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CITY BAR

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July 19, 2016

Hon. Bill de Blasio
Mayor of the City of New York
City Hall
New York, New York 10007

Re: New York City Abortion Clinic Buffer Zones

Dear Mayor de Blasio,

On behalf of the Sex and the Law Committee of the New York City Bar Association¹, we are writing to express our concern regarding the increasing levels of harassment, intimidation and outright physical obstruction by protesters at reproductive healthcare clinics in the New York City area. As you are aware, stand-alone reproductive healthcare clinics are a vital resource for women, especially in underserved communities, in need of access to affordable comprehensive reproductive and sexual healthcare information and services. We urge you to take immediate action to ensure compliance with the laws that guarantee full and safe access to reproductive health care services.

Both the federal Freedom of Access to Clinic Entrances² and the New York State Clinic Access Act³ give patients and staff the right to be free from force, threats of force, or physical obstruction when trying to obtain or provide reproductive healthcare services. In addition, New York City law sets a 15-foot zone in front of clinics in which similar types of illegal behavior by protesters faces increased penalties.⁴ Unfortunately, though, despite these protections, abortion clinics as well as their staff and patients continue to experience increasingly aggressive attacks.

According to the 2014 State of Clinic Access in New York City Report⁵, there was an increase in the number of incidences of protesters blocking clinic entrances, directly interfering

¹ The Sex and Law Committee addresses issues pertaining to gender and the law. Committee members work and practice in a variety of areas, including, violence against women, reproductive rights, gender discrimination, poverty, matrimonial and family law, employment law, and same-sex marriage.

² 18 U.S.C. § 248 (1994).

³ N.Y. Penal Law §§ 240.70-240.71 (2010).

⁴ N.Y.C. Admin. Code Title 8, Ch. 8, §§ 8-801-8-807 (2010).

⁵ Report compiled based on information received from Choices Medical Center, Inc., Dr. Emily Women's Health Center, NARAL Pro-Choice New York, National Organization for Women – New York City, The New York Civil

with patients on their way to the clinic, and creating an intimidating and hostile atmosphere for patients and staff by blocking clinic entrances, hurling threats of bodily harm and racial epithets at patients and staff, and, on at least one occasion, assaulting a patient escort. In one incident last year, at the Choices clinic in Queens, approximately 15 protesters crowded a woman walking to the clinic. She started crying, dropped to the ground and the volunteer escorts helped her up and inside the building. This caused the protestors to scream that the clinic was “dragging a crying woman into the clinic.”⁶ On another occasion last year, a protester pushed a clinic escort to get to a patient.⁷ And on yet another occasion, a group of protesters threatened the volunteer coordinator by name, saying “you’re going to kick the bucket soon” and “we’re praying for you to repent.”⁸

Our recommendations include, but are not limited to, the following:

- Prioritizing and investing city resources to develop and implement training programs on how to identify clinic access law violations for law enforcement in precincts surrounding reproductive health care centers;
- Working more closely with city law enforcement for the purpose of ensuring more effective enforcement of the current clinic access law;
- Creating an infrastructure for better monitoring and reporting of clinic access law violations; and
- Developing a task force to periodically review the status of protester activity around reproductive healthcare centers and make recommendations for addressing violations of current clinic access laws

On a statewide level, Attorney General Eric Schneiderman has expressed his commitment to protect the civil rights of both patient and providers at reproductive health clinics and the ability of all women to obtain reproductive health care services free of harassment and fear of violence.⁹ We hope that your office will take further meaningful steps and prioritize resources to address this growing problem within New York City. Recent events, including violent attacks on

Liberties Union and Planned Parenthood of New York City and delivered to the Office of Susan Herman in 2015. A copy of the report is attached as Exhibit A. *See also* Memo to New York City Reproductive Health Facilities from New York Civil Liberties Union Reproductive Rights Project “New York City Clinic Access Law” (Feb. 28, 2011), available at <http://www.nyclu.org/files/Clinic%20Access%20Memo.pdf>.

