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May 24, 2023

Attorney General Mike Hilgers
Nebraska Attorney General's Office
2115 State Capitol
PO Box 98920
Lincoln, NE 68509

Dear Attorney General Hilgers:

Please accept this letter as a formal complaint against C.A.R.E., 1002 W Mission Ave., Bellevue, NE 68005, the former abortion clinic of the late Leroy Carhart, who died April 28, 2023.

On May 2, I received an email from ██████████ (Exhibit A), ██████████ ██████████ notified us of illegal activity at his former clinic that was to take place on May 3, 2023. ██████████ stated the following in the enclosed email:

“Tomorrow patients will illegally be seen at the Bellevue clinic under Dr Carhart’s DEA license, and pharmacy. As you are aware he is dead. The new medical director, Tyrone Malloy MD is not registered in Nebraska and has previously lost his medical license for fraud. His colleague will see patients, and she is not a dispensing physician. The clinic license is no longer active following Dr Carharts death.”

I have since verified through a colleague who ██████████ the alleged illegal activity, May 3. ██████████ observe clients entering the building that day with the help of clinic escorts, who are only present on days when abortions are provided. Because ██████████ perceived it be incredibly strange so soon after Carhart’s death, ██████████ secured a 30-minute video of what ██████████ saw that day. I understand ██████████ has sent that to you with ██████████ own complaint.

Please investigate what occurred on May 3 at 1002 West Mission Avenue in Bellevue, Nebraska. It is my understanding that the clinic is currently operated by the late Carhart’s daughter who has no experience managing any type of medical practice.

Were medication abortions performed that day? And if so, who administered the drugs, and under what DEA/controlled substances licenses? Carhart’s state narcotics license #1001881 was rendered null and void effective 4/28/23, the day of his death, prior to the alleged illegal abortions on May 3.

If what has been alleged is true, and the administrator and abortion provider(s) get away with it, then the clinic will continue to operate illegally, putting Nebraska women at grave danger. This clinic already has a reputation, under the late Carhart, for endangering the lives of women. In fact, two women died under his “care.”

Just this week, I became aware of another former employee of the clinic, Xaunna Krehn, who included information about her role at C.A.R.E. on her 2022 Nebraska application (Exhibit B) for reinstatement of her medical license. She stated the following:

Attending Physician at CARE Clinics Bethesda MD/Bellevue NE (June 2020-November 2020)

Provided full-service reproductive health care and primary care for patients. Converted both clinics from paper charting to electronic charting. Outpatient setting, 10-20 patients/day. AdvancedMD EMR. *Left this job due to the clinic director, Lee Carhart, breaching my contract, not providing me with malpractice, as well as practicing unsafe medicine well outside of current guidelines.*

Thank you in advance for addressing these extremely important concerns. I look forward to hearing back from you concerning the actions taken.

Warm Regards,

[REDACTED]

CC: [REDACTED] Life Legal Defense Foundation