

# Pro Life Legal Defense Fund Newsletter



Winter 2015

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## PLLDF CONTEMPORARY LEGAL LIFE ISSUES SEMINAR

PLLDF supporters enjoyed an extra benefit at the 2015 Century Dinner. The Contemporary Legal Life Issues Seminar preceded the event and provided attendees with critical current pro-life information.

Professor Dwight Duncan explained to seminar guests that the Massachusetts Supreme Judicial Court (SJC) has created special state rights for abortion, beyond those under the U.S. Constitution. One such created right requires public funding of abortion in cases where the state funds other pregnancy-related medical expenses. Another right eliminated the need for both parents' consent before an abortion, replacing it with consent of just one parent while retaining a judicial bypass option without any parental consent.

Attorney Michael DePrimo educated attendees about First Amendment requirements for speech in different types of forums (public, limited public, non-public). Integrating critical aspects of the successful challenge in *McCullen v. Coakley* at the Supreme Court (which protected free speech rights of pro-life counselors at abortion clinics), he explained the constitutional principles of content and viewpoint neutrality and the requirement of narrow tailoring with respect to the government's interest.

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Attorney Patricia Stewart expertly raised concerns with respect to the life-threatening risks inherent in Medical Order for Life Sustaining Treatment (MOLST) forms. MOLST is a nationwide initiative, by which seriously ill patients can document their preferences for end of life care. It was expanded statewide in Massachusetts in 2012. Attorney Stewart cautioned that most people could easily get “caught up in the MOLST net,” which creates unacceptable risks of misuse and would hasten the death of persons deemed, by proponents of the culture of death, to be unworthy or too costly to treat. She advised the audience how to identify the anti-life bias in these deceptively simple forms, and to protect an unsuspecting public.

State Rep. Jim Lyons outlined pro-life and pro-family initiatives in the Massachusetts legislature and emphasized the importance of reliable pro-life educational materials. He thanked the pro-life attorney community for providing him with helpful resources as he continues to advocate for life on Beacon Hill.

[[The seminar can be viewed on our website at www.plldf.org](http://www.plldf.org). DVDs are also available on request.]



## MESSAGE FROM THE PRESIDENT

Robert W. Joyce, Esq.

This 2015 Newsletter describes many of the important projects which PLLDF's volunteer attorneys and other supporters have accomplished this year. Let me offer a most sincere thank you to everyone who has contributed to our efforts. We could not achieve success without you!

I'd like to identify several PLLDF projects not explored elsewhere in this newsletter. One such project is *Professors' Corner*, an effort to enlist ongoing input from professors in order to put pro-life issues back on the radar screens of Massachusetts lawyers. Recognizing that legal education should never end, PLLDF instituted *Professors' Corner* in December 2014. Here is one of the five entries that have been posted to date:

“On Friday, November 6 the Supreme Court granted cert. in seven cases about the Affordable Care Act's contraceptive mandate. Petitioners include the Little Sisters of the Poor, the Archdiocese of Washington, and my own university, The Catholic University of America. The Court will consider whether the demands made of nonprofit religious employers impose a substantial burden on religious exercise. We believe that they do. Faith is not just something we practice in the pews or teach in the classroom. It informs every aspect of our institutional life. It is not the role of the government to decide for a person or institution what their faith demands of them. As James Madison reminded us in his *Memorial and Remonstrance against Religious Assessments*, ‘The Religion then of every man must be left to the conviction and conscience of every man; and it is the right of every man to exercise it as these may dictate.’”

President John Garvey  
The Catholic University of America  
November 10, 2015

Other *Professors' Corner* posts are inserted elsewhere throughout the newsletter. Please visit our [website](#) and [Facebook](#) periodically to read current and future entries, and please share them with your colleagues.

