# Pro Life Legal Defense Fund Newsletter

Winter 2014

Pro Life Legal Defense Fund, Inc., 1150 Walnut Street, Newton, MA 02461 | www.plldf.org | info@plldf.org

## MESSAGE FROM THE PRESIDENT

I hope you will be pleased with the rich content of this Winter 2014 PLLDF Newsletter, and with the devoted efforts of PLLDF's volunteer attorneys.

In addition to the phenomenal results of our attorneys before the Supreme Court of the United States in the *McCullen* and *Hobby Lobby* cases, PLLDF has been active putting life issues front and center in other courts, agencies, and the public square. Whether litigating to protect patients' rights, exposing the dangerous inadequacies in Massachusetts' abortion consent forms, or advocating before the legislature and other audiences, our approach has always been the same: professional, respectful, intelligent, compassionate and determined.

Through loving and intelligent advocacy involving all ages, from law students to veteran attorneys, we continue efforts to inspire confidence in publicly expressing pro-life beliefs.

PLLDF's continued influence depends upon your ongoing support. Let me humbly request, on behalf of all those at the margins of life, that you support us morally and materially to the full extent of your ability.

Thank you for your steadfast support,

Robert W. Joyce, President

P.S. *All contributions to PLLDF are tax deductible.*

## SAVE THE DATE – 2015 CENTURY DINNER

PLLDF is delighted to announce that Michael J. DePrimo, Esq. will receive the 2015 Thomas More Award at the 2015 Century Dinner, which will be held at the Boston Marriott Newton on Saturday, April 25, 2015. Attorney DePrimo was trial counsel in the *McCullen* case, and has successfully litigated pro life cases throughout the nation.

**Inside This Issue:**



## PLLDF 2014 CENTURY DINNER

St. Thomas More Award recipient and lead counsel in *McCullen v. Coakley*, Mark Rienzi, Esq. with petitioners Eleanor McCullen and Rev. Eric Cadin, at PLLDF's 2013 Century Dinner.

Attorney Mark Rienzi received the Thomas More Award at PLLDF's 2014 Century Dinner. An enthusiastic crowd witnessed Attorney Rienzi's enlightening presentation regarding *McCullen v. Coakley* and other major pro life cases. Attorney Rienzi stated that "[PLLDF] is an organization that, for me, played a big role in getting me started doing pro life litigation." He acknowledged that he began litigating pro life cases "because [PLLDF] was here." He expressed special gratitude for Professors Dwight Duncan and Mary Ann Glendon's tutelage.

## *McCULLEN v. COAKLEY* & ITS AFTERMATH

By Michael J. DePrimo, Esq.

In June of this year, the United States Supreme Court struck down a Massachusetts statute that created "speech-free" zones on public streets and sidewalks within 35 feet of abortion clinic entrances, exits, and driveways. The Supreme Court's unanimous decision in *McCullen v. Coakley*, 134 S. Ct. 2518, 189 L. Ed. 2d 502 (2014) was the culmination of a seven-year legal battle between prolife advocates in Boston, Springfield, and Worcester, and the Massachusetts Attorney General's Office. And though the plaintiffs lost *four* times in the federal courts—twice in the trial court and twice in the Court of Appeals—before being vindicated by the highest court in the land, they refused to give into what they knew was a serious infringement of their First Amendment rights. Such is the perseverance of prolife advocates both in the courtroom and out on the streets.

The Supreme Court's *McCullen* decision was a blockbuster in several ways. First, it was a unanimous decision that captured even the Court's four liberal members. Indeed, Justice Ruth Bader Ginsburg, the Court's most liberal member and champion of women's and abortion rights, described the State's case as "pitiful."[1] Second, Eleanor McCullen was described in major media as "the new face" of the prolife movement.[2] This new face—grandmotherly, warm, inviting, friendly, and helpful—is an astonishing turnabout from previous characterizations of prolife advocates who were, for decades, portrayed as violent, screaming, and intolerant women-haters. Third, the High Court concluded that sidewalk counselors are not protestors but rather seek "to inform women of various alternatives and to provide help in pursuing them." *McCullen*, 134 S. Ct. at 2536. Fourth and most importantly, the Court held that listener's reactions to speech cannot be a proper basis for governmental restrictions on speech. *Id*. at 2532. *McCullen* therefore effectively overruled *Hill v. Colorado*, which held that "[t]he unwilling listener's interest in avoiding unwanted communication" was a sufficient basis for restrictions on speech. 530 U.S. 703, 716-717 (2000). The recognition by the Court that unwelcome speech cannot justify restriction in the use of public streets and sidewalks is a huge victory for free speech.

