

September 1st, 2025

The Lilith Fund
PO Box 684949
Austin, TX 78768
Email: info@lilithfund.org

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

Dear Neesha Dave and The Lilith Fund Board of Directors,

This letter is being sent to formally put the Lilith Fund on notice, and to inform you of important developments regarding a clinic and provider you may be providing funds to and/or referring people to.

1. THE LILITH FUND PROMISES TRUSTED CLINICS.

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

*"Lilith Fund can **fund abortions** in states where it is legal. We also offer direct financial assistance for non-abortion reproductive healthcare with our **trusted partner clinics**, including ultrasounds, screenings, contraceptives, counseling, trans care, and more. We are assisting Texans who are traveling out of state for care, along with Texans seeking care within our service areas (Austin, Houston, and San Antonio). We continue to offer information about pregnancy options, resources, and referrals for all Texans who call us.*

Depending on where your appointment is, you can also text the following keywords to our hotline at 877-659-4304 anytime. Staff can respond Monday through Thursday from 9 AM to 5 PM Central.

- CALIFORNIA
- COLORADO
- ILLINOIS
- KANSAS
- MARYLAND
- NEVADA
- NEW MEXICO
- NEW YORK
- TEXAS
- VIRGINIA
- **WASHINGTON DC**

*Collaboration: It is a privilege to do this work, and **we acknowledge the power we hold.** In our partnerships, we embrace the responsibility to operate with transparency, prioritize intentional communication, and practice **accountability** and equity in our work.”*

2. DUTY OF CARE OF REFERRING AGENCIES AND PHYSICIANS.

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 specialist's 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 LILITH FUND'S DUE DILIGENCE.

On August 18th, 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 Lilith Fund 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 Lilith Fund 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 Lilith Fund 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 Lilith Fund 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,

X 

Timothy Clement (805) 535-0687
The Survivor's Director

X 

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