Here are some other active PLLDF volunteer projects in which you might have interest:

- PLLDF will submit an amicus brief on behalf of the Little Sisters of the Poor, *et al.*, which will be heard this term by the U.S. Supreme Court.
- 40 Days for Life (40 Days) is a pro-life campaign which seeks to end abortion through prayer, fasting, and peaceful vigils. A Massachusetts town recently determined that 40 Days will be prohibited from participating in future annual town celebrations on the town common because some people have felt “uncomfortable” with 40 Days’ message. PLLDF has established contact with town officials, pointing out that the town action does not meet First Amendment requirements with respect to traditional public forums because the exclusion is not content or viewpoint neutral, and is not narrowly tailored to serve a compelling state interest.
- The National Abortion Rights Action League (NARAL) recently published a scathing report criticizing Crisis Pregnancy Centers (CPCs). PLLDF is collaborating with leaders from various CPCs in the region to develop an appropriate response highlighting the valuable help CPCs deliver to pregnant women and their partners by providing information enabling them to make informed choices about their pregnancies, as well as by offering free tangible assistance.
- PLLDF is continuing to represent the American University Women for Life (AUWL) in its efforts to modify the inadequate Massachusetts abortion consent forms made available by the Department of Public Health, and to reform the harmful procedure used by Massachusetts Superior Courts in judicial bypass cases approving abortions for unemancipated minors without parental consent.

We hope that you are impressed with our efforts and that you might decide to help with a tax-deductible contribution to PLLDF.

Thank you very much.



## **HOBBY LOBBY AND MASSACHUSETTS**

Professor Dwight G. Duncan

It has been over a year since the United States Supreme Court issued its 5-4 decision in the case of [Burwell v. Hobby Lobby Stores, Inc.](#), holding that a closely-held for-profit company had the right under the federal [Religious Freedom Restoration Act](#) (“RFRA”) to refuse to cover contraceptives that could cause abortion—if the owners had religious objections to them. The Court thus recognized a religious opt-out from Obamacare’s mandate for employers to provide free coverage for contraceptives.

As [The Daily Beast](#) reported in 2012, “Unlike Obama’s law, the Massachusetts law didn’t require insurers to provide contraception for free, but it did require them to cover it.” The question naturally arises, since the Massachusetts state Romneycare has a similar mandate for contraceptive coverage, whether religious freedom in Massachusetts would likewise protect family-owned businesses from having to provide contraceptives against the religious beliefs of their owners. This is particularly compelling since Massachusetts has a majority of inhabitants that are at least ethnically Catholic, and Catholic teaching against artificial contraception (and, a fortiori, abortifacient contraceptives) is well-known.

There’s good news and bad news. Even though Massachusetts does not have a state statutory RFRA, the state’s Supreme Judicial Court (SJC) has interpreted the Massachusetts Constitution to provide RFRA-like protection to religious believers from having the state government substantially burden their free exercise of religion. And so strict scrutiny applies: the state government then has the burden of demonstrating both that the state contraceptive mandate serves a compelling or convincing state interest, and that it does so in the least religiously-restrictive way possible. And so, if the SJC were to analyze the case like the U.S. Supreme Court did, which it could, then it would decide in favor of recognizing a conscientious opt-out.

The bad news is that the Massachusetts SJC would not have to follow the U.S. Supreme Court precedent, since

the question is one of state law and the interpretation of the state constitution. The federal RFRA does not help here, since the U.S. Supreme Court said it was an unconstitutional restraint on state and local governments, and could only bind the federal government. Given the adverse reaction that the [Hobby Lobby](#) decision received, as well as the liberal climate in Massachusetts which seems to favor the Planned Parenthood line, I would not count on a favorable local ruling on this issue.

Observant Catholics could thus be put in a position analogous to that their co-religionists, few though they were at the time, experienced in Puritan Boston during the mid-1600’s when celebrating Christmas was declared illegal and subject to fine. Intolerance may once again hold sway in Massachusetts.

Keep in mind that Hobby Lobby wasn’t saying that government or other-minded employers couldn’t provide free contraceptive coverage, or that employees couldn’t obtain it on their own, just that the sincerely religious employer couldn’t, consistent with conscience, be forced to pay for it. One wonders who is the real liberal in this controversy. Given that the word liberal is derived from the Latin word meaning “free,” though, one doesn’t have to wonder for long.

*[Professor Dwight G. Duncan is a Faculty Member at the University of Massachusetts Dartmouth School of Law.]*

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### ***Professors’ Corner***

“Law students and attorneys are particularly concerned with determining human rights, and defending them. This is as it should be. We are well advised to ponder the words of Dr. Joseph Stanton, patriarch of the pro life movement in Massachusetts, who stated: ‘Protection of innocent human life in its most fragile and awesome beginning...and at its so often dependent close, is at once the highest privilege and most profound obligation of a caring and humane society.’ By embracing this sage advice, the legal community can properly compass attention to a broader understanding of human rights.”

