September 1st, 2025

National Network of Abortion Funds 9450 SW Gemini Dr. PMB 16009 Beaverton, OR 97008

Email: media@abortionfunds.org

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

Dear National Network of Abortion Funds Board of Directors,

This letter is being sent to formally put the National Network of Abortion Funds (NNAF) on notice, and to inform you of important developments regarding a clinic and referrals and abortion funds being used by abortion funding sources. Your agency is referring individuals to these abortion funding sources.

1.THE NATIONAL NETWORK OF ABORTION FUNDS PROMISES TRUSTWORTHY CLINICS.

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

"Abortion funds **provide the financial** and logistical support you need **to get the abortion** you want. Use this resource page to connect with abortion funds, find **trustworthy** clinics, understand Medicaid abortion coverage, and more.

Additional Resources:

Abortion Access

Do you want to understand a confusing abortion term or learn more about **finding a trustworthy clinic?** Maybe you'd like tips on contacting an abortion fund or securing extra financial assistance. Read these additional resources for more information about those topics and more.

Find an Abortion Clinic You Can Trust

Every abortion clinic is different. Use these resources to search for a safe clinic and read our advice for finding a good provider.

Find a Clinic You Can Trust

Abortion funds have decades of experience.

The abortion access landscape is difficult and constantly changing. But abortion funds have decades of experience ensuring people can get the abortion they want and need. These years of experience mean abortion funds are adept at navigating abortion barriers and providing a safety net of care for abortion seekers.

It also means that funds are **skilled** at bringing compassion to their work and building power in their **fight** for Reproductive **Justice**."

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 NNAF'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 NNAF 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 NNAF 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 NNAF 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 NNAF 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