Of course, our vigilance must not end with the victory in *McCullen*. Only days after *McCullen* was decided, Governor Deval Patrick and Attorney General Martha Coakley went back to the legislature urging the adoption of new legislation. That legislation, passed on July 30, 2014, purports to empower police with the ability to order a person to stay at least 25 feet away from the entrances, exits, and driveways of an abortion clinic if such person is found to have "substantially impeded access to or departure from" the abortion clinic. Mass. Gen. Laws, ch. 266, §§ 120E1/2(b). While peaceful prolife advocates view this new law as a paper tiger, we must nevertheless be on guard for unlawful applications. To date, there have been no reports of the law having been applied anywhere in Massachusetts.

*Eleanor McCullen and Attorney Phil Moran are all smiles in the sunshine outside the U.S. Supreme Court following oral arguments.*

Finally, *McCullen* has had a domino effect across the country. The cities of Portland, Maine; Burlington, Vermont; and Madison, Wisconsin have repealed their buffer laws, and a constitutional challenge to the buffer law in Pittsburgh, Pennsylvania has been filed. In addition, it is likely that challenges to buffer laws in San Francisco and Chicago will be filed shortly. In sum, *McCullen* is likely to have far-reaching effects across the entire United States.

[Michael J. DePrimo, Esq. was a counsel of record in the McCullen case.]

*We got tickets! PLLDF board members and Lex Vitae students assembled outside the U.S. Supreme Court at 6:00 AM, and were among approximately 150 who gained public admittance to witness the McCullen v. Coakley oral arguments. [left to right: Bob Joyce, Esq., Hanford Chiu, Thomas Patrick & Bridget Fay, Esq.]*

[1] http://bigstory.ap.org/article/ginsburg-court-right-void-clinic-buffer-zones

[2] http://bigstory.ap.org/article/high-court-case-abortion-clinic-protest-free-zone-0

## HOBBY LOBBY ADANCES PRO LIFE CAUSE AND RELIGIOUS FREEDOM

By Thomas Y. Patrick and Dwight G. Duncan

On June 30th, 2014, the Supreme Court of the United States handed down a ground-breaking decision in *Burwell v. Hobby Lobby Stores, Inc.* In a 5-4 decision, the majority, led by Justice Samuel Alito, held that Hobby Lobby and similar entities had the right under the federal Religious Freedom Restoration Act to refuse providing abortifacient contraceptives because such techniques of birth control violated their Christian beliefs. The decision was a significant victory for the pro-life cause, and guarantees that closely-held corporations can exercise religious freedom.

The case all began when the Green family, owners of Hobby Lobby, and several other corporations were informed that they would have to violate their religious beliefs by providing birth control that could cause abortion to their employees at no cost. As the case worked its way to the Supreme Court, *Hobby Lobby* attracted national attention, restarted the conversation around religious freedom, and galvanized the pro-life movement. The Pro-Life Legal Defense Fund, as well as Massachusetts Citizens for Life, Massachusetts Family Institute, and the National Lawyers Association, all non-profit corporations, expressed interest in filing an amicus brief in support of Hobby Lobby, a closely-held, family run business for profit. Dwight Duncan, assisted by a number of law students from his own law school, as well as Boston College Law School, including yours truly, wrote an amicus brief supporting Hobby Lobby.

The amicus brief focused on the established history of religious freedom in the United States of America's colonial years and the Anglo-American legal tradition. Specifically, the brief argued that there are many examples where secular legal institutions, including the corporate form, were employed to accomplish religious purposes, especially those of religious minorities. The team's brief demonstrated the culture of freedom inaugurated by the Pilgrims at Plymouth Rock, and continued by Roger Williams in Rhode Island, William Penn in Pennsylvania, and by Catholic colonists in Maryland.

The amicus brief arguably made a difference. One portion of the brief described the writings of William Blackstone, who distinguished between secular and religious corporations around the time of the American Revolution. Interestingly, the excerpt of Blackstone's Commentaries mentioned in the amicus brief were used by both the majority and the dissent in their opinions in the case. Consequently, the dedicated efforts of PLLDF members and students indirectly contributed to a landmark judicial decision that has opened the doors of religious freedoms for corporations, and secured a great victory for the pro-life cause.