⁶ *See* 2015 Summary of Protester Activity at Choices, compiled by NOW-NYC, as reported by the Choices Volunteer Coordinator and/or clinic escort volunteers, at page. 1. A copy of the report is attached as Exhibit B. *See also* Reproductive Health Center Access Report July 2015-November 2015, Planned Parenthood. A copy of that report is attached as Exhibit C.

⁷ *See id.*, Exhibit B.

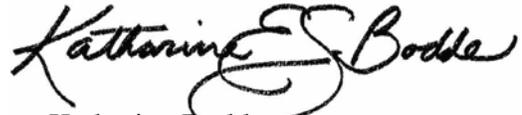
⁸ *See id.*, Exhibit B.

⁹ Letter from State of New York Office of Attorney General Eric Schneiderman to Chief Executive Officer of the Division of Social Justice, Civil Rights Bureau, (Dec. 1, 2015). A copy of the letter is attached as Exhibit D.

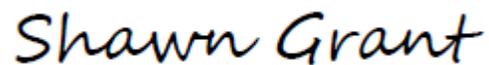
reproductive healthcare clinics around the country, further underscore the need for proactive and decisive action.

Thank you for your time and consideration. We welcome the opportunity to meet with your office to discuss this issue further.

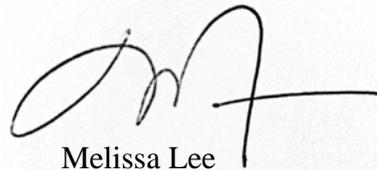
Respectfully,



Katharine Bodde
Chair, Sex and Law Committee



Shawn Grant
Member, Sex and Law Committee



Melissa Lee
Member, Sex and Law Committee

Cc: Hon. William J. Bratton, Commissioner, NYPD
Hon. Eric T. Schneiderman, New York State Attorney General
Hon. Melissa Mark-Viverito, New York City Council Speaker
Susan N. Herman, Deputy Commissioner for Collaborative Policing, NYPD

EXHIBIT A

THE STATE OF CLINIC ACCESS IN NEW YORK CITY

Choices Women's Medical Center, Inc.
Dr. Emily Woman's Health Center
NARAL Pro-Choice New York
National Organization for Women – New York City
The New York Civil Liberties Union
Planned Parenthood of New York City

Despite existing legal protections, aggressive protester activity is an ongoing challenge for reproductive health clinics in New York City. This conduct delays and disrupts access to care for patients seeking time-sensitive services including abortion, contraception, and other healthcare services. In light of these ongoing challenges and the continuing confusion regarding prohibited activity under the law, we recommend New York City strengthen enforcement of state and local legal protections for reproductive health clinics.

Background

Harassment and violence directed at reproductive health clinics' staff and patients is a reality across the country. Existing legal protections seek to balance the rights of protesters to engage in protected First Amendment speech with the ability of patients to access services.¹ In 2009, New York City sought to strengthen legal protections for New York City reproductive health clinics by enacting the Access to Reproductive Health Care Facilities Act (ARHCF). Building on state and federal law and recognizing the unique challenges experienced by New York City clinics, the ARHCF additionally prohibits following and harassing clinic patients and staff within a 15 foot zone around the facility's premises. Unfortunately, confusion regarding prohibited conduct persists and has led to inconsistent and inadequate enforcement of the law.

Protester Activity and Ongoing Challenges for NYC Reproductive Health Clinics

This past summer, Planned Parenthood of NYC, National Organization for Women – New York City, the New York Civil Liberties Union, and NARAL Pro-Choice New York convened a reproductive health provider roundtable to assess the impact of protester activity on access to reproductive health clinics across New York City. In addition to this discussion, provider surveys and data collected from clinic staff and patient escorts reveal common challenges for reproductive health clinics throughout the city.

1. Protesters are exhibiting aggressive and deceptive behavior that delays, and in some cases, prevents, patients from accessing reproductive health clinics and services.