Professor Scott FitzGibbon  
Boston College Law School  
December 1, 2014



**International Women’s Day:  
A Time for Unity, Not Division**  
(The American feminist establishment does a disservice to women through its divisive, relentless focus on abortion rights.)

Bridget L. Fay, Esq.

International Women’s Day celebrates women’s achievements and calls for greater equality. Its purple theme, symbolizing justice and dignity, is inspired by the purple, green, and white color scheme of the British suffragettes. There is an enormous amount women agree upon, and the world has thankfully come to understand that human rights are women’s rights. Unfortunately, the persistent desire of various women’s groups to advance a pro-abortion agenda divides woman and against woman, and often short circuits genuinely necessary efforts for women’s advancement.

[In spring of this year], the United Nations [released a statement](#) in commendation of the day, acknowledging the strides made by women in education, employment, and politics, but calling for an end to violence against women and recognizing the work still left to be done in advancing women’s rights around the world:

Speaking at the High-Level Thematic Debate on Advancing Gender Equality and Empowerment of Women and Girls for a Transformative Post-2015 Development Agenda this morning, UN Secretary-General Ban Ki-moon admitted that the world had seen “important advances” for gender equity over the past two decades as women’s participation in political life has increased, maternal mortality has dropped, and the gender gap in primary education has closed.

Phumzile Mlambo-Ngcuka of the U.N. called upon governments to, inter alia, engage in lawmaking that enables women to “take responsibility for their own bodies and health.”

It is a simple fact that worldwide, women cannot take charge of their own bodies and health. Women in China face threats to their reproductive rights from the one-child policy, which institutionalizes forced abortion and sterilization. Predictably, this policy has harmed women’s psyches: [China is one of only two countries](#) where women commit suicide at greater rates than men do. The ratio of female-to-male suicide in China is three-to-one.

In other countries, women and girls are subjected to female genital mutilation (FGM), which destroys their ability to experience sexual pleasure and causes infections, sterility, and sometimes death. Millions of women lack access to a physician to help them deliver a child. Many others are forced into sex trafficking, sold at auctions, or compelled to seek out prostitution as their only means of support. Often, women lack the social capital to refuse sex, or are encouraged to have sex in a way that promotes the spread of disease.

Happily, the world has not been indifferent to these problems. Efforts to end attacks on women’s rights have come from across the political and religious spectra. Feminists and evangelical Christians have [worked side-by-side to combat sex trafficking](#). All Girls Allowed, [which combats gendercide in China](#), was founded by pro-life Christian Chai Ling. One of the [most prominent critics of FGM](#), Ayaan Hirsi Ali, is at once an atheist, a feminist, and a scholar at the conservative-leaning American Enterprise Institute.

As we celebrate the advancement of women both in America and around the world, the schism between the unifying, almost universally accepted goals of International Women’s Day and the most notable component of American feminism’s version of “reproductive and sexual health” comes into stark relief. The American media and the more prominent women’s groups perpetuate the myth that support for women’s rights is inextricably intertwined with support for abortion rights.

Women are not a monolithic group, and do not hold the same ideas on abortion. [A 2013 Gallup poll found](#) that 51 percent of U.S. adults think that the public is mostly pro-choice, compared with only 35 percent who think that the public is mostly pro-life. Yet the same poll found that women are evenly split in their personal opinions on abortion, with 47 percent pro-choice and 46 percent pro-life.

The abortion divide applies to women in office, as well. A majority of America’s women governors are pro-life, and Wendy Davis, who became the standard-bearer for the pro-choice movement after filibustering a Texas ban on late-term abortions, not only lost her election but [lost the women’s vote by five points](#). The reality is that women who want to see other women advance in the public sphere often also support the right to life.

Continue *International Women’s Day* on page 8.

## PLLDF PHYSICIAN-PRESCRIBED SUICIDE TESTIMONY

The Massachusetts Joint Committee on Public Health held a public hearing on October 27, 2015 regarding HB No. 1991, the so-called Massachusetts Compassionate Care for the Terminally Ill Act. PLLDF submitted oral and written testimony before attentive members of the committee. Here is PLLDF's oral testimony.

