CENTER *for*
REPRODUCTIVE
RIGHTS

November 18, 2026

VIA EMAIL

The Honorable Joshua Kaul
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Dear Attorney General Kaul, Secretary Romanski, Secretary Baumann, and Dr. Schmeling:

The Center for Reproductive Rights, a nonprofit organization that has long advocated for access to quality reproductive health care across the nation, represents Codyone Cameron—a Wisconsinite who lost her fertility and nearly lost her life after seeking care at anti-abortion pregnancy center Life's Connection. Ms. Cameron was induced by its fraudulent advertising to visit and undergo an ultrasound examination, during which she was falsely diagnosed with an intrauterine pregnancy, causing her to dismiss symptoms of abdominal pain and delay seeking further evaluation for ten days. By the time that Ms. Cameron was diagnosed with a suspected

ectopic pregnancy, her right fallopian tube was at risk of rupture and emergency surgery was needed to avoid the risk of a life-threatening hemorrhage. As a result, Ms. Cameron has lost both of her fallopian tubes, meaning that she can no longer become pregnant without in-vitro fertilization—a prohibitively expensive procedure not covered by Medicaid.

On behalf of Ms. Cameron, the Center respectfully requests that your offices investigate the practices of anti-abortion pregnancy centers fraudulently advertising to pregnant people that they can determine pregnancy location and/or viability using ultrasonography and permitting staff to conduct ultrasounds and provide such diagnoses without adequate clinical supervision and/or training. By leading pregnant people to believe that their services are adequate substitutes for medical diagnoses based on timely interpretation of ultrasonography by qualified clinicians, anti-abortion pregnancy centers provide false reassurance to pregnant people and delay them from obtaining time-sensitive medical care, placing their health and lives in grave danger. At minimum, these practices violate Wisconsin's prohibitions on fraudulent representations, unfair trade practices, deceptive fundraising practices, and unlicensed practice of medicine.[1] As detailed below, Wisconsin law empowers your offices to investigate Life's Connection and the similarly deceptive and dangerous practices of anti-abortion pregnancy centers throughout Wisconsin and to initiate actions for injunctive relief, and we urge you to do so.[2]

BACKGROUND

Ms. Cameron's Encounter with Life's Connection

Ms. Cameron is a 32-year-old woman and a single mother to a twelve-year-old son and a six-year-old daughter. She also has a history of pregnancy loss. Ms. Cameron's first pregnancy ended in a miscarriage and her third pregnancy—which was a tubal ectopic pregnancy—nearly ruptured her left fallopian tube in 2016. Ms. Cameron lost so much blood during the emergency surgery to remove the ectopic pregnancy that she required multiple transfusions.

Ms. Cameron learned that she was pregnant again at the end of August 2026. She made an appointment to establish care with an Ob/Gyn at Froedtert on September 21 but, approximately three weeks before that appointment, began to experience pain in her right abdomen. Given her traumatic history of pregnancy loss, Ms. Cameron became concerned that this pregnancy might also be abnormal and wanted to be evaluated as soon as possible.

Ms. Cameron called a service provider listed on a resource from her Medicaid policy and was referred to Life's Connection. Ms. Cameron visited Life's Connection's website, which advertises "Pregnancy Care and Support," including "free limited obstetrical ultrasounds"[3] to:

[1] The Center has consulted with Wisconsin counsel, Michelle M. Kemp (Wis. Bar No. 1023801) of Ashurst Perkins Coie US LLP, regarding the application of the cited Wisconsin statutes and law to the conduct described herein.
[2] *See* Wis. Stat. §§ 100.18(11)(a), (d), 100.20(2)(a), (3), (4), (6), 202.07(1m), 202.18(1)(a), 448.11, 823.02 (2023–24).
[3] "Pregnancy Care and Support," Life's Connection, archived October 22, 2026, at https://perma.cc/HFJ8-JMUJ.

"Confirm Pregnancy," "**Determine viability (whether the pregnancy is developing in the uterus with a detectable heartbeat),**" and "Estimate gestational age."[4] Life's Connection's website defines "viable pregnancy" as: "the fetus is located within the uterus and a heartbeat is present, **as determined by a trained medical professional**." Based on these representations, Ms. Cameron believed that Life's Connection would be able to determine whether her pregnancy was developing in her uterus or was ectopic. She called Life's Connection and made an appointment for an ultrasound scan at the Waukesha location on September 1.

At Life's Connection, Ms. Cameron explained to a worker dressed in scrubs that she believed she was pregnant, was feeling concerned because of her history of ectopic pregnancy, and wanted to know if her pregnancy was in her uterus. Ms. Cameron was given a pregnancy test, which was positive. The Life's Connection worker then led Ms. Cameron to an examination room and performed a transabdominal ultrasound examination. When the worker initially had trouble locating Ms. Cameron's pregnancy, Ms. Cameron again expressed concern that it might be ectopic. The Life's Connection worker reassured Ms. Cameron and, after a few moments, pointed out what she referred to as "the yolk sac" on the screen. The worker told Ms. Cameron that her baby was inside her uterus and expressed happiness for Ms. Cameron. Ms. Cameron was given several ultrasound images with text stating: "BABY! HI MOM!"; "BABY!" "HI DAD!"; and "LITTLE BEAN! HI MOM!"[5] She was also given a document that reported several measurements based on the ultrasound, including an estimated due date based on actual ultrasound age of April 28, 2027, crown-rump length of 0.40 centimeters, and gestational sac measurement of 0.83 centimeters. Ms. Cameron was told to come back for another appointment with a physician on September 15, but at no point during Ms. Cameron's September 1 visit to Life's Connection did she interact with anyone who identified as a physician.

