

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

Comprehensive Health of Planned
Parenthood Great Plains, et al.

Plaintiffs,

v.

Joshua D. Hawley, in his official
capacity as Attorney General of
Missouri, et al.

Defendants.

Case No. 2:16-cv-04313-BCW

Declaration of William Koebel

1. My name is William Koebel. I am the Section Administrator for the Section for Health Standards and Licensure within the Division of Regulation and Licensure of the Missouri Department of Health and Senior Services (Department), which is responsible for inspecting and licensing abortion facilities in Missouri. In my role I, oversee the inspection and licensing of abortion facilities and assist in performing inspections. I attended the inspections of the Columbia Planned Parenthood (711 N. Providence Road, Columbia, Missouri) (Facility) on August 14, 2018 and September 26, 2018.
2. The Department uses a standard process for scheduling inspections, notifying facilities of deficiencies found during inspections, and confirming that the deficiencies have been corrected. After an inspection, the Department issues a written Statement of Deficiencies to the facility. The facility then develops and provides to the Department a written Plan of Correction. The Department reviews the Plan of Correction, and if it is acceptable, the

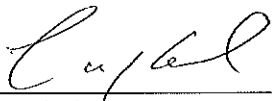
Department may perform an unannounced follow-up inspection to confirm that all deficiencies have been corrected as identified in the Plan of Correction.

3. In this instance, the Department performed the inspections of the Facility in accordance with its standard process. The Department began the inspection process for licensure renewal of the Facility in sufficient time for the Facility to achieve compliance with all licensure requirements before licensure expiration. When I and the Department's inspectors entered the Columbia facility for the follow-up inspection on September 26, 2018, I fully expected that all deficiencies identified in the August 14, 2018, Statement of Deficiencies would have been corrected, particularly given that the license expires October 2, 2018. Instead, I and the inspectors found that some of those items still had not been corrected. Specifically, during the August 14, 2018, inspection, multiple observations of infection risks, in violation of 19 CSR 30-30.060(1)(B)(6) were found and documented on the Statement of Deficiencies provided to the facility. This finding included areas of rust on the metal suction machine cabinet in the procedure room. The facility alleged compliance with this deficiency no later than September 25, 2018. Upon arrival at the revisit on September 26, 2018, the rusted areas of the procedure room cabinet had not been addressed as alleged and was found to be uncorrected. In addition, connected to the procedure room suction machine, there was a series hose with what appeared to be mold on the inside. The facility manager confirmed the substance was mold during an interview conducted in my presence. Another hose connected to the procedure room suction machine appeared to contain body fluid. Again, the facility manager confirmed the substance was most likely body fluid in an interview conducted in my presence.

4. Not only had all deficiencies not been corrected as of the September 26, 2018, follow-up inspection, but there was a new deficiency that would have to be corrected (and observed via another revisit) before a license could be issued to the Facility. A new deficiency was found related to the facility's use of non-healthcare heating pads in the recovery room, in violation of 19 CSR 30-30.060(2)(K).
5. It is not part of the standard licensure renewal inspection process for facilities to file affidavits in federal court rather than affording the Department the opportunity to review the facilities' plan of correction and revisit the facility to confirm that the deficiencies have been corrected.
6. I and the Department stand by the September 28, 2018, Statement of Deficiencies as written.
7. Attached hereto as Exhibit A are eight (8) true and correct copies of photos taken by me during the September 26, 2018, inspection of the Facility.

I declare under penalty of perjury that the foregoing is true and correct.