Mr. Senate Chair, Madam House Chair, Honorable Members:

Thank you for the opportunity to address you today. The oral testimony is limited to three minutes. More expanded written testimony has been filed with this committee today.

My name is Robert Joyce. I testify as President of the Pro Life Legal Defense Fund, which has provided pro bono legal services protecting human life for over 40 years.

I oppose House Bill 1991 for a constitutional reason and because of the effects it would have on the human rights of terminally ill patients in Massachusetts – and on our institutions.

First, the constitutional problem:

Provisions in this bill, constitutionally analogous to the statutory burdens restrained by the Supreme Court in the challenge of the Little Sisters of the Poor to provisions of the Affordable Care Act, impermissibly burden faith-based health care providers which refuse to participate, requiring them to refer patients to others who will provide lethal doses, and even requiring them to pay for the transfers.

Next, the effects on the human rights of terminally ill patients in Massachusetts.

Freedom from abuse is a human right. Reported cases of elder abuse in Massachusetts grew 33% in four years – to 21,300 in 2013 – and there was an 8% increase in confirmed cases from 2012 to 2013.

Elder abuse includes financial exploitation. The poor witnessing provisions of the bill, at the times of request and administration, invite financial exploitation. Reasonable safeguards are not provided at the request, and no witnesses are required at administration. If undue pressure occurs then, who would even know?

And subtle financial exploitation is also a risk at the institutional level. On two occasions, PLLDF has stopped the Massachusetts General Hospital (MGH) from withholding resuscitation and lifesaving treatment from patients who just wanted to live. Our request whether payments for medical care had been suspended, or threatened, went unanswered. We still don't know – and neither do you. The bill would exaggerate this problem. This issue requires transparency, and PLLDF recommends that you investigate.

The high costs of end-of-life care, increasing premiums, the demands on taxpayer resources, and the potential erosion of inheritances – all from those who have a compelling financial interest in a patient's premature death – can threaten the human rights of elderly and/or disabled persons.

Furthermore, patients in Massachusetts are already under substantial pressure to acquiesce on life-sustaining care. For example, MGH has a so-called "Optimum Care Committee" (OCC) which reportedly denied resuscitation and/or life sustaining care, on a unilateral basis, in 147 cases since 2006. Shockingly, 41% of those reported cases had been for other than end stage situations (i.e. for cases deemed "potentially reversible"). The bill, which allows completion of the process in just one day, would exaggerate this problem. This matter also requires transparency, and PLLDF recommends that you investigate.

In truth, there are simply not enough courts, not enough social workers, and not enough lawyers to meet the abuse challenges this bill presents. And it would be particularly harsh for elders who do not have loving families, or who have lost their circle of friends, or who have no one to advocate for them, or who cannot finance a legal battle.

The only way to effectively prevent this foreseeable increase in elder abuse in Massachusetts is to refuse to empower it.

I urge the Honorable Members of this committee to consider these points, and having done so, to report this Bill "Ought Not to Pass," and I offer PLLDF's free participation to any of you during your considerations.

Robert W. Joyce, President  
Pro Life Legal Defense Fund, Inc.

**PLLDF – NATIONAL EFFORT**

Larissa M. Warren

I am grateful to have received PLLDF sponsorship to attend the [National Institute for Family and Life Advocates](#)

(NIFLA) Legal & Medical Summit this November. NIFLA has provided legal counsel, education, and training to Pregnancy Resource Centers (PRC) since 1993.

The Summit highlighted emerging issues in the pro-life movement. One issue is the [abortion pill reversal](#). This series of progesterone treatments seeks to offset the effect of the first pill in the RU486 abortion pill series for women who decide to keep their child after taking the first pill. Nearly 100 babies were born as a result of the treatment by 2015, with no major birth defects, and now another 75 pregnancies are progressing and healthy after the mother decided to attempt to stop the abortion pill. The treatment has been effective 60% of the time, to date. NIFLA is seeking doctors willing to receive referrals from the abortion pill reversal hotline and treat patients who want a way out of RU486. See [www.abortionpillreversal.com](http://www.abortionpillreversal.com) for more information.