Ms. Cameron left her appointment with Life's Connection feeling reassured. Although she continued to experience abdominal pain, she wrote her symptoms off in light of the reassurance she had received from Life's Connection. After more than a week, Ms. Cameron's symptoms had increased in severity until she could no longer ignore the feeling that something was off. To get another assessment, Ms. Cameron made an immediate appointment at Care for All, a community clinic that provides comprehensive reproductive health care and offers services regardless of ability to pay.

At Ms. Cameron's September 11 appointment at Care for All, she reported to her physician her pregnancy history and her visit to Life's Connection and showed her physician an ultrasound image from Life's Connection. As documented by Ms. Cameron's Care for All physician:

> She was seen at Life's Connection (a free clinic) for an early ultrasound which was reported to the patient as an intrauterine pregnancy. Patient brought the ultrasound picture in today with her. Picture shows what appears to be a cross-section of her intestines and something inside the lumen of the intestines marked as 'baby.' No

[4] Life's Connection, "Pregnancy Care and Support."
[5] Exhibit A, photographs of Ms. Cameron's Life Connection's ultrasound images.

> evidence that the image taken was of the patient's uterus. She reported that she felt reassured by this ultrasound and had scheduled a new OB appointment with another provider for 9/21/26.[6]

In other words, Life's Connection falsely marked an image of stool inside Ms. Cameron's intestines as her "baby."

Ms. Cameron's Care for All physician then performed a transabdominal and a transvaginal ultrasound and could not find a pregnancy in her uterus. The physician informed Ms. Cameron that she had "a pregnancy of unknown location, which means there are three possibilities. The first is that this is a normal intrauterine pregnancy that is too early to see on ultrasound. The second is that this is a miscarriage. The third is that this is an ectopic pregnancy."[7] Care for All took a blood sample to measure Ms. Cameron's serum hCG level to aid in determining whether her pregnancy was normal or abnormal, and the physician gave Ms. Cameron precautions about symptoms of ectopic pregnancy.

When Ms. Cameron returned for her second appointment with Care for All the next day, September 12, she reported worsening abdominal pain and learned that her serum hCG level was greater than 16,000. Together with the lack of visual evidence of an intrauterine pregnancy on ultrasound examination and her previous history of ectopic pregnancy, this data raised significant concern that her pregnancy was ectopic. The Care for All physician informed Ms. Cameron that her pregnancy was suspected to be ectopic and instructed her "to proceed directly to the emergency room for evaluation."[8] Ms. Cameron broke down crying. She was distressed to be experiencing a second ectopic pregnancy, fearful of losing her life, and distraught that she had been deceived by Life's Connection.

Ms. Cameron went straight to the emergency department at Froedtert Hospital as directed. By this point, she was in so much pain that she was "given morphine for symptom management" while being triaged but this did not produce "improvement in pain," which only "got worse during" her transvaginal ultrasound examination.[9] Ultrasonography "demonstrated a thick-walled cystic structure with peripheral vascularity in the right adnexa, consistent with a probable right tubal ectopic pregnancy, and no evidence of intrauterine pregnancy or significant free fluid. Laboratory studies showed a beta-hCG of 15,854 mIL/mL." Based on these findings, Ms. Cameron was diagnosed with a "[p]robable ectopic pregnancy in the right adnexa," and, due to the then-stage of the pregnancy, "urgent surgical intervention" was needed.[10] Removal of both fallopian tubes was recommended because Ms. Cameron's "history of contralateral ectopic" (an ectopic pregnancy occurring in the opposite fallopian tube)[11] significantly elevated her risk of another ectopic pregnancy. Because of how emergent her condition was, Ms. Cameron had little time to process and consider this life-changing decision before being taken to the operating room. Despite her

[6] This quote was taken verbatim from Ms. Cameron's medical records from Care for All.
[7] *Id.*
[8] *Id.*
[9] This quote was taken verbatim from Ms. Cameron's medical records from Froedtert Hospital.
[10] *Id.*
[11] *Id.*

desire to potentially have another child, Ms. Cameron consented to have both of her fallopian tubes removed because her misdiagnosis by Life's Connection left her terrified that another ectopic pregnancy would go undetected and kill her.

