Exhibit A

INTERVENOR COMPLAINT OF DR. ALLEN Palmer

Missouri Department of Health and Senior Services
P.O. 80x 570, Jefferson City, MO 55102-0570 Phone: 573-751-8400 FAX: 573-751-8010
RELAY MISSOURI for Hearing and Speech Impaired 1-800-735-2988 VOICE 1-800-735-2968
Jane Drummond



Matt Blunt Governor

SENT VIA FAX 816-221-8449

August 28, 2007

Teresa A. Woody The Woody Law Firm, PC 1044 Main Street, Suite 500 Kansas City, MO 64105

RE: Women's Care Gynecology, Inc., and Dr. Allen Palmer

Dear Ms Woody:

In response to your letter, it is the Department's position that as of August 28, 2007, all establishments that perform or induce any second or third trimester abortions or five or more first trimester abortions per month must comply with 19 CSR 30-30.010 through 19 CSR 30-30.040 governing ambulatory surgical centers. Section 197.200, RSMo, does not provide an exception for a private physician's office.

There is no grandfather clause for pre-existing establishments. However, consistent with prior practice, the Section for Health Standards & Licensure will collaborate with Women's Care Gynecology, Inc., and Dr. Palmer to establish a timeline and process for complying with the existing regulations. We expect that Women's Care Gynecology, Inc., and Dr. Palmer will enter into this collaboration in good faith and understand and appreciate the urgency of bringing the establishment into compliance with the regulations.

If the Department detects a lack of commitment to assertively moving toward compliance, the Department will take appropriate action to protect the health and safety Missouri's women.

Please have your client contact me no later than August 29, 2007 by 4 pm to begin the process of bring Women's Care Gynecology, Inc., into compliance with current statutes.

Respectfully,

Dean Linneman.

Section Administrator

Section for Health Standards & Licensure

www.dhae.mo.gov

Healthy Missourians for life.

The Missouri Department of Health and Senior Services will be the leader in promoting, protecting and partnering for health.

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER: Services provided on a nondiscriminatory basis.

Exhibit B

INTERVENOR COMPLAINT OF DR. ALLEN Palmer



ADMINISTRATION OFFICE 6401 W. 109th Street, Soire 200 Overland Park, 88 06211 (913) 512-5100

Coupania Cestra 711 North Providence Road Columbia, MO 65203 (573) 463-0427

Havs Content 122 East 12th Street Huys, KS 67601 (785) 628-2434

Tropressure Central S15 North Noland Road, Seite 6 Independence, MO 64050 (816) 252-3800

JUTTURON CHY CHATER
1 (00 Southwest Blvd, Sune B-Jufferson City, MO 65109
15731 635-2982

LAWRENCE CENTER 2108 West 27th Street, Suite J Lawrence, RS 66046 7785) 632-0281

Party Buots Cestral 1501 East Emanuel Cleaver II Blod. Kansas City, MO 64110 6816) 756-2277

NORTH KARSAS CIPY CHARTER 4112 N.E. Vivion Road Kansasa City, MO 64119 68163-6880

Senatia Certific 1708 West 9th Street Sedalis, MO 65301 (660) 826-7377

South Konsos City Center 1)902 Blue Ridge Ext., Sure T Grandview, MO 64030 (S161 763-2125

Waterstone Certes on Burkarh, Suite A Warrensburg, MO 64093 1000 747-0160

Withorta Control 2226 East Central Wichita, KS 67214 1 3161 263-7575 July 18, 2007

Health Services Regulations
Missouri Department of Health and Senior Services
Attn: Verla Summers, Health Services Coordinator
P.O. Box 570
Jefferson City, Mo 65102

Dear Ms Summers.

I am writing to apply for licensure of the Columbia Center of Planned Parenthood of Kansas City & Mid-Missouri ("Columbia Center"), in Columbia, Missouri, as an abortion facility under the Ambulatory Surgical Center Licensing Law, Mo. Rev. Stat. §§ 197.200 to 197.240, and its implementing regulations, 19 Mo. Code Regs. §§ 30-30.010 to 30-30.070. Attached please find my Application for Abortion Facility License and a check for \$200 made out to the Department of Health and Senior Services ("DHSS").