Conduct creating an atmosphere of hostility and potentially rising to the level of prohibited behavior includes: physically blocking clinic entrances; interfering with patients who are making their way toward an entrance; making threatening and aggressive comments to patients and clinic workers; and following and intimidating patients, even after a patient indicates that they do not wish to engage with the protester. The following examples illustrate this conduct.

a. Preventing access and blocking clinic entrances: This past June, a protester attempted to physically hold a patient in place to prevent them from entering a PPNYC clinic; by the time the patient was able to enter the clinic they were visibly emotionally distressed. In another

¹For a complete description of current laws, please see attached February 28, 2011 Memo, New York Civil Liberties Union, Re: New York City Clinic Access Law.

EXHIBIT A

incident (July 26, 2014), a protester blocked a car door to prevent a patient from getting out and walking to the clinic. Similarly, on January 25, 2014, a patient attempting to access services at PPNYC felt she could not get out of her car because a protester continued to question her; she ultimately drove away. At Choices, protesters have approached cars when they stop to let patients get out; have leaned inside open car windows to thrust literature into passengers' hands, and, when patients open the car door to get out, protesters attempt to prevent them from going toward the clinic entrance.

b. Interfering with patients making their way to a clinic: Protesters outside of Choices will follow patients to the clinic entrance and attempt to step in front of the patient as they get close to the door. Protesters will crowd the entrance by standing in a group near the entrance or stationing themselves with large (5 feet tall) signs within a few feet of the clinic entrance or at regular intervals on the sidewalk leading to the clinic, forcing patients and clinic escorts to walk around them in order to enter. For example, when a patient told protesters to desist, several protesters clustered closely around her until she managed to enter the clinic. Protesters have also misdirected or confused patients about the location of clinics, providing the wrong directions or redirecting patients to a nearby crisis pregnancy center operated by anti-choice organizations. In an example from early summer 2014, a Choices counselor observed a protester stand in front of a client as the client moved toward the entrance and tell her that Choices was closed, adding "there's no doctor in there." In July, protesters falsely directed PPNYC patients to a location a block away from the clinic.

c. Creating an intimidating and hostile atmosphere for patients and staff: At Choices, patients, volunteers, and staff entering the clinic regularly report feeling intimidated, threatened, and violated by protester behavior. Protesters often shout threatening and intimidating statements at patients, and continue to do so even after being asked to stop. Some protesters follow patients down the sidewalk toward the clinic entrance while shouting at them. Other protesters station themselves near the door of the clinic and shout loudly into the clinic entrance so that patients and staff inside the clinic can hear them. Some of the statements include: "You are accomplices to murder," "Burn in hell," or asking if the individual is "proud of killing babies." Protesters yell intimidating and disturbing statements to patients who are accompanied by children as well, such as: "They're killing babies in there," or even directly at patients' children, "don't let your mother kill your baby brother/sister!" Several signs read "Babies are Murdered here," and protesters at Choices stop passers-by, point to the signs and to Choices and say "babies are being murdered right here." At Dr. Emily's, protesters have targeted Spanish speaking women by telling them that they will be deported if they have an abortion in this country. Protesters aggressively push their materials into a client's space, after explicitly being told by the patient that he or she is not interested.

Clinic escorts experience elevated forms of intimidating behavior. Protesters at Choices yell continuously at escorts as they wait to assist patients. PPNYC escorts have reported feeling unsafe when protesters get very close to them and make aggressive comments. One report noted a protester told the escort on duty he would "knock her down." At Choices, a protester physically leaned their 5 foot tall sign on the shoulder of a clinic escort standing nearby, and protesters have repeatedly attempted to bump or block clinic escorts when assisting patients walking into the clinic. On March 8, 2014, at Choices, a protester physically shoved an escort away from a client she was escorting close to the main entrance. Protesters outside of Choices have also stood near the clinic entrance and filmed patients walking in and out of the clinic. In other cases, protesters photograph clinic escorts and staff. Some of these images have been posted online. Recently, an image of a PPNYC guard standing outside of a clinic entrance was posted on social media along with a racially charged comment.