Ms. Cameron was placed on bed rest after her surgery and not cleared for regular physical activity until September 21. This prevented Ms. Cameron—who had lost her previous job at the beginning of September and was without funds for rent or utilities—from looking for work. Ms. Cameron is also traumatized and grieving her loss of fertility. Ms. Cameron can no longer achieve pregnancy without the aid of in-vitro fertilization—an expensive procedure that has no guarantee of success, is not covered by Medicaid, and which she cannot afford to pay out-of-pocket. A Froedtert provider noted that Ms. Cameron was "[t]earful when discussing her journey" at her post-operative follow-up appointment on September 21 and discussed her desire for a "perinatal psychology appt given trauma and grief associated with two ectopics and limited support."[12]

After Ms. Cameron's September 1 visit to Life's Connection, it only reached out to her one time, after she missed her September 15 appointment. Ms. Cameron told the worker on the phone that, after Life's Connection reassured her that her pregnancy was in her uterus, she subsequently learned it was ectopic and almost lost her life. In response, the worker told Ms. Cameron that Life's Connection would "pray for her."

Ectopic Pregnancy Is a Life-Threatening Condition that Requires Early Detection and Time-Sensitive Treatment

The false representations that Life's Connection makes regarding its ability to determine pregnancy location using "obstetrical ultrasounds" and the false reassurance it provided to Ms. Cameron that her pregnancy was in her uterus delayed detection of her ectopic pregnancy for ten days and nearly cost her life. This is not the first time that an anti-abortion pregnancy center has misled and jeopardized pregnant people suffering from this life-threatening condition by offering ultrasound readings by staff who lack adequate training and/or supervision to interpret ultrasounds. In 2025, Abundant Life Pregnancy Resource Center in Texas performed an ultrasound scan on a Texan and sent her home with the reassurance that her pregnancy was intrauterine and normal.[13] According to her medical records, this ultrasound reading was provided by a registered nurse prior to any physician review.[14] Days later, the woman required emergency surgery to treat the pregnancy—which was later discovered to be ectopic. Similarly, in 2022, a Massachusetts woman was enticed to obtain an ultrasound from Clearway Clinic, by advertising that misled her to believe that such services were provided by a physician, and was diagnosed with a viable pregnancy.[15] She only discovered her pregnancy was ectopic when it ruptured, "causing massive internal bleeding

[12] *Id.*
[13] Emily Brindley, "A Texas pregnancy center told her everything was fine. Three days later, she was in the ER," *The Dallas Morning News*, March 27, 2026, archived November 16, 2026, at https://web.archive.org/web/20261116231447/https://www.dallasnews.com/business/health-care/2026/03/27/a-crisis-pregnancy-center-told-a-texas-woman-that-her-pregnancy-was-normal-it-wasnt/.
[14] Brindley, "A Texas pregnancy center."
[15] Complaint at 3–4, *Jane Doe v. Clearway Clinic*, No. 2385CV00708 (Mass. Super. Ct. June 22, 2023).

and necessitating emergency surgery."[16] The woman's lawsuit against Clearway Clinic alleged that her ultrasound was performed by a registered nurse, who made the diagnosis of viable pregnancy "prior to any review of a medical doctor."[17]

These examples illustrate the dangers of false representations about ultrasound services offered by anti-abortion pregnancy centers, especially their ability to diagnose pregnancy viability and/or location. Ectopic pregnancy—the implantation of a fertilized egg in a location other than the uterus, e.g., in the fallopian tube—is a time-sensitive condition that can result in tubal rupture and life-threatening hemorrhage.[18] The risk of hemorrhage in untreated ectopic pregnancy is 50% or more, and ectopic pregnancy is the leading cause of maternal mortality in the first trimester.[19] In the United States, Black women are nearly 7 times as likely as White women to die from an ectopic pregnancy.[20] Ectopic pregnancies occur in about 2% of all pregnancies in the United States.[21] However, the risk of recurrence after a prior ectopic pregnancy can reach up to 27%.[22]

Most cases of tubal ectopic pregnancy that are detected early can be treated successfully either with minimally invasive surgery or with medical management using methotrexate.[23] However, a tubal ectopic pregnancy in an unstable patient is a medical emergency that requires prompt surgical intervention.[24] Ectopic pregnancies therefore must be terminated as soon as they are diagnosed.

Ultrasonography is an important tool for early detection of ectopic pregnancy. Except in the rare case of a heterotopic pregnancy (co-occurrence of an ectopic pregnancy with an intrauterine pregnancy), visualization of a definitive intrauterine pregnancy rules out ectopic pregnancy.[25] Definitive ultrasound evidence of an intrauterine pregnancy includes visualization of a gestational sac with a yolk sac or embryo.[26] A pregnant person without a definitive finding of an intrauterine or ectopic pregnancy on ultrasound examination has a "pregnancy of unknown location."[27] In these cases, efforts should be made to establish a definitive diagnosis by performing