[Thomas Y. Patrick is a 2L at Boston College Law School. Dwight G. Duncan, Esq. is a Faculty Member at the University of Massachusetts School of Law.]

*PLLDF board member Dwight Duncan, Esq. helped explain the Hobby Lobby decision to many audiences.*

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## PLLDF – INTERNATIONAL IMPACT

PLLDF was privileged to have an international law student pro bono intern for a brief period during 2014. He came from a country where, he stated, "most people have never heard about the concept of pro-life." Acknowledging that he had known "nothing about pro-life," he had concerns about the impact which protection of the unborn might have on uncontrolled population growth in his country.

At the end of his internship, this student wrote to PLLDF and stated that, as a result of his new experience, he "realized that pro-life is much more than just a preference." Rather, he stated that "pro-life is an observation and conception of life based on legal, scientific and logical justifications." For the first time in his life, he considered that the "complete and unique DNA of a being… begins at the moment of conception."

This former intern expressed that "Now, pro-life to me is a method to think about life with justifications," and that "I need to use sound justifications to support my argument and make myself wise and reasonable." He described this as "the golden part" of what he had learned from his PLLDF pro bono work, and that he was very appreciative.

It's nice to know that, as a result of PLLDF's efforts, there is a new pro-life voice in another country. We progress one person at a time!

## FIGHT FOR YOUR LIFE – MGH

By Robert W. Joyce, Esq.

So you want to fight for your life, do you? Well, at Massachusetts General Hospital (MGH) maybe you'll be allowed to do so – or maybe you won't!

Once again, PLLDF attorneys were called upon to protect a vulnerable patient from a MGH's policy. This time, I and Attorney Tom Harvey obtained a restraining order which prevented MGH from (1) unilaterally imposing a do not resuscitate (DNR) order, and (2) limiting life-sustaining treatments, against the will of the patient and his health care agent. MGH's actions were the result of recommendations made by its Orwellian-titled "Optimum Care Committee" (OCC).

Barry Tevrow was admitted to the MGH cardiac intensive care unit on May 16, 2014, having been transferred from a hospital where he had been intubated after suffering a heart attack at home. As a 66 year-old former football coach for Swampscott High School (for approximately 20 years) and the semi-pro North Shore Generals, Barry had repeatedly stressed the importance of fighting, even against great odds. Now he was in a fight for his life!

Barry's desires were simple. All he wanted was to interact with his wife of 39 years and their 8 children, to watch football on TV, and to pet his dogs – all of which he was still able to do. And that's what his family wanted for him.

MGH had other ideas. Through a combination of imprecise evaluations, cavalier communications, and failure to follow established rules, MGH tried to shortcut Barry's fight for life.

First, a MGH doctor wrongfully assessed that Barry did not want intubation. Barry's wife, who was also his health care agent, insisted on an immediate psychiatric evaluation to determine Barry's wishes. Within hours, an MGH psychiatrist evaluated Barry and concluded that he understood both his condition and the risks and benefits of treatment and non-treatment. Barry was deemed able to make a decision. He chose intubation and maximum medical treatment.

On another occasion, a MGH psychiatrist disagreed with the opinion of a senior medical resident who had opined that Barry was mentally clear and that he consented to the withholding of life-sustaining treatment. Notwithstanding that resident's opinion, the MGH psychiatrist concluded that Barry had delirium and lacked the capacity to assent to withdrawal of care.

In addition to arguing that it is only the court, not the OCC, which is authorized to make a final decision in this type of case, PLLDF contended that it should be determined whether MGH had any monetary incentive to impose a DNR and/or limit life-sustaining care. Despite numerous requests whether MGH had received any notice that payments for Barry's medical care either had been or might be suspended by an insurer or payor, MGH failed to respond. Accordingly, it appears that Barry's rights under the patients' rights statute were not honored by MGH.

Barry's case represents an ominous situation. According to a study referenced by The American Thoracic Society International Conference in May, 2014, MGH has had a unilateral DNR policy in place since 2006. Since then, there have been at least 147 cases of conflict reported over the intensity of treatment and DNR status. Shockingly, it reported that 41% of those cases had been for other than "endstage" situations (i.e. for cases deemed "potentially reversible").