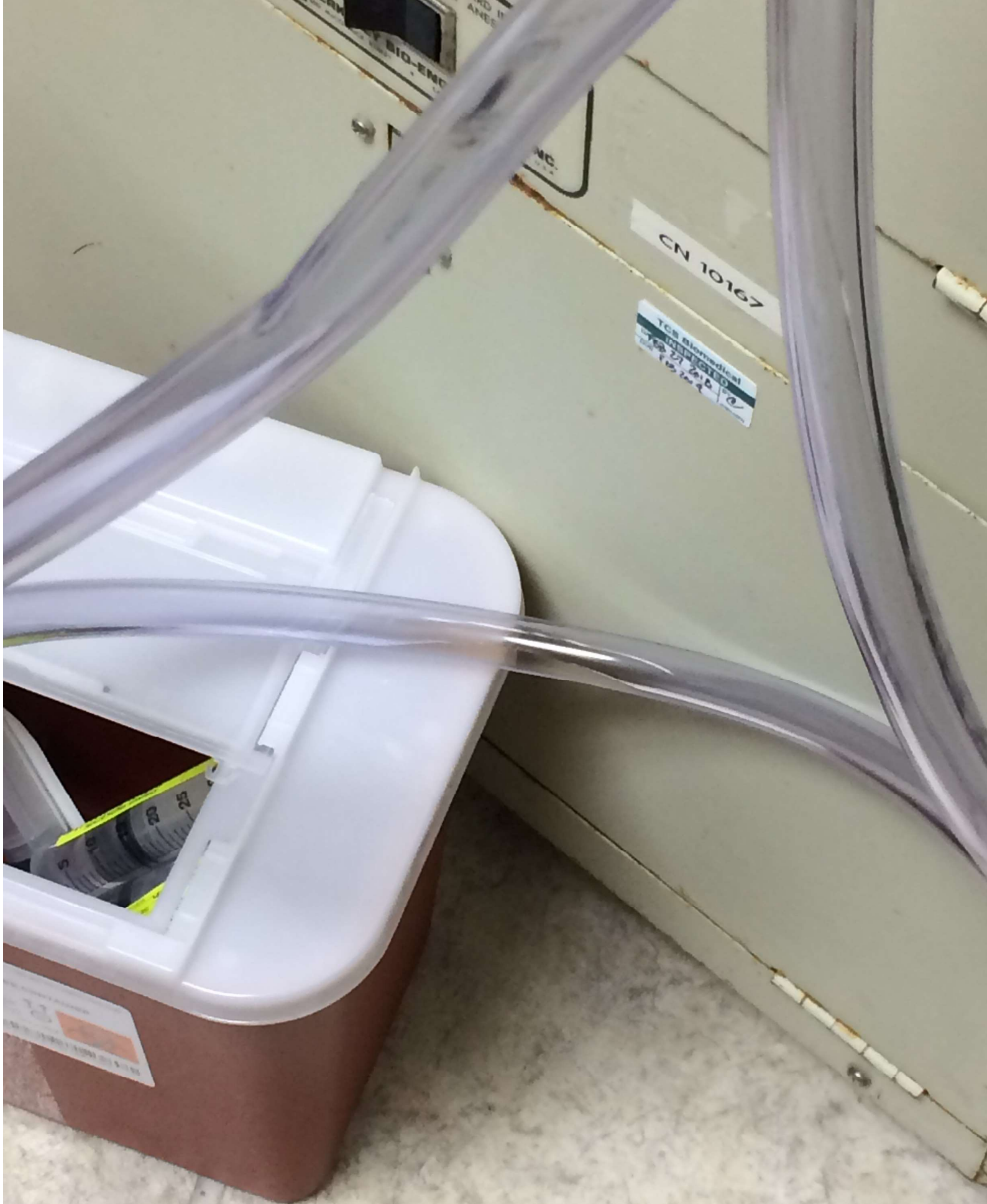
Dated: 9-30-18



William Koebel
Section Administrator
Section for Health Standards and Licensure
Missouri Department of Health and Senior Services

EXHIBIT A



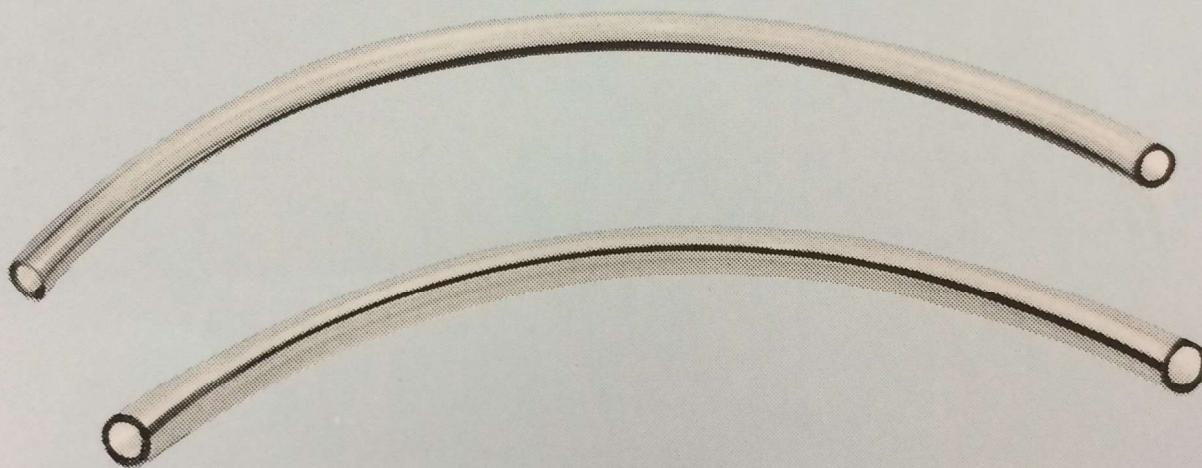








SERIES CONNECTING HOSES



CONDUCTIVE
RUBBER O-RING
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FEMALE HOSE FITTING 21219B

MALE HOSE FITTING
21218B

GAUZE SACKS

ORDER NO.
10143

Replacement parts

ORDER NO.
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21651 Slip rin
21650 Handle
21653 Metal
21654 Metal

