

## Complaint Narrative – Complaint against Mandy Lynn Gittler

On September 3, 2014, Mandy Lynn Gittler submitted an application for a medical license to the Medical Licensing Board of Indiana. [\(Exhibit 1\)](#)

On November 7, 2014, the Medical Licensing Board of Indiana issued Gittler License Number 01074721A, which expires on October 31, 2015. [\(Exhibit 2\)](#)

On Page 5, Question 8 of her application for licensure, [\(Exhibit 1, Page 5\)](#), Gittler marked the box indicating a “no” answer to the following question: “Have you ever had a malpractice judgment against you or settled any malpractice action?”

However, that answer does not reflect a malpractice case involving a patient death for which her employer paid out a settlement of \$2 million.

On January 3, 2013, a malpractice suit was filed in the Circuit Court of Cook County, Illinois by Alvin Jones, Jr., as Administrator of the estate of Tonya Reaves, deceased, and as Guardian to the estate of Alvin Jones, III. It is Case Number 2013L000076. [\(Exhibit 3\)](#) This suit will be referred to hereafter as “*Jones v. Planned Parenthood.*”

Gittler is listed as a defendant in that case, along with her employer, Planned Parenthood of Illinois.

Filed with the *Jones v. Planned Parenthood* complaint documents, a redacted medical opinion dated September 28, 2012, can be found. [\(Exhibit 3, Page 18\)](#) That letter is purportedly written by a physician who is board certified in Obstetrics/Gynecology who is familiar with abortion procedures.

The letter notes that Mandy Gittler performed a dilation and evacuation abortion on Tonya Reaves on July 20, 2012, at a Planned Parenthood of Illinois office without the use of ultrasound guidance. After the procedure, Reaves experienced excessive bleeding and another dilation and evacuation procedure was performed by Gittler. The reviewing physician stated that Gittler “did not timely recognize that the patient needed to be transferred to a hospital for care and treatment, which resulted in a delay in her receiving care and treatment that she needed.” Reaves died as a result.

The letter further notes that each procedure done by Gittler and her delay in sending her patient to the hospital each represented deviations in the standard of care and concludes that if the deviations had not occurred, Reaves would have survived.

Gittler submitted to a sworn deposition in *Jones v Planned Parenthood* on August 22, 2013, wherein she admits having conducted two dilation and evacuation abortion procedures on Reaves on July 20, 2012, at a Planned Parenthood of Illinois office. [\(Exhibit 4\)](#) She further admits to a timeline that showed Reaves was not transported to a hospital for 5 ½ hours after Reaves’ first procedure and the onset of excessive bleeding.

On January 24, 2014 – eight months before Gittler applied for licensing in Indiana – an Order for Approval of Wrongful Death Settlement was approved by Judge John P. Callahan, Jr. and filed in the Circuit Court of Cook County. [\(Exhibit 5\)](#) In this settlement, Gittler’s employer, Planned Parenthood of Illinois, agreed to settle *Jones v. Planned Parenthood* and agreed to pay out the significant amount of \$2 million.