PLLDF would like to help ensure that other families do not experience what Barry and his family had to endure. We invite any attorney who would like to help in this type of case to contact us as soon as possible.

Barry passed away, on his own terms, on September 12, 2014.

[Robert W. Joyce, Esq. is the President of PLLDF.]

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## SEEKING PRO BONO VOLUNTEERS

*Boston College Law School Lex Vitae members Larissa Warren and Hanford Chiu assisted board member Bob Joyce, Esq. at the Boston Bar Association/Suffolk University Law School Pro Bono Fair. Thirteen law students and young attorneys signed up to receive additional information about PLLDF.*

## FOR THE UNBORN CHILD UNDER MASSACHUSETTS LAW, STRANGERS MAY BE DANGEROUS. BUT MOTHERS CAN BE ABSOLUTELY FATAL

By Frank L. McNamara, Esq.

During his long and distinguished career, the Hon. John T. Noonan, Jr. (a displaced Bostonian) single-handedly elevated the metaphysics of everything he touched, whether at the University of California, Berkeley, where he taught (law), or on the Ninth Circuit Court of Appeals, where he later sat. Once asked about the abortion debate, he offered the following succinct formulation: "Abortion represents the collective failure of society to extend to a particular portion of humanity the compassion and protections that are its due and that it willingly extends to others."

This signal failure to extend protections to a vulnerable form of humanity confounds the deepest yearnings of the human heart. Not surprisingly, psychiatrists and anthropologists inform us that it can also produce neuroses in the individual.

And it introduces dissonance and incongruity to the social fabric. Nowhere are these presented in starker relief than in the current schizophrenic state of the law regarding the personhood of the fetus, a condition rendered particularly glaring by the progressive revelations of pre-natal science.

Consider this: under certain conditions that a compliant physician might easily and synthetically construct, the law of the Commonwealth extends no protections whatsoever to the personhood of the fetus, allowing instead the mother or her surrogate(s) to end the life of her unborn viable child late into the third trimester. Yet coexisting with this reality are other areas of the law where that same unborn child is afforded all the status and protections available to any other human person.

For example, the Commonwealth's wrongful death statute (M.G.L. c. 229, §2) allows recovery against one who, "by his negligence causes the *death of a person* . . . under such circumstances that the deceased could have recovered damages for personal injuries if his death had not resulted . . . ." [Emphasis supplied]. While the SJC has thus far declined to extend the rights and remedies enshrined in this statute to a stillborn that was not viable at the time of injury[1], the Court has (even following *Roe*) steadily expanded the notion of personhood thereunder. Currently a cause of action for the wrongful death of a child will lie (i) in cases where the child is born alive, regardless of viability[2], as well as (ii) in cases where the fetus is viable at the time of injury, even if not born alive.[3]

The criminal law of the Commonwealth has also seen a gradual expansion of the notion of personhood with respect to the viable unborn. Thus if a third party causes the death of a viable fetus, he can be convicted of involuntary manslaughter under G.L. c. 265, §13[4], and the conviction does not require proof that the defendant was aware either of the existence or the viability of the fetus.[5] The notion of personhood has also been extended to include a viable fetus under the motor vehicle homicide statute.[6]

In short, with respect to the protections to which Judge Noonan alluded, Massachusetts law is a congeries of imprecision and inconsistency, of the kind that sad lives, glad lies, and loose thought uniquely impart.

[Frank L. McNamara, Jr., Esq. is the former United States Attorney for the District of Massachusetts.]

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## CULTIVATING THE NEXT GENERATION OF PRO LIFE LAWYERS AT BOSTON COLLEGE LAW SCHOOL

Last year, Boston College Law School (BCLS), under the inspired leadership of BCLS 3L Hanford Chiu, saw a revival of interest in the pro life movement through the reconstitution of Lex Vitae, a student organization dedicated to pro life advocacy in the form of pro bono work. Since then, Lex Vitae has provided pro life enrichment to BCLS' student body and contributed numerous hours of pro bono service to defending those at the margins of life.

Lex Vitae was able to hold successful attorney speaker events, with Pro Life Legal Defense Fund (PLLDF) board members Phil Moran and Fran Fox sharing their

[1] *Thibert v. Milka*, 419 Mass 693 (1995).

[2] *Torigian v. Watertown News Co.*, 352 Mass. 446 , 448 (1967) (wrongful death personhood expanded to include fetus not viable at the time of the injury but born alive).