[16] *Id.* at 5.
[17] *Id.* at 4.
[18] Courtney A. Schreiber and Sarita Sonalkar, "Tubal Ectopic Pregnancy," *New England Journal of Medicine* 392, no. 8 (2025): 798–805, https://www.nejm.org/doi/10.1056/NEJMcp2402787.
[19] *Id.*; Kellie Mullany, et al., "Overview of Ectopic Pregnancy Diagnosis, Management, and Innovation," *Women's Health* 19 (2023): 1–13, https://journals.sagepub.com/doi/10.1177/17455057231160349.
[20] Schreiber and Sonalkar, "Tubal Ectopic Pregnancy," 798.
[21] Schreiber and Sonalkar, "Tubal Ectopic Pregnancy," 798.
[22] Allison Petrini and Steven Spandorfer, "Recurrent Ectopic Pregnancy: Current Perspectives," *International Journal of Women's Health* 12 (2020): 597, archived November 16, 2026, at https://perma.cc/WJN8-9E6N.
[23] The American College of Obstetricians and Gynecologists ("ACOG"), "ACOG Practice Bulletin 193: Tubal Ectopic Pregnancy," *Obstetrics & Gynecology* 131, no. 3 (March 2018): e91, archived October 26, 2026, at https://perma.cc/8L93-SQPG (hereinafter "ACOG Practice Bulletin 193").
[24] ACOG Practice Bulletin 193, e91.
[25] ACOG Practice Bulletin 193, e92.
[26] ACOG Practice Bulletin 193, e92.
[27] ACOG Practice Bulletin 193, e93.

a pelvic exam[28] and by ordering a repeat transvaginal ultrasound examination, or serial measurement of hCG concentration, or both.[29]

Similar Ultrasound Advertising by Anti-Abortion Pregnancy Centers Throughout Wisconsin

There are approximately 55 anti-abortion pregnancy centers in Wisconsin.[30] At least 43 advertise ultrasound services.[31] Like Life's Connection, many of these entities advertise "limited ultrasounds" or "limited obstetrical ultrasounds" and claim that such ultrasounds will determine whether a pregnancy is "viable" and/or located in the uterus.[32] For example, Alliance Women's

[28] "*Ectopic Pregnancy: How is ectopic pregnancy diagnosed?,*" ACOG, archived November 16, 2026, at https://perma.cc/528H-HTU7; John R. Crochet, et al., "Does This Woman Have an Ectopic Pregnancy? The Rational Clinical Examination Systematic Review," *Journal of American Medicine* 16 (2013): 1722–29, https://pubmed.ncbi.nlm.nih.gov/23613077/.

[29] ACOG Practice Bulletin 193, e93.

[30] *See* "Interactive CPC Map (filtered for CPCs in Wisconsin)," Crisis Pregnancy Center Map, archived October 23, 2026, at https://perma.cc/P7X9-LV34; *see also* "Ultrasound – Our Locations: Fitchburg," First Care Clinic, archived October 22, 2026, at https://perma.cc/N2RS-ABMP; "Ultrasound Exams – Address: Marshfield," First Choice Pregnancy Resource Center, archived October 22, 2026, at https://perma.cc/XH7A-ACFZ; "Ultrasound – Vida Medical Clinic Hours and Locations: Green Bay Clinic," Vida Medical Clinic, archived October 22, 2026, at https://perma.cc/8MCC-G3MK.

[31] "Interactive CPC Map – Wisconsin (filtered for Wisconsin centers advertising "Limited Ultrasounds")," Crisis Pregnancy Center Map, archived October 23, 2026, at https://perma.cc/U2G9-5SU4; *see also* First Care Clinic, "Ultrasound – Our Locations"; First Choice Pregnancy Resource Center, "Ultrasound Exams"; Vida Medical Clinic, "Ultrasound – Green Bay Clinic."

[32] *See, e.g.*, "Medical Services," Abiding Care, archived October 22, 2026, at https://perma.cc/JJL5-6VMG; "Free Services," Alexandrina Pregnancy Resource Center, archived October 22, 2026, at https://perma.cc/8PEF-SR95; "Our Services," Alliance Women's Clinic, archived October 22, 2026, at https://perma.cc/E9WT-RUW8; "Ultrasound," Anchor of Hope, archived October 22, 2026, at https://perma.cc/AYJ5-AT2B; "Ultrasound," APS Medical, archived October 22, 2026, at https://perma.cc/8VG5-97SB; "Free Ultrasounds," CareNet Pregnancy Center of Milwaukee, archived October 22, 2026, at https://perma.cc/F4GF-LV8E; "Confirm Your Pregnancy," Choices Health Network, archived December 10, 2025, at https://web.archive.org/web/20251210183013/https://www.pregnancyoptionsonline.org/pregnancy-testing-and-ultrasounds-ladysmith-wi; "FAQs on Abortion," ClaraVita Medical, archived October 22, 2026, at https://perma.cc/4S2D-54ZQ; "Confirm Your Pregnancy," Clarity Clinic, archived October 22, 2026, at https://perma.cc/34XR-5UDB; "The Crossing Medical Clinic," The Crossing of Manitowoc County, archived October 22, 2026, at https://perma.cc/Q9C8-UZA6; "Ultrasound," First Care Clinic, archived October 22, 2026, at https://perma.cc/N2RS-ABMP; "Ultrasound Exams," First Choice Pregnancy Resource Center, archived October 22, 2026, at https://perma.cc/XH7A-ACFZ; "Ultrasound," Hope Life Center, archived October 22, 2026, at https://perma.cc/VJA6-3FWP; "Pregnancy Resources," Life Choices, archived October 22, 2026, at https://perma.cc/MY75-GWAY; "Pregnancy Care and Support," Life's Connection, archived October 22, 2026, at https://perma.cc/HFJ8-JMUJ; "What We Do," LifeSource Ministries, archived October 22, 2026, at https://perma.cc/8HP9-3QGL; "Free Ultrasound in Walworth County," New Day Women's Clinic, archived October 22, 2026, at https://perma.cc/FYE8-WZZP; "Free Limited Obstetrical Ultrasound," Options for Women, archived October 22, 2026, at https://perma.cc/6CGL-VSWA; "Limited OB Ultrasounds," Options for Women Menomonie, archived October 22, 2026, at https://perma.cc/9VAW-RSLE; "Pregnancy Services – Ultrasounds," Options on 8 Pregnancy Resource Center, archived October 22, 2026, at https://perma.cc/HN7L-VSNM; "Ultrasound Importance," Seed of Hope Center, archived October 22, 2026, at https://perma.cc/C6B3-32F6; "Ultrasound," Vida Medical Clinic, archived October 22, 2026, at https://perma.cc/8MCC-G3MK; "Limited Ultrasound," Willow Women's Clinic, archived October 22, 2026, at https://perma.cc/C7V9-GXFG; "Our Care," Women's Care Center,

