



**Via US Mail**

March 20, 2025

Attorney General Gentner Drummond  
Office of Attorney General  
313 NE 21st St  
Oklahoma City, OK 73105

**Re: Potentially Deceptive Privacy Practices of Crisis Pregnancy Centers**

Dear Attorney General Drummond,

The Electronic Frontier Foundation (“EFF”) is a member-supported, non-profit civil liberties organization that has worked to protect free speech and privacy rights in the online world for more than thirty years. With more than 30,000 active donors and dues-paying members nationwide, EFF represents the interests of technology users in courts, legislatures, and broader policy debates regarding law, technology, and civil liberties.

We write to draw your attention to potential violations of the privacy and consumer rights of people in your state who have provided sensitive health data to crisis pregnancy centers (“CPCs”). CPCs are facilities that offer pregnancy tests, counseling, and information, as well as limited medical services in some cases, but not reproductive healthcare such as abortion or contraception. Some are licensed medical clinics; many are not. Nationally, there are an estimated 2,750 of these facilities and the vast majority are affiliated with one or more of three national organizations: Care Net, Heartbeat International, and the National Institute of Family and Life Advocates. CPCs reportedly received \$1.4 billion in revenue in 2022, including substantial federal and state funds.<sup>1</sup>

As you may be aware, last year researchers at the Campaign for Accountability filed a series of complaints asking Attorneys General in five states—Idaho, Minnesota, Washington, Pennsylvania, and New Jersey—to investigate crisis pregnancy centers in those states that had allegedly misrepresented, through their client intake process and/or via their websites, that information provided to them was protected by the Health Insurance Portability and Accountability Act (“HIPAA”).<sup>2</sup>

An incident in Louisiana also suggests that some CPCs may be sharing client information with other centers in their affiliated networks, without appropriate privacy or anonymity protections.<sup>3</sup> In that incident, a software training video shared the names and personal information of roughly a dozen patients.

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<sup>1</sup> See <https://www.theguardian.com/world/2024/feb/14/anti-abortion-centers-funding>

<sup>2</sup> See <https://campaignforaccountability.org/watchdog-asks-state-attorneys-general-to-investigate-crisis-pregnancy-centers-for-deceptive-practices/>

<sup>3</sup> See <https://campaignforaccountability.org/watchdog-asks-louisiana-ag-to-investigate-deceptive-pregnancy-center-following-leak-and-hhs-determination/>

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As advocates for consumer privacy, we are concerned that CPCs in your state may be engaged in similar practices. For example, Journey Women's Center (<https://journeywomenscenter.org/>) claims on its "Medical Services" page, "*We understand the importance of privacy, which is why we strictly adhere to HIPAA regulations to ensure the confidentiality of your personal information.*" See Exhibit 1.

As another example, Charis Center (<https://chariscenter.org/>) directs clients: "*To see the HIPAA Notice of Privacy Practices, go to the footer of the website homepage*", but there is no linked form in the website footer. See Exhibit 2.

And **Life Choices Chickasha** (<https://lifechoiceschickasha.com/>) claims, on its "What To Expect During Your First Appointment" page, that "*We follow HIPAA regulations so everything is always confidential.*" See Exhibit 3.

EFF is concerned that people in your state may rely on these representations when they share personal information with these centers and others with similar practices. Please note that some CPCs have changed the language on their sites in the past few months, apparently in response to public complaints and media coverage. However, they may still be referring to HIPAA when they meet with clients.

Accordingly, we respectfully urge your office to investigate whether CPCs in Oklahoma are violating privacy and consumer protection laws by deceiving clients as to how their private information will be retained and used. If you have any questions, please do not hesitate to contact me.