The Summit also addressed legal advocacy in forced abortion situations. Forced abortions result from coercion, threats, or violence from the woman's partner or parent. The law provides protection for women and girls to choose to bear their children. Lawyers can offer advocacy in cases of coerced abortion. [The Justice Foundation](#) ([www.thejusticefoundation.org](http://www.thejusticefoundation.org)) provides useful sample letters informing fathers and/or parents of pregnant minors about a woman's right to be free of coercion, exhorting them to cease efforts to unduly influence the woman's decision.

The NIFLA Summit brought lawyers, PRC directors, nurses, and non-profit board members from around the country to discuss these and other important issues. Seeing the love the attendees have for women, the passion for providing holistic options, and the comradery of a multi-disciplinary group was an encouraging reminder of the hope and strength of the pro-life community! Here in Massachusetts, the pro-life community has similar strengths. We should continue working collaboratively as students, lawyers, doctors, and others who believe in the importance of

advocating for life on behalf of those whose voices we cannot yet hear.

*[Larissa Warren is a 3L at Boston College Law School and President of its pro-life student group, Lex Vitae.]*

**PLLDF – INTERNATIONAL IMPACT**

Rodrigo Cal y Mayor

I was happy to learn about PLLDF through one of its volunteer attorneys. As a Mexican undergraduate business student at Boston University, and a pro-life supporter, I was even happier to

learn that I could volunteer for PLLDF. For a period of five months, my volunteer efforts have enabled me to learn much about pro-life in America, and to share much about pro-life in Mexico.

In 2007, Mexico's Supreme Court declared a constitutional right for the woman to obtain abortions, and Mexico City has decriminalized abortion fully before the 12<sup>th</sup> week of pregnancy. But my country has a high appreciation for life. Accordingly, the Congress of Nuevo Leon state enacted an "anti-abortion law." Also, in apparent defiance of the Supreme Court's decision, all states other than Mexico City amended their legislation to continue to criminalize abortion with individual exceptions.

Mexico is a Catholic country. When Mexico's Congress passed a law liberalizing abortions, many Mexicans mobilized against it. Today the biggest Pro-life Movement is the "National Pro-life Committee," but there are also many Catholic movements and/or other private initiatives. I believe that opposition to abortion in Mexico will continue to grow because the Catholic Church, the governments, the laws, the people, and significantly, the media, show strong support for life.

I am proud to do all I can to advocate for life in Mexico and in the United States. I appreciate the opportunity to work with PLLDF, and encourage other undergraduates to consider doing the same.

*[Rodrigo Cal y Mayor is an exchange student and senior at BU.]*



## MASSACHUSETTS ALLIANCE TO STOP PUBLIC FUNDING OF ABORTION

Thomas M. Harvey, Esq.

Since 1981, as a result of a Supreme Judicial Court ruling in [Moe v. Secretary of Administration and Finance](#), abortions in Massachusetts have been subsidized by the taxpayer. The court stated in that case that abortion was a “fundamental right” and that it was a broader right under the Massachusetts Constitution than it was under the U.S. Constitution. The case essentially held that indigent women were constitutionally entitled to have their abortions subsidized by the taxpayer. Although perhaps unknown even to most pro-lifers, Massachusetts taxpayers have been paying for abortions ever since that court ruling.

The [Massachusetts Alliance to Stop the Public Funding of Abortion](#) ("Alliance") was formed earlier this year in an effort to address this situation. The mission of the Alliance is to amend the Massachusetts Constitution by adding the following: “No provision of this constitution shall be construed as requiring the public funding of abortion.”

The Alliance’s short term goal was to make the public funding of abortion a political issue in Massachusetts. If the Massachusetts Constitution could be amended so that taxpayer-subsidized abortions were not a constitutional entitlement, then the matter could be presented to state legislators for consideration. The proposed amendment would take only a small, but necessary, step. It would set the table so that at a future date, the legislature would be empowered to vote on the public funding of abortion.

The Alliance determined that the only politically feasible way to amend the Massachusetts Constitution to effect this change was by initiative petition under its Article XLVIII. This involved a four step process:

1. Obtain a number of certified signatures on the petition that is in excess of 3% of the total number of votes cast for all candidates in the previous gubernatorial election. According to the Secretary of the Commonwealth, the petition must be signed by a minimum of 64,750 certified voters, not more than one-

fourth of which can be those of registered voters of any one county.

