September 1st, 2025

DC Abortion Fund PO Box 65061 Washington DC 20035

Email: info@DCAbortionFund.org

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

Dear Board Members and staff of the DC Abortion Fund,

This letter is being sent to formally put the DC Abortion Fund (DCAF) on notice, and to inform you of important developments regarding a clinic and provider your organization is referring people to.

# 1. THE DC ABORTION FUND PROMISES THE MOST TALENTED HEALTHCARE PROFESSIONALS IN THE COUNTRY AND WELL-TRAINED CASE MANAGERS

According to your organization's website, the following claims were noted: "DCAF pays it forward by **funding abortion seekers** all over the country—including locations with fewer financial resources or where access is threatened. We fund national and international callers as long as an appointment is made with **one of our area clinics**. As a current haven for abortion access, DC is currently only one of three places in the entire United States where an individual can get a third-trimester abortion. Unfortunately, many people exhaust their funds through travel and hotel expenses, leaving nothing left to dedicate toward their procedure. We're here to close the financial gap for all callers traveling to the region

### Step 1

DCAF only offers financial assistance to those living in DC or traveling to the area—specifically, at the clinics listed below. Please make your appointment at one of the following clinics prior to requesting DCAF funding.

- DC clinics
- Dupont Clinic
- Washington Hospital Center
- Planned Parenthood Carol Whitehill Moses Center
- Washington Surgi Clinic

#### Step 2

At DCAF, our case managers are **well-trained** and passionate about offering financial assistance to those who need it.

That said, we ask that you call Planned Parenthood (if you made your appointment at Planned Parenthood) or the National Abortion Federation Hotline (for all other appointments).

Why? Both organizations offer financial assistance for callers across the country. If eligible, they will lower your costs.

After that, give us a call and **we will help close your remaining financial gap** Step three

Now, give us a call or fill out our online form.

After making your appointment and contacting a national organization, you're ready to get in touch with DCAF. **We provide financial assistance** with zero eligibility requirements, meaning we welcome those at any income level, at any gestational age, experiencing any life circumstance.

STEP four

We pay the clinic directly.

All funds pledged by DCAF are **sent directly to the clinic where you made your appointment.** We do not send funds to callers."

It has also been noted by your website that the DC Abortion Fund has made the following claim:

"Exceptional care.

DC clinics staff some of the **most talented healthcare professionals in the country**. DCAF partners with multiple clinics in the DC region, many offering third-trimester procedures."

#### 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 THE DCAF'S DUE DILIGENCE.

On August 18<sup>th</sup>, 2025, a 14-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 and dazed, 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 the 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 DCAF 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, the DCAF 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 DCAF 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 DCAF 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