September 1st, 2025

National Abortion Federation Attn: Brittany Fonteno PO Box 100 Annapolis Junction, MD 20701 Email: naf@prochoice.org

Re: Washington Surgi Clinic/Dr. Cesare Santangelo 2112 F. St. NW Suite 400 Washington DC 20037

Dear Ms. Fonteno,

This letter is being sent to formally put the National Abortion Federation (NAF) on notice, and to inform you of important developments regarding a clinic your organization refers to, specifically, the Washington Surgi-Clinic. Below we have detailed the National Abortion Federation's commitment to standard of safety and care as well as the possible dangerous conditions that may be occurring at the Washington Surgi-Clinic.

1. THE NATIONAL ABORTION FEDERATION MAKES PROMISES OF QUALITY CARE

According to your organization's website, the following claims have been noted:

Mission Statement: "The mission of the National Abortion Federation is to unite, represent, serve, and support abortion providers in delivering <u>patient-centered</u>, <u>evidence-based care,"</u>

The NAF's Core Values Include:

"Integrity-honest open living of organizational values, showing decency and striving to do the right thing, Respect-Actively listening and engaging with one another with understanding and empathy reflecting our consideration for others,"

Also, your organization provides provider security which claims:

"NAF provides numerous resources to abortion providers and facilities in order to **keep** staff and **their patients safe**, including staff preparedness trainings, facility and residential security assessments, and law enforcement assistance. NAF can also refer your facility to a variety of reputable companies that provide security-related services,"

The NAF continues to state that it is Helping Patients and claims:
"In addition to being the professional association of abortion providers, <u>NAF also</u>
provides direct service to patients who need help accessing abortion care. We run

a toll-free, multi-lingual Hotline for <u>abortion referrals</u> and financial assistance in the U.S. and Canada. We provide callers with <u>accurate information</u>, confidential consultation, options counseling, and <u>referrals to providers of quality abortion care</u>. We also provide case management services and limited financial assistance to help people afford the cost of their care and travel-related expenses. The Hotline is free and offers services to everyone, regardless of their individual situation,"

"How safe is an abortion?

According to the best medical evidence available, abortion is safer than getting a dental procedure or cosmetic surgery [6], and much safer than childbirth. According to that evidence, in the United States, a woman is about 15 to 25 times more likely to die in childbirth than she is during an abortion [7-10]."

"Who provides abortion care?

In some states and provinces, <u>advanced practice clinicians</u> like midwives, nurse practitioners and physician assistants can provide medication abortion. With a few exceptions including Vermont, California, and Montana, uterine aspiration is limited to physicians only. However, in studies of abortion safety, abortion—either medication abortion or uterine aspiration—is as safe and effective when it is provided by a trained clinician as when it is provided by a doctor [14]."

"<u>To find a provider</u> in the United States, Mexico, Canada or Colombia, please <u>visit our</u> <u>Find a Provider page."</u>

2. DUTY OF CARE OF REFERRING AGENCIES AND PHYSCIANS.

It is clear that a referring agency to a healthcare provider has a duty of care to patients when choosing a physician or health care provider. A negligent referral occurs when a doctor's failure to make a timely, appropriate referral to a specialist or a poorly chosen specialist, leads to harm or injury to the patient. This harm or injury could include a doctor's misdiagnosis, underestimation of the seriousness of a condition, lack of knowledge, or failure to research a specialists qualifications. It can also occur when a physician or referring agency knew or should have known the specialist was incompetent, unqualified, or unable to provide adequate care yet referred the patient anyway. To prove a claim, a patient must show the referring physician or referring agency's lack of due diligence or knowledge of the referred physician's ability to provide proper care. This can also form a basis of punitive or exemplary damages.

3. FACTS REGARDING THE WASHINGTON SURGI CLINIC WHICH REQUIRE NAF'S DUE DILIGENCE.

On August 18th, 2025, a14-page complaint and documented concerns was formally submitted to the Board of Medicine in Washington, DC regarding the Washington Surgi-Clinic and the clinic's current medical doctor, Dr. Cesare Santangelo. This complaint

included 24 exhibits, many being direct evidence to the risk, danger, and liability Dr. Santangelo brings to patients by continuing to operate and practice. To summarize, it is known that Dr. Santangelo has neuropathy, wears a full arm cast on his right arm, has been observed to be disoriented at times, is unsteady on his feet, requires a personal caregiver for basic functioning such as walking, standing, and driving, and monitoring his falls and injuries. The DC Board of Medicine (along with other entities) were also put on notice through the filing of these concerns and formal complaint and it was requested that they:

- 1) take immediate action by (at minimum) suspending the license of Dr. Santangelo and that of Washington Surgi Clinic, and
- 2) investigate this matter thoroughly to include but not limited to the suspected Unlicensed activity occurring at Washington Surgi Clinic and the physical and cognitive abilities of Dr. Santangelo. (A copy of this complaint is attached for your review).

Should anyone be referred to receive or obtain funding to receive the subpar care available at Washington Surgi-Clinic from this point forward after being formally put on notice, it would constitute a negligent referral, as referring physicians and agencies have been put on notice of possible subpar care occurring at the clinic. The NAF has a duty to their clients to investigate and determine if Washington Surgi Clinic is following Standards of Care regarding late term induction abortions, umbilical cord transections (UCT's), and dilation and evacuation (D&E) procedures for late term abortions. In addition, NAF has a duty to their clients to ensure Dr. Ceasare Santangelo is competent and physically able to perform surgeries prior to referring any patient to Washington Surgi Clinic. Failure to perform such due diligence and a detailed investigation will not only expose the National Abortion Federation to a lawsuit for negligent referral but may also form the basis of a large punitive damage award in the future. After receiving this letter, the National Abortion Federation will be unable to deny the possible inherently dangerous conditions that exist at the Washington Surgi Clinic. As the safety of women is at risk, your prompt attention is required to investigate this matter fully and completely prior to referring any patients to this facility.

Respectfully,

Timothy Clement (805) 535-0687

The Survivor's Director

Kristin Turner (530) 440-2977 The Survivor's DC Organizer