2. Have one-fourth of the Massachusetts General Court (the legislature) vote in favor of advancing the amendment to the ballot.
3. In the following General Court, again get one-fourth of the legislature to vote in favor of advancing the amendment to the ballot to be voted on at the next state election.
4. Once on the ballot, targeted for November of 2018, a majority of votes actually cast on that specific question must be affirmative to pass the amendment. Additionally, at least 30% of the total ballots must include an affirmative vote on the specific question.

In July of this year, the Alliance began by filing the proposal, signed by ten registered voters, with the Attorney General (AG). Planned Parenthood League of Massachusetts filed an opposition, but the AG certified the petition as proper for submission to the people.

As of this writing, a grassroots effort is being made to collect the required 64,750 certified signatures before November 18. If the signatures are collected and timely submitted to the Secretary of the Commonwealth’s Office then, according to the Massachusetts Constitution, the proposal shall be laid before a joint session of the legislature before the first Wednesday in May of 2016.

The Alliance sought support from a multitude of pro-life organizations. PLLDF encouraged volunteers to support the Alliance’s effort by publicly endorsing this petition drive as “[a] big and immediate challenge ... and a great opportunity for pro-lifers to advance the pro-life cause in a significant way.”

At a minimum, this endeavor of the Alliance has educated numerous Massachusetts citizens regarding how their tax dollars are being used. Further, it has activated numerous pro-life citizens who at long last had an opportunity to take the offensive on the abortion issue in Massachusetts. Whether the signature drive is successful or not, these citizens, and the Alliance, intend to keep up the fight in the future in this most noble cause. The lives of unborn babies are at stake.

*[Thomas M. Harvey, Esq., is a member of the PLLDF Board of Directors]*

*International Women’s Day*, continued from p. 4.

Yet prominent women’s political groups like NARAL Pro-Choice America and Emily’s List focus almost exclusively on the pro-choice message; in fact, the one enumerated criterion for support by Emily’s List is that a candidate be pro-choice. Their celebrations of International Women’s Day reflect this singular focus.

By equating controversial ideas about abortion with human-rights abuses, the American feminist establishment does a disservice to the women’s movement: It alienates some of its strongest allies and silences the dissenting voices of pro-life women.

If we as women focus our energies on advancing the human rights that we all agree on, we will have much more to celebrate come next year’s International Women’s Day.

*[Bridget L. Fay, a member of PLLDF’s Board of Directors, is an attorney, a former chemical engineer, and a member of Women Speak for Themselves, a grassroots group whose mission is to offer a more thoughtful and complete version of women’s freedom.]*

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**LAW STUDENT VOLUNTEERS**

Hanford Chiu again represented PLLDF at the Boston Bar Association’s Pro Bono Fair at Suffolk University Law School. The event took place on October 19, 2015, and many students expressed interest in PLLDF.



Law students and attorneys gathered recently at PLLDF’s office to discuss current issues, volunteer opportunities, and network. Pictured are students from Boston College Law School and Suffolk University Law School.

**Professors’ Corner**

Legal scholars generally agree with Aristotle that the metaphysical “goods” of life, friendship and truth should be preserved in the public sphere. Concurring lawyers and professors of law can facilitate that preservation by affirming truths that we all experience: none of us want to live with the risk of being killed, deceived, disrespected, or despised. When we stop advocating for these fundamental goods – especially on behalf of the vulnerable at the margins of life – we start contributing to the collapse of a just society. Let’s start from the beginning, by protecting life: the first good first!

Professor Angela Vidal Martins  
UFRGS/Research at Harvard Law School  
September 3, 2015

**SAVE THE DATE  
2016 CENTURY DINNER**

PLLDF founder and Massachusetts pro-life legend, Roy R. Scarpato, will receive the 2016 Thomas More award at the 2016 Century Dinner, which will be held at the Boston Marriott Newton on Friday, April 22, 2016. Please mark your calendars to participate in this tribute to a true pro-life icon.

**CAN YOU HELP US?**

It would be wonderful if you can make a financial contribution to PLLDF. Your generosity would allow us to provide trained and committed pro-life voices in our courtrooms and other public forums. Please help us continue our life-saving work.

**We appreciate and use every dollar wisely!**

Please send your **tax-deductible** donation to:

Pro Life Legal Defense Fund,  
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**PLLDF is a 501(c)(3) non-profit entity.**

Visit PLLDF online at [www.plldf.org](http://www.plldf.org).