansing, Michigan 48909

Dear Mr. Bloomfield:

This letter is a response to correspondence received from your office dated May 19, 2016 requesting factual information regarding certain statements made in the URL [www.heritageclinic.com](http://www.heritageclinic.com). The following is a brief synopsis of the evolution of Heritage Clinic, P.C. dba Heritage Clinic for Women.

Heritage Reproductive Health Care Clinic founded by a local Grand Rapids physician, provided a range of reproductive health care services and in 1973 began providing pregnancy termination services. In August of 1984 I, Thomas J. Gordon, M.D., began providing pregnancy termination services at the Clinic on a contractual basis in addition to my own practice of Obstetrics and Gynecology. In the month of April 1986 I acquired Heritage Reproductive Health Care Clinic. The services that I provided included Obstetrics and Gynecology and pregnancy terminations. In October of 1986 the clinic obtained P.C. status in the State of Michigan and the name was then changed to Heritage Clinic, P.C.

In the month of September 1988, Heritage Clinic, P.C. acquired the New Clinic for Women. This clinic provided both Gynecological and pregnancy termination services similar to those provided at Heritage Clinic, P.C. The two clinics existed as separate entities until January 1989 when they were merged into a single entity legally named Heritage Clinic, P.C. dba Heritage Clinic for Women.

Throughout the years beginning as far back as 1973 the medical services were provided by professionals including Medical doctors, Obstetricians & Gynecologists, Registered Nurses, Counselors, some with advanced degrees, Medical Laboratory Technologists and Certified Medical Assistants.

The name of the facility rendering services has changed over the years however the type of services provided and the commitment and high quality of health care provided by the current professional staff at Heritage Clinic for Women continues.

Best regards,



Thomas J. Gordon, M.D.  
Resident Agent