[3] *Mone v. Greyhound Lines, Inc.*, 368 Mass. 354, 361 (1975) (reversing *Leccese v. McDonough*, 361 Mass. 64, 67 (1972); see also *Keyes v. Construction Serv., Inc.*, 340 Mass. 633, 637 (1960) (wrongful death personhood extended to fetus viable at time of injury *and* born alive).

[4] *Commonwealth v. Pugh*, 462 Mass. 482 (2012).

[5] *Commonwealth v. Crawford*, 430 Mass. 683 (2000).

[6] G. L. c. 90, §24G. *Remy v. MacDonald*, 440 Mass. 675 (2004); *Commonwealth v. Cass*, 392 Mass. 799 (1984) (infliction of prenatal injuries resulting in death of a viable fetus constitutes homicide whether before or following birth).

experiences in pro life litigation with the student body. Through PLLDF's support, Lex Vitae members travelled to Washington D.C. and attended the oral arguments for the unanimously decided *McCullen v. Coakley* case at the Supreme Court of the United States. Lex Vitae members also helped prepare an amicus brief for the *Hobby Lobby* case, and participated in networking events with PLLDF board members and other pro life attorneys. Several Lex Vitae members were privileged to serve as PLLDF interns and collectively perform hundreds of hours of pro bono and other legal work in the defense of life.

This year, Lex Vitae intends to solicit a panel of attorneys to share their pro life experiences with the student body, continue to provide important pro bono work to further life, and advocate the pro life position to the student body. This growing student organization looks forward to coordinating positive involvement of the broad pro life legal community and continuing to sow seeds which can help reap a bountiful harvest of future pro life attorneys.

*BCLS Lex Vitae President Hanford Chiu & PLLDF President Bob Joyce, Esq.*

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## MARY ROQUE, ESQ. – ADVOCACY IN PRACTICE: A PRO LIFE PRACTITIONER HIGHLIGHT

By Larissa Warren

As a second-year law student grounded in pro life beliefs in a predominantly pro abortion culture, it was a special honor to have the opportunity to interview Mary Roque recently about being a pro life attorney in Massachusetts. Mary's life and law practice provide a powerful illustration of how an attorney can achieve personal and professional success while advocating for pro life values.

Working as a solo practitioner, Mary respectfully discusses her faith and issues concerning life with her clients. Primarily practicing elder law, end of life decisions are often on the horizon for her clients. Mary approaches these opportunities with a caring and individualized approach. She notes that you simply "…have to have a conversation with people."

Mary had many of those conversations building up to the Massachusetts vote on the physician-assisted suicide referendum in 2012. The so called "Death with Dignity" bill would have allowed physicians to prescribe lethal drugs to terminally ill patients. During this time, Mary was a volunteer with the Council on Aging. "I was very vocal to everyone," she said about her opposition to the proposed legislation. Whether speaking with an elderly client, a fellow citizen or a legislator, Mary compassionately explained how someone could take advantage of an elderly person in that situation. She spoke steadily and gracefully about the dignity in life, instead of a supposed dignity in death.

As we spoke about the pro life cause in general, Mary commented that there is "a lot of work to be done still on showing people the value of life." She offered helpful advice for her pro life colleagues, suggesting that one way to promote meaningful conversations is to "talk about the beauty of life."

Communicating the beauty of life can be done indirectly or directly. As Mary's personal experience illustrates (she is one of six children), families can indirectly highlight the beauty of life through the joy of children. When directly addressing pro life issues in conversations, Mary commented that it is good to remember that people generally have good hearts. She cautioned that "we never know what someone else has been through," so we must approach people with sensitivity and compassion.

Mary would like to see increasing numbers of young people involved in the future of the pro life movement. She believes that they have a powerful opportunity to get the pro life message out in a new and meaningful way. She adds that support from pro life colleagues can be received by attending conferences like those hosted by Alliance Defending Freedom, involvement with groups like Women Speak for Themselves, participation in a local church, or from other resources such as PLLDF.

Mary commented that attorneys and students should interact and share values with people of all backgrounds and opinions, without abandoning the pro life cause. Finally, she encouraged pro life advocates to continue to "instill confidence in the pro life movement."