As you are aware, the recently enacted HCS/HB 1055 amended Mo. Rev. Stat. § 197.200 by changing the definition of "ambulatory surgical center" to include "any establishment operated for the purpose of performing or inducing... five or more first trimester abortions per month." The amendment to Mo. Rev. Stat. § 197.200 is scheduled to go into effect on August 28, 2007.

I understand that DHSS may be in the process of issuing new regulations governing ambulatory surgical centers. However, the fact that these regulations have not yet issued, and that the licensing obligation goes into effect on August 28, 2007, necessitates applying for licensure of the Columbia Center under the current regulations in order to ensure continuity of abortion services.

I am also writing to confirm my understanding that, as explained below, the licensure obligation does not apply to a second facility also operated by

As amended, the full definition of "ambulatory surgical center" now reads: "any public or private establishment operated primarily for the purpose of performing surgical procedures or primarily for the purpose of performing childbirths, or any establishment operated for the purpose of performing or inducing any second or third trimester abortions or five or more first trimester abortions per month, and which does not provide services or other accommodations for patients to stay more than twenty-three hours within the establishment, provided, however, that nothing in this definition shall be construed to include the offices of dentists currently licensed pursuant to chapter 332, RSMo." Mo. Rev. Stat. § 197,200.

Planned Parenthood of Kansas & Mid-Missouri, the Patricia Brous Center ("Brous Center") in Kansas City, Missouri.

The Columbia Center

The Columbia Center provides general reproductive health care, including family planning services, testing and treatment for sexually transmitted infections, cervical and breast cancer screening services, pregnancy testing, all-options counseling, and first trimester abortion services. The Columbia Center began providing abortions in 1975.² The Columbia Center provides both medication and first-trimester surgical abortions. With some schedule variation, it provides these services approximately one day a week.

Prior to the amendment to Mo. Rev. Stat. § 197.200, a facility such as the Columbia Center that provided five or more first trimester abortions per month, but was not operated primarily for the purpose of performing surgical procedures, was not required or eligible to obtain a license from DHSS.

The Columbia Center is preparing to comply with all requirements for licensure as an abortion facility. By the amendment's effective date of August 28, 2007, the Columbia Center will be in full compliance with the requirements of 19 Mo. Code Regs. §§ 30-30.050, 30-30.060, and 30-30.070(3). Cary Goodman, an architect registered in Missouri, is preparing plans demonstrating compliance. I will submit these plans in the next several days. The Columbia Center stands ready to be surveyed by DHSS to demonstrate compliance, or to be advised of any recommendations for correction and/or improvement. I also certify that, pursuant to Mo. Rev. St. § 197.215, each member of the Columbia Center surgical staff is a physician licensed to practice in Missouri; that surgical procedures at the Columbia Center shall be performed only by physicians with privileges to perform surgical procedures at the University of Missouri's University Hospital; that continuous physician services or registered professional nursing services will be provided whenever a patient is in the facility; and that adequate medical records for each patient will be maintained.

Should DHSS determine that any additional changes, documentation, or information are required for licensure, I request that you alert me as immediately so I may take appropriate steps to ensure that the Columbia Center is able to continue providing abortion services when the amended version of Mo. Rev. St. § 197.200 goes into effect on August 28, 2007.

The Brous Center

The Brous Center provides general reproductive health care, including family planning services, testing and treatment for sexually transmitted infections, cervical and breast cancer screening services, pregnancy testing, all-options counseling, and medication abortion. The Brous Center does not provide surgical abortions, or any other surgical procedure.

² The Columbia Center ceased providing abortion services in 1999, and resumed in 2002.

Medication abortion is a Food and Drug Administration-approved, non-invasive method of terminating an early pregnancy by oral medication. It is commonly provided out of doctors' offices and clinics nationwide. If DHSS would like more information about the Brous Center's medication abortion protocols, I would be happy to provide it.

Because the Brous Center does not perform any surgical procedures, it is my understanding that it is not required to be licensed by DHSS as an ambulatory surgical center. Requiring the Brous Center to be licensed as an ambulatory surgical center based on prescription of medication – an act which is in no way a surgical procedure – would be nonsensical.

I hereby request your written confirmation that the Brous Center is not required to be licensed as an ambulatory surgical center in order to continue lawfully providing medication abortion. If this is not the understanding of DHSS, please alert me immediately so I may take appropriate steps to ensure that the Brous Center is able to continue providing abortion services when the amended version of Mo. Rev. St. § 197.200 goes into effect on August 28, 2007.