FEMALE HOSE
(with O-RING)
MALE HOSE F

ORDER NO.
21218B
21219B
20270

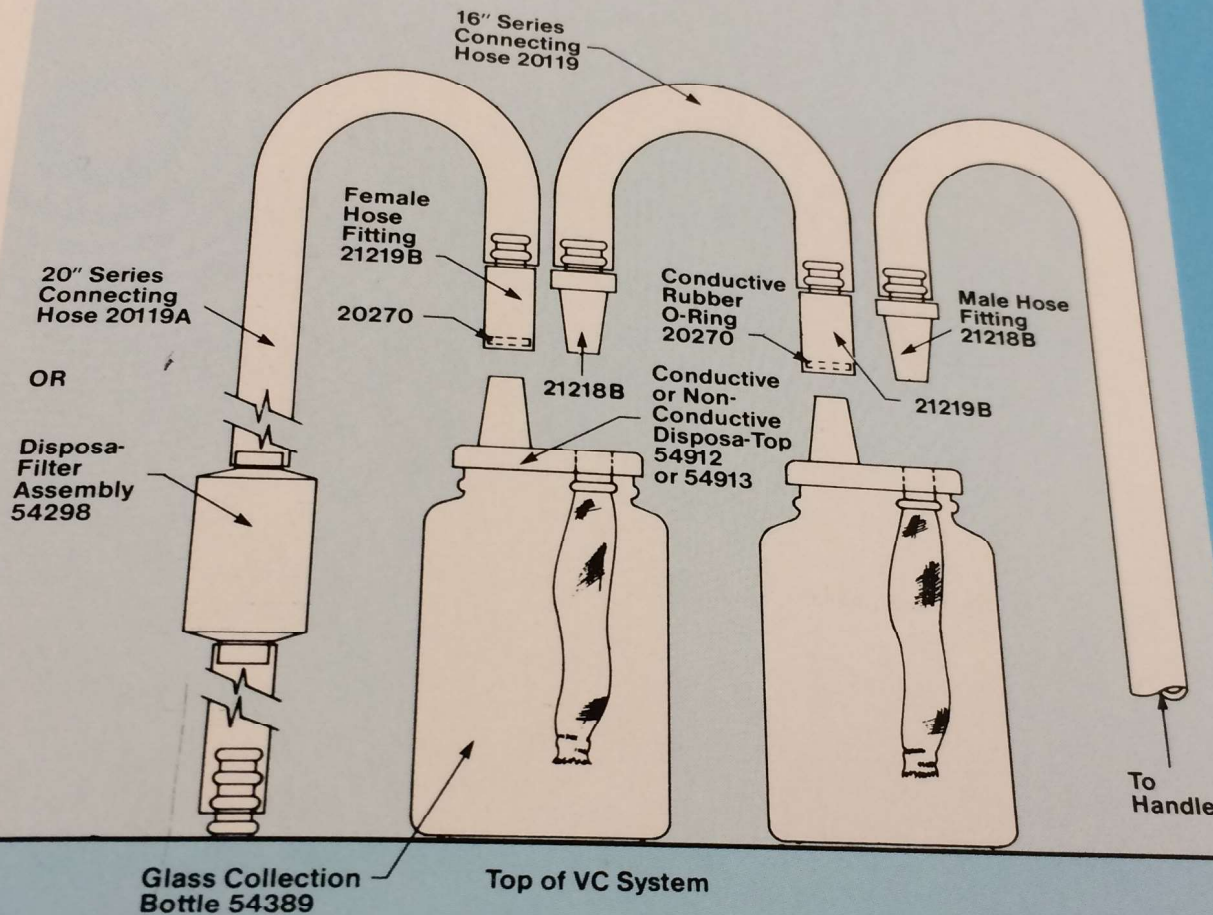
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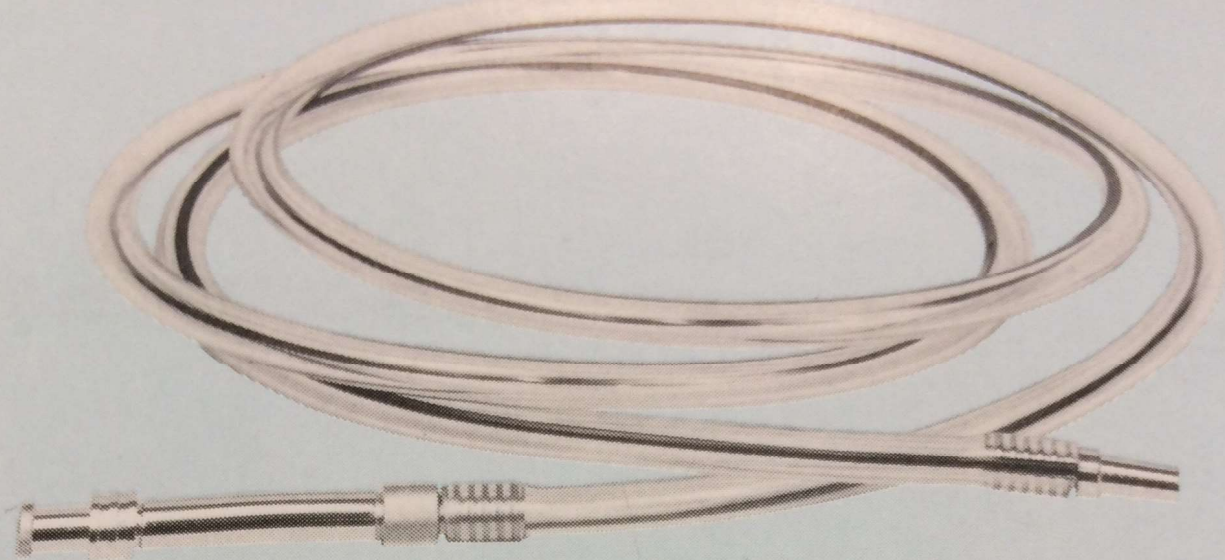