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d. Impeding clinic operations: Protesters sometimes use tactics that debilitate a clinic's daily operations. For example, ParkMed NYC in Manhattan notes that protesters have blocked the center's phone lines by making up to thirty phone calls at once, multiple times a day to prevent patients from reaching staff. This poses a risk to the women and men who may need to connect with their doctor for health questions or follow-up care. ParkMed and Dr. Emily's both reported receiving hostile phone calls. This past summer, a protester attempted to enter one of PPNYC's health centers and reach the clinical area without authorization, disrupting security operations, and making staff and patients feel uneasy. Dr. Emily's has had multiple instances of false reports made to local authorities, such as the Department of Health, which resulted in unnecessary inspections and lengthy staff interviews, large disruptions of clinic flow, costly overhead fees, and significant loss of staff time and resources diverted from patient care. On Saturdays when there are many protesters at Choices, counselors have documented that they must spend extended periods of time with patients who are upset and distraught by the protesters outside.

- 2. Protester activity is increasing in both numbers and frequency, elevating the hostile atmosphere that patients face outside of clinics.** Choices reports that 12-20 protesters regularly chant and hold large, graphic posters outside the clinic every Saturday. On occasion, there have been as many as 40. Dr. Emily's reports an average of 30 regular protesters on Saturday mornings. PPNYC has seen a noticeable increase in the number of protesters during the week in addition to the large group of weekend protesters, sometimes totaling 50-60. PPNYC has had to bring on additional staff to ensure patients feel safe and welcomed every day. More recently, PPNYC has also begun to see protesters outside the Bronx Center during the week. This site did not have regular protesters previously.
- 3. Community partners and law enforcement are not consistent in their response nor adequately informed on existing legal protections.** Some clinics have developed strong and supportive relationships with their local precincts, often resulting in proactive actions to minimize aggressive or hostile protester activities. In these circumstances, when problems with protesters do arise, the precinct responds quickly with officers who are informed about the law and prepared to de-escalate the situation – illustrating the importance of an effective response system. Unfortunately, this is not the experience for many clinics across the city. One of the most significant concerns providers have raised is the lack of adequate and appropriate response by local law enforcement offices and individuals, as well as a lack of knowledge of clinic access legal protections.

Providers report that the response and approach of officers arriving on the scene can vary widely and is sometimes counterproductive. Officers are not always knowledgeable of the legal framework, context around protester activity outside of clinics, and strategies for handling escalating situations. This inconsistency can embolden protesters to continue or heighten aggressive or threatening behaviors. At Choices, clinic escorts have been told by police officers to stay out of the way of the protesters. Dr. Emily's similarly noted that their precinct's community affairs division does not regularly return their phone calls and 911-responding officers are often not aware of New York City's clinic access law. Even at PPNYC, which typically has good responses from their local precincts, there have been instances where clinic escorts have been told on separate occasions by different officers that they both "can" and "cannot" interrupt a protester who is trying to talk to a patient. And Choices has documented at least one instance (August 2, 2014) when police were called by a clinic escort and did not respond. On another occasion (May 17, 2014) a complaint was made by the clinic escorts, and a patrol car drove by, but the officers did not get out.

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Recommendations

Based on these findings, in an effort to increase safe access to reproductive healthcare services and ensure adequate enforcement of legal protections, we recommend the following steps to standardize response systems and strengthen enforcement of the law.

1. Centralizing Reporting Methods:

Over the past several years, clinics have standardized collection of information about protester activity in feedback forms that are completed by staff and patients. To better understand the patterns of protester activity and potential legal violations, we recommend that the administration create a central point of contact for clinic staff and patients to submit protester activity reports and individual complaints. Standardized documentation provides a foundation for understanding how best to intervene and address these challenges going forward – whether that be through officer training or legal or legislative remedies.

2. Establishing Standardized Enforcement Guidelines:

Enforcement cannot be effective without a clear understanding of New York City's clinic access law and its context, as well as a standard set of response guidelines. Having clear guidelines allows for easier enforcement on the part of the NYPD and helps to improve consistency of officer response. As a method to address one of providers' major concerns around law enforcement support, we recommend the NYPD establish a consistent response plan to provide improved officer directives and efficiently and appropriately meet the needs of reproductive health clinics. We see this as inextricably linked to the importance of law enforcement trainings.