Clinic advertises "limited ultrasounds" that "will give you valuable information including how far along you are (gestational age), **verify the location of your pregnancy (ruling out ectopic pregnancy)**, and determine whether or not there is cardiac activity (heart beat)."[33] CareNet Pregnancy Center of Milwaukee, ClaraVita Medical, Clarity Clinic, First Choice Pregnancy Resource Center, Hope Life Center, Options for Women Menomonie, Options on 8 Pregnancy Resource Center, Seed of Hope Center, and Willow Women's Clinic also claim that their ultrasounds confirm that the pregnancy is in the uterus and not ectopic.[34]

Despite widespread advertising of "limited obstetrical ultrasounds," anti-abortion pregnancy centers simultaneously claim that their services are not diagnostic or should not be relied upon as medical advice.[35] But use of ultrasound to determine pregnancy location is, by definition, diagnostic. The American Institute for Ultrasound in Medicine ("AIUM")—a medical association "dedicated to advancing the safe and effective use of ultrasound in medicine through professional and public education, research, development of guidelines, and accreditation"—states that "[o]bstetric ultrasound examinations should only be performed when there is a valid medical reason, and the lowest possible ultrasound exposures settings should be used to gain the necessary

archived October 22, 2026, at https://perma.cc/VK8A-D7BJ; "Pregnancy Services," Women's Support Center of Milwaukee, Inc., archived October 22, 2026, at https://perma.cc/83P8-KVPP.

[33] Alliance Women's Clinic, "Our Services."

[34] *See, e.g.*, CareNet Pregnancy Center of Milwaukee, "Free Ultrasounds"; ClaraVita Medical, "FAQs on Abortion"; Clarity Clinic, "Confirm Your Pregnancy"; First Choice Pregnancy Resource Center, "Ultrasound Exams"; Hope Life Center, "Ultrasound"; Options for Women Menomonie, "Limited OB Ultrasounds"; Options of 8 Pregnancy Resource Center, "Pregnancy Services– Ultrasounds"; Seed of Hope, "Ultrasound Importance"; Willow Women's Clinic, "Limited Ultrasound."

[35] *See, e.g.*, Anchor of Hope, "Ultrasound" ("The information on this website is provided for educational purposes only . . . The information provided should not be considered to be a diagnosis or used to treat any person in any way . . . Please always seek in-person professional medical advice for all issues pertaining to your health and well-being."); APS Medical, "Ultrasound" ("The information on this website is provided for educational purposes only . . . Please always seek in-person professional medical advice for all issues pertaining to your health and well-being."); "Services," EchoHealth, archived October 22, 2026, at https://perma.cc/UT4Z-XNK3 ("Information is provided as an educational service and should not be relied on as a substitute for professional and/or medical advice."); Life's Connection, "Pregnancy Care and Support" ("Please note: Our ultrasounds are not used to diagnose birth defects or complications, nor are they performed to determine the sex of the baby."); Options for Women Menomonie, "Limited OB Ultrasounds" ("This is not to offer a diagnosis for either mother or baby or to obtain gender."); Seed of Hope Center, "Ultrasound Importance" ("Our limited ultrasound examination is strictly for the purposes of confirming your pregnancy, detecting fetal cardiac activity, and estimating gestational age. We cannot diagnose any medical problems you may be experiencing, pregnancy-related or otherwise."); Vida Medical Clinic, "Ultrasound" ("The information provided should not be considered to be a diagnosis or used to treat any person in any way. Results may vary from person to person and there is no guarantee as to your individual experience with any of the above mentioned services, medications, or procedures. Please always seek in person professional medical advice for all issues pertaining to your health and wellbeing. Vida Medical Clinic is not suggesting medical treatment in any way. This information is purely educational."); Willow Women's Clinic, "Limited Ultrasound" ("Diagnostic ultrasound exams are used in early pregnancy to evaluate the health and development of the baby and monitor the progress of the pregnancy. While Willow Women's Center does not provide diagnostic ultrasounds, our exams . . . confirm the presence of a viable pregnancy in women who believe they would be at least 6-8 weeks pregnant[,] measure the size of the fetus and estimate the gestational age and due date[,] identify the presence of a heartbeat and assess the viability of the pregnancy [and] identify ectopic pregnancy, which can be life-threatening and typically requires immediate medical attention.").