Sincerely,



Corynne McSherry  
Legal Director  
Electronic Frontier Foundation

## Exhibit 1 – Journey Women’s Center

### Journey Women’s Center “Medical Services”

<https://web.archive.org/web/20250305210408/https://journeywomenscenter.org/medical-services/>. captured on March 5, 2025

The screenshot shows the top portion of a website. At the top, there is a light blue navigation bar with a phone icon and the number 580.234.5660, and a clock icon with the text "Mon - Thurs. 10am - 4pm". Below this is the Journey Women's Center logo in red and black. To the right of the logo are four menu items: "PREGNANCY", "SUPPORT", "BE INFORMED", and "CONTACT", each with a small downward arrow. Below the navigation bar is a large light blue section with the heading "Medical Services" in a large, dark teal font. Underneath the heading, in a smaller, dark teal font, is the text "ALL MEDICAL SERVICES ARE CONFIDENTIAL AND FREE OF CHARGE".

#### Free professional medical services

Journey Women's Center is a non-profit clinic that is dedicated to providing compassionate care, medical services, and support.

##### Walk-ins are always welcome.

Schedule an appointment to reduce wait time. **Appointments are required to receive pre-abortion screening. JWC does not provide confirmation of abortion.**

[SCHEDULE YOUR FREE APPOINTMENT](#)

#### Your privacy is important

Our team consists of **experienced medical professionals** who are committed to your well-being. We understand the importance of privacy, which is why **we strictly adhere to HIPAA regulations** to ensure the confidentiality of your personal information. **Your privacy is of utmost importance to us, and we take every measure to safeguard it throughout your journey with us.**

Rest assured that when you choose Journey Women's Center, **you can trust that your privacy and confidentiality will be respected and protected at all times.**

## Exhibit 2 – Charis Center

### Charis Center Terms of Use and Privacy Policy

<https://web.archive.org/web/20250305210935/https://chariscenter.org/terms-of-use-and-privacy-policy/>, captured on March 5, 2025

🔒 <https://chariscenter.org/terms-of-use-and-privacy-policy/>



#### Contact Us

If you have any questions about this document, please contact us at 580-786-6000.

To see the HIPAA Notice of Privacy Practices, go to the footer of the website homepage.

## Exhibit 3 – Life Choices Chickasha

### Life Choices Chickasha “What To Expect During Your First Appointment”

<https://web.archive.org/web/20250305212952/https://lifechoiceschickasha.com/what-to-expect>, captured on March 5, 2025

The screenshot shows a web browser window with the URL <https://lifechoiceschickasha.com/what-to-expect>. The page header includes the Life Choices Chickasha logo (a house with a heart) and the text "LIFECHOICES CHICKASHA". Navigation links for "Home", "FAQs", "Services", and "Resources" are present, along with a prominent "Book Appointment" button. The main content area is divided into two columns. The left column features the heading "GETTING STARTED" in red, followed by the main title "What To Expect During Your First Appointment" in large, bold, dark blue text. Below the title, a paragraph states: "For your first appointment, please bring a photo ID (if available). A support person is welcome for ultrasounds, but not required." A "Book Appointment" button is located below this text. The right column is titled "A FEW THINGS TO KNOW:" and contains a bulleted list of five items: "All services are free and we won't notify your insurance of your care.", "We follow HIPAA regulations so everything is always confidential.", "A licensed medical provider will provide your care, but you will have access to trained staff for questions and counseling.", "We provide a safe, non-judgmental environment for you to process your pregnancy options and answer your questions.", and "Expect your first appointment to take 1-2 hours, depending on the service."

Text | (405) 645-6062 Call | (405) 222-5483

Home FAQs Services Resources **Book Appointment**

**GETTING STARTED**

# What To Expect During Your First Appointment

For your first appointment, please bring a photo ID (if available). A support person is welcome for ultrasounds, but not required.

**Book Appointment**

**A FEW THINGS TO KNOW:**

- All services are free and we won't notify your insurance of your care.
- We follow HIPAA regulations so everything is always confidential.
- A licensed medical provider will provide your care, but you will have access to trained staff for questions and counseling.
- We provide a safe, non-judgmental environment for you to process your pregnancy options and answer your questions.
- Expect your first appointment to take 1-2 hours, depending on the service.