3. Requiring Law Enforcement Training:

The NYPD should require officers in precincts with reproductive health facilities to receive training regarding what the law says and best practices when responding to cases of potential protester misconduct; these trainings should be provided for new staff as well as veteran officers who are new to the issue. Our organizations are willing and able to develop and support implementation of training programs for officers in precincts with a reproductive health clinic. Advocates currently provide materials and trainings for clinic escorts, as part of increasing awareness of escort best practices and procedures.

4. Strengthening Police Response:

In precincts that have a clinic in their jurisdiction that experiences high protester activity, developing a productive and healthy relationship between precincts and clinics is imperative. We recommend a regular point of contact be established at each of these precincts so that a clinic can reach out and discuss immediate situations as well as emerging patterns. Having an established communication line will support a better understanding of the context and environment around the clinics and facilitate a more appropriate and timely response system. We further recommend regular patrolling of the clinic area during times of high protest activity.

We look forward to working with the NYPD and the de Blasio administration to increase safe access to reproductive health care facilities while ensuring that all New Yorkers have the ability to respectfully express themselves.

EXHIBIT B

2015 Summary of Protester Activity at Choicesⁱ

The increase in the number of protesters outside of Choices on Saturday mornings (from an average of 12-15 to 25-35 in some recent weeks), in concert with persistent and aggressive behavior of protesters is cause for clear concern and demonstrates an imminent need for proactive, consistent, and effective engagement of law enforcement with top clinic staff, escorts, patients, and protesters. There are numerous incidents of protesters coming into physical contact with clinic escorts, patients being “followed and harassed” within 15 feet of the clinic entrance, protesters blocking or making it unreasonably difficult for patients to enter the clinic, and protesters directing inflammatory and racially charged comments at all those on the sidewalk outside of Choices. Documented examples of these incidents include the following:

February 21, 2015 – About 15 protesters were present. “Protesters crowded a woman walking to the clinic. She was approached and surrounded. As she was walking, and trying to avoid eye contact, she walked into the wall. She started crying, dropped to the ground and our escorts helped her up and inside the building. This caused the protesters to scream wildly that we were ‘dragging a crying woman into the clinic.’”

May 30, 2015 – There were 26 protestors and 7 escorts. The report details, “At 8:50am a patient and a protestor began arguing and then some physical contact occurred - the Church at the Rock crew stopped their protestor from escalating it before we could intervene. Security footage has been pulled for documentation.”

July 18, 2015 – The clinic escorts report on this day that a patient was “scared away” by the number of people on the sidewalk.

August 22, 2015 – A protester pushed an escort to try to get to a client. Another protester put her hand on an escort’s shoulder at one point. Protesters videotaped escorts and patients on the sidewalk. Protesters use the language of “Black Lives Matter,” to make case against women of color accessing abortion.

September 5, 2015 – Using the name of the volunteer coordinator at Choices, the protesters threatened her saying, “You’re going to kick the bucket soon,” and “we’re praying for you to repent.”

September 12, 2015 – “Sharon [a regular protestor] continues to chase patients and to walk on a diagonal - trying to walk patients into the wall.” Some of the protesters incite a hostile environment by using racially charged language, including comments such as, “The people in the white coats are white - the owner of the clinic is white - and they are killing black babies,” and calling the clinic escorts, “racists.” In an attempt to persuade a patient not to enter, a protester said, “I remember you from last week ...”

September 19, 2015 – There were 35 protestors and 11 clinic escorts, with several protesters holding graphic signs 3-4 feet in height and spaced the length of the sidewalk from the corner to the clinic entrance. The high number of protesters made it unreasonably difficult to enter the clinic.

September 26, 2015 – There were 27 protesters in addition to 7 children with the protesters. One protester fully leaned into a patient’s car, through the car window. A protester pushed an escort after a patient was already inside clinic. A patient repeatedly told a protester to leave her alone, and the protester continued to follow and speak to her.

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2015 Summary of Police Interactions at Choices

March 21, 2015 – A group called “Helpers of God’s Precious Infants” (HOGPI) protested by marching from CHOICES to a nearby church. The group of about 33 protesters had a permit for the street procession, and they were escorted by the police.