diagnostic information."[36] Likewise, the American College of Obstetricians and Gynecologists ("ACOG") states that "[u]ltrasonography should only be performed when there is a valid medical indication" and that "casual use of ultrasonography, especially during pregnancy, should be avoided."[37] AIUM defines "limited obstetrical ultrasound examination" as "a focused obstetrical ultrasound examination performed to answer a specific clinical question or concern."[38] A limited obstetrical ultrasound should be performed under the order of an "appropriately licensed advanced clinical provider, physician, or other health care provider under that provider's direction."[39] "Indications for first-trimester ultrasound include . . . [c]onfirmation of the presence of intrauterine pregnancy."[40] Thus, the use of a limited obstetric ultrasound to determine pregnancy location *is* diagnostic, precisely because—as several anti-abortion pregnancy centers in Wisconsin acknowledge—this procedure is used to rule out ectopic pregnancy.

While some anti-abortion pregnancy centers claim their ultrasound services are offered by "licensed medical staff" or "licensed medical professionals,"[41] most do not identify the physician(s) responsible for supervising such services.[42] Even when entities have a verifiable medical director, such physicians often do not specialize in obstetrics and gynecology.[43]

Moreover, most anti-abortion pregnancy centers do not disclose whether a physician or appropriately qualified advanced clinical provider reviews ultrasound images before the pregnant

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[36] AIUM, "AIUM Practice Parameter for the Performance of Limited Obstetric Ultrasound Examinations by Advanced Clinical Providers," *Journal of Ultrasound in Medicine* 37, no.7 (2018): 1588, archived October 26, 2026, at https://perma.cc/W7ZX-SVFW.

[37] ACOG, "ACOG Practice Bulletin No. 175: Ultrasound in Pregnancy," *Obstetrics & Gynecology* 128, no. 6 (December 2016): e245–46, archived October 26, 2026, at https://perma.cc/2VHB-3ACT.

[38] AIUM, "Limited Obstetrical Ultrasound Examination," official statement, June 16, 2020, archived October 26, 2026, at https://perma.cc/K7NN-SFNS.

[39] AIUM, "Practice Parameter for the Performance of Limited Obstetric Ultrasound," 1589; *see also* AIUM, "Supervision and Interpretation of Ultrasound Examinations," official statement, April 20, 2026, archived October 26, 2026, at https://perma.cc/D2JB-5DUZ.

[40] AIUM, "Practice Parameter for the Performance of Limited Obstetric Ultrasound," 1589. A limited obstetric ultrasound examination in the first trimester includes evaluation of the presence, size, location, and number of gestational sac(s). *Id.* at 1588. The gestational sac is examined for the presence of a yolk sac and embryo/fetus; when an embryo/fetus is detected, the crown-rump length should be measured and cardiac activity recorded. *Id.* The uterus, cervix, adnexa, and cul-de-sac region should be examined. *Id.* In the first trimester, a transvaginal ultrasound is the preferred modality; for patients under 8 weeks of gestation, with higher BMIs, prior cesarean section scarring, increased suprapubic adiposity depth, a transvaginal approach offers better visualization of pregnancy landmarks. Venkatesh A. Murugan, et al., "Role of ultrasound in the evaluation of first-trimester pregnancies in the acute setting," *Ultrasonography* 39, no. 2 (2020): 178, https://pubmed.ncbi.nlm.nih.gov/32036643/; Holly A. Rankin and Mellisa C. Matulich, "First trimester obstetric ultrasound," *Contemporary OB/GYN*, November 18, 2025, archived November 16, 2026, at https://perma.cc/J453-LDPG.

[41] *See, e.g.*, Abiding Care; Anchor of Hope; Hope Life Center; Vida Medical Clinic.

[42] Reproductive Health and Freedom Watch, "Is there a Doctor in the House? A National Analysis of Medical Service Oversight at Unregulated Pregnancy Clinics," memorandum to Interested Parties, archived October 23, 2026, at https://perma.cc/3RC9-K56T.