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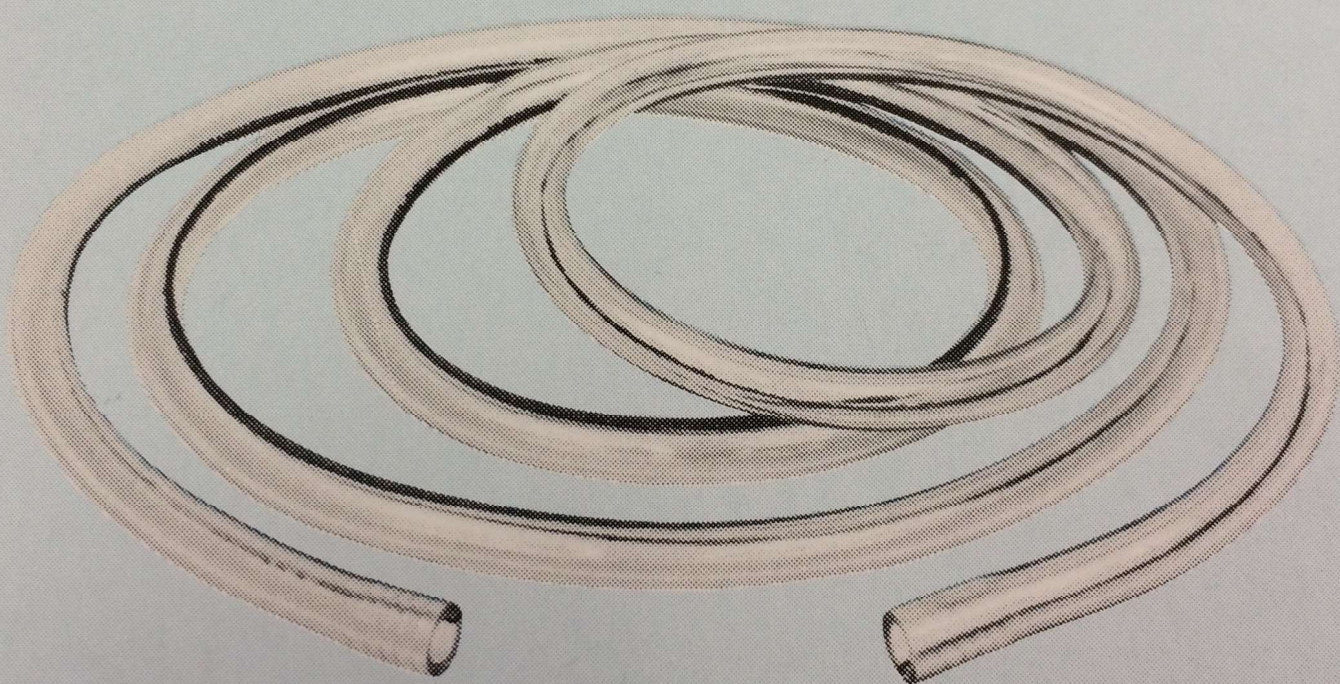
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CONDUCTIVE HOSE



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