

# EXHIBIT C

**BEFORE THE  
ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI**

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REPRODUCTIVE HEALTH SERVICES OF  
PLANNED PARENTHOOD OF THE ST. LOUIS  
REGION  
4251 Forest Park Avenue  
St. Louis, MO 63018 (314/531-7526)

Petitioner,

v.

MISSOURI DEPARTMENT OF HEALTH AND  
SENIOR SERVICES  
Randall W. Williams, M.D., Director  
912 Wildwood, P.O. Box 570  
Jefferson City, MO 65102 (573/751-6400),

Respondent.

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AHC No. \_\_\_\_\_

**DECLARATION OF CATHY WILLIAMS IN SUPPORT OF  
PETITIONER'S MOTION FOR STAY**

My name is Cathy Williams and I do declare the following under penalty of perjury:

1. I am the Interim President and CEO of Petitioner Reproductive Health Services of Planned Parenthood St. Louis Region ("RHS").
2. RHS is a non-profit health care provider, providing comprehensive reproductive and sexual health care and education.
3. RHS has provided high-quality, patient-centered, and non-judgmental reproductive health care services, including abortions, in St. Louis for over twenty years, during which time it has been continually licensed as required by applicable law.

4. RHS's core mission is to provide comprehensive reproductive health care and education, particularly to underserved individuals, including patients with low incomes.

5. Providing high-quality, safe, and legal abortion care to patients in need is a core part of this mission, as it is a core part of comprehensive reproductive health care and helps RHS's patients plan their families and protect their health and well-being.

6. RHS is the only generally available abortion provider in the State of Missouri.

7. If RHS's Motion for Stay is not granted, the people of Missouri will have *nowhere* in the state where they can turn to access their constitutional right to an abortion.

8. If RHS's Motion for Stay is not granted, RHS will have to turn away patients seeking an abortion—including those patients who have already received state-mandated information at least 72 hours prior to their appointment to obtain an abortion, as mandated by Missouri law—which unquestionably harms those patients.

9. Indeed, many of RHS's patients are low-income and do not have the means—and often cannot rearrange work or childcare to make the time—to travel out of state to obtain abortion services elsewhere.

10. Since DHSS started holding up RHS's license renewal application, patients have been calling the center regularly, often in tears, terrified that they will no longer be able to obtain abortion care.

11. If RHS's Motion for Stay is not granted, RHS will be unable to fulfill a core component of its mission to provide its patients with comprehensive, high-quality, safe, non-judgmental, and patient-centered reproductive health care.

12. RHS provides care through highly trained and qualified physicians who have dedicated their careers to providing comprehensive reproductive health care, including abortion care, because they believe in making the full range of reproductive health care available to all their patients.

13. If RHS's Motion for Stay is not granted, these physicians will not be able to continue providing the high quality care at RHS to which they have dedicated their lives.

14. RHS and the Washington University School of Medicine in St. Louis participate in training programs in abortion and family planning. Obstetrics/Gynecology physician residents at Barnes Jewish Hospital who participate in a residency program accredited by the American Council for Graduate Medical Education ("ACGME") have the option to integrate family planning and abortion training into their overall Obstetrics/Gynecology residency training. The ACGME requires training or access to training in the provision of abortions. As part of this requirement, each obstetrics/gynecology resident has the option to participate in two rotations at RHS throughout their four-year residency so that they may obtain training in providing high-quality family planning care, including abortion care.

15. If RHS's Motion for Stay is not granted, these residents will not be able to train at RHS. And because RHS is the only abortion provider in the state, and residents need a state-specific license to be able to provide care, this is a grave threat to their ability to fulfill a core component of their accredited training and residency program.

16. RHS and the Washington University School of Medicine in St. Louis also host a Fellowship in Family Planning, which is a two-year post-graduate training program focused on advanced abortion and contraceptive care as well as research training. During the two years of

their fellowship, Family Planning Fellows obtain high-quality training and provide high-quality supervised medical care at RHS as well as the Washington University School of Medicine in St. Louis.

17. The Family Planning Fellowship is a highly competitive nationwide program, and fellows selected to work with RHS and the Washington University School of Medicine in St. Louis move to St. Louis from around the country to participate.

18. Without a stay of Respondent's license renewal denial, these fellows will not be able to continue the requirements of their fellowship at RHS and will not receive the high-quality training that was promised to them and, as a result, will be irreparably harmed. Moreover, RHS is the only abortion facility in Missouri that they can complete this training, and because participation in this training requires a state-specific medical license, these fellows will at minimum be delayed in their ability to continue their fellowship elsewhere, if they are able to do so at all. the high-quality training that was promised to them and, as a result, will be irreparably harmed.

19. For all these reasons, I believe that if a stay of Respondent's decision to deny RHS its license renewal, RHS, its staff, its patients, and its contracted physicians will all be irreparably harmed.

Dated: June 21, 2019

By: Cathy Williams  
Cathy Williams



*Kristina Winkelman*

KRISTINA WINKELMAN

MY COMMISSION EXPIRES 12/5/2022

Interim President & CEO  
Reproductive Health Services of  
Planned Parenthood of the St. Louis  
Region