Sincerely,

Peter Brownlie President/CEO

Enc: Application for Abortion Facility License

MO 580-2012 (8-01)

MISSOURI DEPARTMENT OF HEALTH AND SENIOR SERVICES HEALTH FACILITY REGULATION

P.O. BOX 570 JEFFERSON CO

My Appl. Expires 8-17

APPLICATION FOR ABORT	TION -	-3.7 2.105/1 5/7 f, MC 651(62-05/0
FACILITY LICENSE	☑ INITIAL APPLICAT	TION RENEWAL APPLICATION
In accordance with the requirements of the (Sections 197.200 through 197.240, RSMo), a maintain an Abortion Facility [see 19 CSR : Abortion Facilities, (1)(A)(B)].	pplication is hereby made for a license to cond	DO NOT WRITE IN THIS SPACE
NAME OF FACILITY (HAME TO APPEAR ON LICENSE)		TELEPHONE NUMBER
Columbia Center, Planned Para	enthood of Kansas + Mid-Mi	SSOUCI
711 North Frovidence Road	Columbia, Mo 65203	
Boone	ADMINISTRATOR	
MANAGEMENT	L. Forest A	Vew Heart
NON PROFIT	I DOGDUTTON	
	PROPRIETARY	
CORPORATION ·	☐ INDIVIDUAL	☐ CORPORATION
OTHER (SPECIFY)	☐ PARTNERSHIP	
	E PARTNEHSHIP	OTHER (EXPLAIN)
CHIEF OFFICER OF GOVERNING BODY		
Peter B. Brownlie	LEGAL NAME OF OPERATING COR	
F OPERATED BY MANAGEMENT CONSULTANT, NAME OF FIRM	Planned rarentho	od of Kansas + Mid-Missouri
STAFFING (NUMBERS)	OB/GYN CONSULTANT	[19 CSR 30-30.060 (1)(C)5.]
PERSONNEL PHYSICIANS	nang .	
HUMBER OF ABORTIONS PER YEAR	Orrin Moore,	M. D.
Approx. 500	Licensed Ob	/ Gyn
CERTIFICATION		/ 614/1
Pefer B. Brown / i.e.	ROFPAHINGESHE and L. Forest A	Jaw Hacht
being duly swom by me on their outh discesses as	R OF PARTNERSHIP	ADMHISTRATOR
being duly swom by me on their cath, deposes ar therein are correct and true and of their knowledge	or says that they have read the foregoing app	plication and that the statements contained
	, and minimit gives assurance of the shifts an	distriction at the finite making from the all
EXACT LEGAL NAME (CONTINUED)	1-Missouri Abortion Facility to comply wi	th the regulations and codes promuloated
under the Missouri Ambulatory Surgical Center Lice	ansing Law (sections 197,200 through 197,240	D. RSMo). Regulations and Codes
It is further certified that the	olumbia Center	Transfer in Suitablis And Codes.
will comply with all recommendations for correction by the Department of Health and Senior Services a	and/or improvements as contained in the mos	it recent Licensing Survey Report prepared
PRESIDENT OF PASTEER OWNER OR ONE NATHER OF	A SOLUTION TO SAID ADDITION FACILITY.	_
- Acat Down		112
NOTARY PUBLIC EMBOSSER OR STATE OF BLACK RIK RUBBER STAMP SEAL	- L. torest	TY (OR CITY OF ST, LOUIS)
Lanoas		
SUBSCRIBED AND SWORN I		ornous
NOTARY PUBLIC SIGNATURE	DAY OF JELLY YEAR 2007 USE	RUBBER STAMP IN CLEAR AREA BELOW.
_D n	MY COMMISSION EXPIRES	
Deanie h	Payer 8-17-2010	A NOTARY PUBLIC - State of Kansas
NOTIFITY PUBLIC NAME (TYP		Leanne Mayer
O SO-3012 (B-01)	MAYER	My Appl. Expires 8-17-10

Exhibit C

INTERVENOR COMPLAINT OF DR. ALLEN Palmer

Missouri Department of Health and Senior Services

P.O. Box 570, Jefferson City, MO 65102-0570 Phone: 573-751-6400 FAX: 573-751-6010 RELAY MISSOURI for Hearing and Speech Impaired 1-800-735-2966 VOICE 1-800-735-2466

Jane Drummond Director



Matt Blunt Governor

July 31, 2007

Peter Brownlie President/CEO Planned Parenthood of Kansas and Mid-Missouri 4401 W. 109th Street, Suite 200 Overland Park, KS 66211

Dear Mr. Brownlie:

This is to acknowledge the receipt of your application and fee for licensure as an abortion facility on July 19, 2007, and additional information on July 24, 2007, for the Columbia Center of Planned Parenthood of Kansas and Mid-Missouri.