April 25, 2015 – There were a total of 25 protestors over the course of the morning. A new protester arrived at 7:30 am with a milk crate and stood across from the front door. He yelled and preached very loudly and attracted the attention of two police officers across the street at a nearby deli. The police officers drove their vehicle down the street and parked behind the protester. One officer told the protester that he wasn’t allowed to stand on the milk crate or to yell that loud, because it was disturbing the peace. She emphasized that her position on the issue didn’t matter, that he had a right to protest but not to disturb the neighborhood. Another protester filmed the officer’s partner, who made similar statements.

May 2, 2015 – The police were called by the volunteer coordinator and security personnel of the clinic, because protesters were blocking the sidewalk with a large sign and the “prayer station” was making it unreasonably difficult to access the entrance. According to clinic escorts present, two officers arrived and then instructed the protesters to stop blocking the sidewalk with their signs. One of the officers told clinic escorts that he could not ask protesters to remove signs that they had affixed to a lamp post unless it was a hazard. Protesters did spread out somewhat after the police came, and some protesters departed shortly afterward.

October 24, 2015 – A police officer stopped by Choices and was engaged in a conversation with one of the clinic escorts. The clinic escort’s report about this conversation raised clear questions about the standard for harassment being set by this precinct in the context of clinic access law. Specifically, the officer noted on more than one occasion that for a clinic protester to be cited for harassment they must engage with the patient or individual they are targeting for the length of at least half of one city block. The officer also noted that the following behaviors did not constitute harassment and/or a violation of the law if they did not persist for the length of at least half of one city block: (a) protesters continuing to engage a patient after they are clearly told by that patient to stop; and (b) protesters who make physical contact with a patient or clinic escort.

NOW-NYC does not have record of any other occasions on which police were seen by clinic escorts patrolling or observing the clinic or interacting with clinic patients, escorts, or protesters.

ⁱ Compiled by NOW-NYC, as reported by the Choices Volunteer Coordinator and/or clinic escort volunteers.

PLANNED PARENTHOOD OF NYC
REPRODUCTIVE HEALTH CENTER ACCESS REPORT
JULY 2015 – NOVEMBER 2015

Planned Parenthood of NYC's reproductive health centers have experienced an uptick in protester activity over the past two years. The NYPD is a vital resource to ensure patients feel safe to access the care they need and health center staff are protected and supported to provide vital healthcare services New Yorkers depend on.

During the months of July, August, and September, Planned Parenthood of NYC (PPNYC) has seen an increase in protester activity at multiple health centers and has had a significant increase in staff calls made to 911. The past four months have seen an overall uptick in both numbers of daily protesters as well as unexpected large protests. PPNYC staff and escorts have encountered numerous cases of protesters repeatedly physically obstructing health center doors, being verbally aggressive to staff and patients when asked to move away from the doors, approaching individuals inside of their cars, and following patients up to the health center's doors. PPNYC has also experienced several large-scale protests during the summer, as well as one protest held late at night. Protesters have regularly displayed large and inflammatory signs that patients walk past to enter the health center.

The Protester Activity Report below highlights notable changes in protest behavior over the past several months and some inconsistencies in NYPD response to heightened protest activity.