[43] *Id.* (Reproductive Health and Freedom Watch found that fewer than half of identified medical directors specialize in obstetrics and gynecology. The identified medical directors included specialists in psychiatry, anesthesiology, ophthalmology, and other disciplines.).

person is informed whether the pregnancy is viable and/or in the uterus,[44] or interprets the ultrasound in a timely manner. Many anti-abortion pregnancy centers in Wisconsin do not disclose the qualifications of the volunteers or staff who perform and interpret limited obstetric ultrasounds.[45] Others claim that their ultrasounds are performed by a "registered nurse," or a "nurse sonographer," but do not disclose whether and on what timeline images are interpreted by a physician.[46] According to the AIUM's guidance on minimum standards for ultrasound provision, ultrasounds should be interpreted by a physician "within 24 hours . . . or, for nonemergency cases, by the next business day."[47] Heartbeat International—a network of anti-abortion pregnancy centers to which Life's Connection belongs[48]—acknowledges that this 24-hour timeframe is the "national practice standard" set by AIUM and that "[w]hile some Medical Directors feel it would be consistent with the highest level of care which we strive for . . . other Medical Directors who have discussed the issue feel strongly that we do not need to comply with the 24 hour mandate and that it would be impossible for most centers to do so."[49]

In addition to claiming that their ultrasounds will determine pregnancy viability and location, some entities insinuate that their services meet Wisconsin's pre-abortion legal requirements.[50] For instance, Care Net Pregnancy Center of Milwaukee's website states:

> Do I need an ultrasound before making a pregnancy decision?
>
> Yes. An ultrasound offers essential information about gestational age and fetal viability which can guarantee you the most informed decision possible.

[44] *See* AIUM, "Practice Parameter for the Performance of Limited Obstetric Ultrasound," 1589; AIUM, "Supervision and Interpretation of Ultrasound Examinations" ("Ultrasounds shall be supervised and interpreted by a licensed medical provider who may practice independently and meets the training guidelines in the specific area of sonography.").

[45] *See, e.g.*, Hope Life Center, "Ultrasound" ("Licensed medical professionals are available to discuss ALL your options and provide you with accurate information so you can feel empowered to make an educated and informed decision."); LifeSource Ministries, "What We Do" ("Our nurses perform limited obstetric ultrasounds to safeguard our patients' health and accurately confirm a pregnancy."); Care Net Pregnancy Center of Milwaukee, "Free Ultrasounds" ("Care Net Pregnancy Center of Milwaukee, or any clinic, will want to conduct an ultrasound early on in your pregnancy in order to confirm your pregnancy[,] estimate gestational age [and] determine pregnancy viability and location.").

[46] Of the 43 anti-abortion pregnancy centers that advertise ultrasound services on their websites, only four specify that ultrasounds are interpreted by a physician. *See, e.g.*, Anchor of Hope, "Ultrasound" ("Your ultrasound will be read by a doctor who will confirm your pregnancy."); APS Medical, "Ultrasound" ("All exams are also read and interpreted by a licensed OB/GYN."); First Care Clinic, "Ultrasound" ("A physician will compare the ultrasound measurements to your estimated dating from your last menstrual period and determine how many weeks pregnant you are."); New Day Women's Clinic, "Free Ultrasound in Walworth County ("All ultrasounds are provided at no cost in Delavan and Whitewater, performed confidentially by a nurse sonographer or RDMS, and reviewed by our Medical Director.").

[47] AIUM, "AIUM Practice Parameter for Documentation of an Ultrasound Examination," *Journal of Ultrasound in Medicine* 39, no. 1 (2020): E3, archived October 23, 2026, at https://perma.cc/HB5L-LVJ5.

[48] "Worldwide Directory of Pregnancy Help: Life's Connection," Heartbeat International, archived October 23, 2026, at https://perma.cc/39HK-YK5B.

[49] Heartbeat International, "Worldwide Directory."

[50] *See* Wis. Stat. § 253.10(3g) (2023–24).

Ultrasounds are not only legally required in Wisconsin if you are considering an abortion, but they are also the only way to consider if there is an ectopic pregnancy.[51]

However, these entities do *not* provide or complete the consent forms that are required before an abortion can be legally provided in Wisconsin.[52]

Wisconsin's Support of Anti-Abortion Pregnancy Centers

Despite the widespread deceptive practices described above, Wisconsin refers pregnant people to anti-abortion pregnancy centers—including Life's Connection—on its WellBadger Resource Center.[53] Wisconsin also facilitates these entities' fundraising through the "Choose Life" license plate program. Choose Life Wisconsin was awarded authorized special group status in 2016 for the purpose of requesting a specialty license plate from the Department of Transportation.[54] The Department of Transportation collects an annual $25 tax-deductible donation from "Choose Life" license plate holders, "which the state will send to Choose Life Wisconsin," which "then distribute[s] the funds" to anti-abortion pregnancy centers[55]—including Life's Connection[56]—as grants.