[Larissa Warren is a 2L at Boston College Law School]

## AMERICAN UNIVERSITY WOMEN FOR LIFE – PROTECTING WOMEN'S HEALTH & PARENTS' INTERESTS

By Robert W. Joyce, Esq.

Alarmed by disclosures revealed in PLLDF's Winter 2013 Newsletter, and after speaking with PLLDF representatives, the American University Women for Life (AUWL) decided to pick up the gauntlet and try to (1) address perceived inadequacies in Mary Moe procedures in Massachusetts Superior Courts, and (2) remedy harmful deficiencies in Massachusetts abortion informed consent forms.

AUWL includes professional women, across a broad spectrum of ages and occupations, who reach out to women experiencing unplanned pregnancies, providing them, and parents and counselors, with valuable resources and information. As nurses, teachers, healthcare administrators, counselors, social workers, financial services providers, mothers and grandmothers, AUWL members combine professionalism with resolve, all in pursuit of respect for women's health.

With PLLDF's assistance, AUWL has established contact with the Office of the Chief Justice of the Superior Court, the Executive Office of Health and Human Services (EOHHS), and the Massachusetts Department of Public Health (MDPH).

Mary Moe procedures enable Superior Court judges to allow unemancipated minors to obtain abortions without parental consent. For over two decades, judicial authorization for such abortions has reportedly been granted in over 99.9% of the 16,000 Mary Moe petitions presented. A Massachusetts Supreme Judicial Court case reported that, "[t]he record shows that judicial authorization [in Mary Moe cases] is nearly a certainty."

AUWL challenges whether Superior Court judges are properly assuring that minors are adequately informed of the physical and psychological health risks associated with abortion. AUWL is concerned that our courts might be directing inquiry away from factors which are relevant for the well-being of minors and the interests of loving parents.

With respect to abortion consent forms, AUWL is shocked to witness that despite MDPH's statutory duty to provide forms "written in a manner designed to permit a person unfamiliar with medical terminology to understand its purpose and content," and the statutory definition of abortion as "the knowing destruction of the life of an unborn child," the current forms inadequately refer to the statutory "unborn child" as "the contents of the womb." Additionally alarming to AUWL is the fact that the consent forms fail to advise that the abortion can result in mental health problems.

AUWL notes that Massachusetts statutes provide more protection for consumers of "products" than MDPH does for consumers of abortion services. It is considered an unfair and deceptive practice under Massachusetts consumer protection laws to fail to disclose "any fact, the disclosure of which may have influenced the buyer or prospective buyer not to enter into the transaction." AUWL acknowledges that abortion services are not products under the law, but it sees no reason why EOHHS and MDPH should not provide comparable disclosures to protect vulnerable consumers of abortion services.

Mary Elizabeth DeWinter, President of AUWL, states "our members are committed to engaging in a productive dialogue with the Chief Justice of the Superior Court, EOHHS, and MDPH with the goal of identifying accurate information and fair language for protection of women's health and respect for parental rights."

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## PLLDF BOARD MEMBERS HONORED BY MCFL

*PLLDF board members Fran Fox, Esq. (center) and Phil Moran, Esq. (right) were Keynote Speakers at the Massachusetts Citizens for Life's 41st Annual Assembly for Life at Faneuil Hall. [board member, Tom Harvey, Esq. is pictured with them on left]*

# ACHIEVEMENTS & OBJECTIVES
# 2014 & 2015

PLLDF board members gathered recently at Phil & Carol Moran's house to celebrate our 2014 accomplishments and discuss goals for 2015.

*Board members enjoy wearing PLLDF's new t-shirts, with "Advocating for Life www.plldf.org" clearly displayed on the back, on a beautiful day at former President Phil Moran's house. [left to right: Roy Scarpato, M.S., Bridget Fay, Esq., Jack Foley, Esq., Colbe Mazzarella, Esq., Bob Joyce, Esq., Tom Harvey, Esq, & Phil Moran, Esq..]*

To our loyal supporters, we thank you for fighting for life with us in 2014. We hope that this newsletter invigorates your ongoing involvement and inspires other to join in PLLDF's efforts during 2015.

## WE NEED YOUR SUPPORT!

Please consider making a financial contribution today. Your generosity will allow PLLDF to provide trained and committed pro life voices in our courtrooms and other public forums. Please help us continue our life-saving work.

**All contributions to the Pro Life Legal Defense Fund are tax deductible.**

Please make checks payable to "PLLDF" and mail to:

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