A review of the information received on July 24, 2007, reveals that some additional documentation is needed. Please provide the following:

- 1. Evidence that physicians performing abortions at the facility have staff privileges at a hospital within fifteen (15) minutes' travel time or proof of a working agreement between the facility and a hospital within fifteen (15) minutes' travel time from the facility granting the admittance of patients for emergency treatment whenever necessary.
- 2. A copy of the medical staff bylaws.
- 3. Fire and disaster plans/procedures for the facility.

In addition, the facility-building plan received on July 24, 2007, has been reviewed by the health facility plan review staff of the Missouri Department of Health and Services, Division of Regulation and Licensure. The following items were noted in the preliminary review for compliance with 19 CSR 30-30.070 Physical Standards for Abortion Facilities:

- 1. Patient corridors were not at least six (6) feet wide.
- 2. All doors through which patients pass were not at least forty four (44) inches wide.
- 3. Scrub facilities are not located outside and immediately available to the procedure rooms as required but are located within the procedure rooms.

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- 4. Procedure rooms are not at least twelve (12) feet by twelve (12) feet in size and the minimum ceiling height of nine (9) feet could not be verified.
- 5. Personnel change rooms equipped with a toilet and a lavatory are not provided for each sex; there is only one staff change room and one staff toilet.
- 6. A sterilizing room (separate from the laboratory) equipped with a steam sterilizer, counter, sink, and storage for clean supplies is not provided.
- 7. A soiled/decontamination room with a counter and sink is not provided.
- 8. At least two (2) patient change rooms with secure storage for personal effects are not provided.
- 9. A counseling room at least (10) feet by ten (10) feet in size is not provided.
- 10. Space for at least four (4) recovery beds with three (3) feet clear space around the beds is not provided. With two (2) procedure rooms the space would have to accommodate at least eight (8) recovery beds or recliners.
- 11. Additional information concerning the building is needed including more details such as the construction type and the number of stories. Also needed would be HVAC drawings, electrical drawings, and drawings for medical gas systems and suction equipment.

Please provide the requested information and and/or your response to these items at your earliest convenience. Please address any correspondence regarding this matter to Terry Wenkel or Verla Summers, Missouri Department of Health and Senior Services, Bureau of Health Services Regulation, P.O. Box 570, Jefferson City, MO 65102.

In response to your questions concerning the licensure requirements for the Patty Brous Center, the licensing laws for this type of facility will change with the enactment of HB 1055.

The new legislation will change the definition of an ambulatory surgical center to read as follows:

"any public or private establishment operated primarily for the purpose of performing surgical procedures or primarily for the purpose of performing childbirths, or any establishment operated for the purpose of performing or inducing any second or third trimester abortions or five or more first trimester abortions per month, and which does not provide services or other accommodations for patients to stay more than twenty-three hours within the establishment, provided, however, that nothing in this definition shall be construed to include the offices of dentists currently licensed pursuant to chapter 332, RSMo;"

With this new definition, the medication abortion as described in your letter would be considered an inducement of an abortion. Therefore, any facility where five or more medication abortions per month are induced would be considered an ambulatory surgical center and would need to meet all the licensure requirements associated with ambulatory surgical centers.

Should you have any questions regarding this matter, please don't hesitate to contact the Bureau of Health Services Regulation at (573) 751-6303.

Sincerely,

Dean A. Linneman, Administrator

Section for Health Standards and Licensure

573-526-1864/FAX: 573-522-9712

DAL

cc: Jane Drummond, Director, Department of Health and Senior Services
David Durbin, Director, Division of Regulation and Licensure
Terry Wenkel, Health Care Regulatory Supervisor, Bureau of Health Services Regulation