Protester Activity Report

EXHIBIT C

Incident	Date, Location	Concern	NYPD Response
A protester stationed himself in close proximity to the Bronx health center and refused to move. His shouts to patients were so loud and his positioning was so close to the door that he could be heard inside the lobby of the building.	11/07/2015 (Saturday) Bronx Center	Protesting our Bronx center is a new tactic that unsettled our staff.	NYPD was called to the Bronx health center. Police officers arrived and advised the protester that as long as he did not attempt to enter the building or block the door that he could continue to protest.
Eight protesters held a late night vigil in front of the health center at approximately 1:00am.	9/20/2015 (Monday) Margaret Sanger Center	Late night protests are a new tactic for our centers and at a time when there is no security on duty.	NYPD was not informed, as staff did not know there was a protest taking place late at night. A construction crew across the street photographed the event and shared it with our security team the following day.
A scheduled protest in front of our Staten Island center drew new protesters that took up the entire block, holding several graphic signs.	9/17/2015 (Thursday) Staten Island Center	Protesting our Staten Island center is a new tactic that unsettled our staff and required additional security.	Precinct officers were informed of the scheduled protest and patrolled the area during the time. Officers did not seem to be fully knowledgeable of the NYC law and what was prohibited behavior within the 15-foot zone.
A protester stationed himself within three feet of the center entrance, interfering with patients entering the health center and refusing to move when staff requested.	9/12/2015 (Saturday) Margaret Sanger Center	NYPD response was inconsistent with past responses & precinct support.	NYPD was called when the protester would not move. A new precinct officer arrived and said the protester was allowed to stand in front of the entrance. The officer then left the scene and told security staff to call the precinct detective, to resolve the situation.
A scheduled protest drew over 200 anti-abortion activists; the largest demonstration we've had across from of our center in years.	8/22/2015 (Saturday) Margaret Sanger Center	Exceptionally large protest - although well managed by NYPD.	PPNYC alerted NYPD that a large protest was planned as part of a nationwide action. NYPD was responsive, and provided great support. Officers blocked off the street with metal barrier fences and patrolled the area during the day. While very loud and potentially disturbing to our patients, the protest was well contained.
Several protesters stationed in front of the center yelled & held large inflammatory signs that blocked the street. This led patients to jaywalk to avoid the barricade and signs. Protesters targeted & followed patients to the door and made insulting personal comments. Staff reported feeling very uncomfortable. The group's yelling could be heard from the top floor of PPNYC's center, which led nearby residents to place complaint calls.	8/6/2015 (Thursday) Margaret Sanger Center	NYPD response was inconsistent and officers took much longer to arrive than expected.	PPNYC placed four calls to 911 after multiple loud and upsetting interactions between protesters and patients. However, officers did not arrive until an hour after the first call was made. Once present, the police response was supportive and officers understood the law. After the officers left, a protester and patient got into a loud disagreement. 911 was called again; this time officers did not show up at all.

EXHIBIT C



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Planned Parenthood of New York City

<p>A protester physically obstructed the door every time a patient walked toward it. When staff asked her to move, she became verbally aggressive.</p>	<p>7/25/2015 Margaret Sanger Center</p>	<p>Protesters have increasingly physically obstructed PPNYC's entrance & threatened staff and patients.</p>	<p>NYPD response was efficient and supportive: PPNYC called 911 and the Community Affairs Detective came right away. The Detective stayed until a sector car arrived.</p>
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EXHIBIT F



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

ERIC T. SCHNEIDERMAN
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
CIVIL RIGHTS BUREAU

December 1, 2015

Dear Chief Executive Officer:

The New York State Office of the Attorney General is committed to protecting the civil rights of New Yorkers and ensuring compliance with those laws that guarantee full and safe access to reproductive health care services. In light of the recent events at a Planned Parenthood clinic in Colorado Springs, I am writing to underscore our continued commitment to enforcement of those federal, state and local laws that ensure patient and staff access to facilities that provide reproductive health services across New York State.

As a result of violence and threats of violence at reproductive health facilities around the nation, federal and state laws prohibit activity that constitutes an act of force, a threat of force, or an act of physical obstruction. My office is committed to upholding these laws to ensure that all New Yorkers have continuous access to a full range of health care services. My office has taken action to protect reproductive rights in several areas. Most recently, my office secured a modified court order protecting a Planned Parenthood site in Utica in response to threatening and obstructive action by protesters.

We stand ready to take action necessary to ensure that New York State residents have full and safe access to necessary reproductive health care services. If you become aware of potential violations of the state's clinic protection laws or if you believe that clinic staff, patients, or other persons are victims of unlawful harassment at reproductive health clinics in New York State, please contact your local law enforcement agency and contact the Civil Rights Bureau of my office to make a complaint. To make a report, please call us at (212) 416-8250 or send an email to Civil.Rights@ag.ny.gov.

I thank you for your ongoing efforts to provide important health services for the women of the State of New York.

Sincerely,

Eric T. Schneiderman