LEGAL VIOLATIONS

False Representations and Unfair Trade Practices

Investigating and taking enforcement action against anti-abortion pregnancy centers that engage in ultrasound practices like those of Life's Connection is consistent with the authority of the Wisconsin Department of Justice ("DOJ") and Wisconsin Department of Agriculture, Trade, and Consumer Protection ("DATCP"), their demonstrated commitment to combating deceptive and unfair trade practices in Wisconsin, and prior investigations and enforcement actions taken by state Attorneys General against deceptive and unfair practices by other anti-abortion pregnancy centers.[57]

Section 100.18 of Wisconsin's Deceptive Trade Practices Act ("DTPA") prohibits "untrue, deceptive or misleading" statements in an "advertisement, announcement, statement or

[51] CareNet Pregnancy Center of Milwaukee, "Free Ultrasounds."
[52] *See* Wis. Stat. § 253.10(3) (2023–24).
[53] "Pregnancy Resource Center (Abortion Alternative): Available Services," WellBadger Resource Center, archived October 23, 2026, at https://perma.cc/H6J7-B3JG.
[54] "Choose Life Plates Coming to Wisconsin!," Wisconsin Family Council, archived October 23, 2026, at https://perma.cc/T878-GBSH.
[55] Wisconsin Family Council, "Choose Life Plates."
[56] "Wisconsin's Pregnancy Resource Centers," Choose Life Wisconsin, archived October 23, 2026, at https://perma.cc/32BC-KPX3; see also "Photo No. 2," Choose Life Wisconsin, archived October 23, 2026, at https://perma.cc/X8AQ-RRNU.
[57] *See, e.g.*, *Carr v. Axelrod*, 798 F. Supp. 168 (S.D.N.Y. 1992), *aff'd*, 996 F.2d 302 (2d Cir. 1993); *Mother & Unborn Baby Care of N. Texas, Inc. v. State*, 749 S.W.2d 533 (Tex. App. 1988), *writ denied* (Nov. 16, 1988); *Fargo Women's Health Org. v. Larson*, 391 N.W.2d 627 (N.D. 1986).

representation of any kind to the public."[58] The broad scope and protective purpose of this statute is to prevent certain activities deemed harmful to Wisconsinites' social and economic wellbeing.[59] The DOJ, after consulting with the DATCP, is authorized to commence an action in the name of the state to restrain violations of Section 100.18 by injunction[60] and indeed, has repeatedly brought enforcement actions under Section 100.18 to protect Wisconsinites from deceptive practices.[61] In an action to enforce Section 100.18, the State need only show that there was an advertisement or announcement and that it contained an untrue, deceptive, or misleading statement.[62] Under the Wisconsin's DTPA, "the alleged misrepresentation need not be 'literally false'"; it is sufficient that the "statement is likely to mislead a reasonable consumer, even if the statement is literally true."[63]

Wisconsin's DTPA also prohibits unfair methods of competition and unfair trade practices in business under Section 100.20.[64] The DOJ is authorized to file complaints with the DATCP alleging a person is engaging in unfair trade practices in violation of this statute.[65] Importantly, Section 100.20 authorizes the DATCP to issue special orders enjoining persons from engaging in unfair trade practices and requiring such persons to employ a trade practice the DATCP deems to be fair.[66] The DATCP is also authorized to "commence an action in circuit court" to restrain by injunction any violation of the orders issued under Section 100.20.[67] Under Section 100.20, the DATCP is "entitled to act to protect those, other than business competitors, injured or affected by unfairness in trade practices."[68] "Schemes which can cause the loss of money and the victimization of third persons clearly fall within the term 'unfair trade practices'" and within the DATCP's regulatory authority.[69]

By advertising "limited obstetrical ultrasounds" that can "[d]etermine viability" including whether "the fetus is located within the uterus and a heartbeat is present, as determined by a trained medical professional,"[70] Life's Connection makes affirmative representations that may lead Wisconsinites—and did, in fact, lead Ms. Cameron—to believe that their services are diagnostic and provided by a healthcare professional who is trained and qualified to make medical diagnoses. By advertising that their ultrasound scans will determine whether a pregnancy is developing in the uterus, Life's Connection clearly implies it will detect and warn pregnant people if their pregnancy

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[58] Wis. Stat. § 100.18(1) (2023–24).
[59] *Hinrichs v. DOW Chem. Co.*, 2020 WI 2, ¶ 82, 389 Wis. 2d 669, 937 N.W.2d 37 (citing *Tim Torres Enters., Inc. v. Linscott*, 142 Wis. 2d 56, 72, 416 N.W.2d 670, 676 (Ct. App. 1987)).
[60] Wis. Stat. § 100.18(11)(d) (2023–24).
[61] *See, e.g.*, *State v. Abbott Lab'ys*, 2013 WI App 31, 346 Wis. 2d 565, 829 N.W.2d 753; *State v. Excel Mgmt. Servs., Inc.*, 111 Wis. 2d 479, 331 N.W.2d 312 (1983); *State v. Advance Mktg. Consultants, Inc.*, 66 Wis. 2d 706, 225 N.W.2d 887 (1975).
[62] *State v. Talyansky*, 2023 WI App 42, ¶ 41, 409 Wis. 2d 57, 995 N.W.2d 277; *see also State v. Am. TV & Appliance of Madison, Inc.*, 146 Wis. 2d 292, 301, 430 N.W.2d 709, 712 (1988).
[63] *Bakery Bling v. Matrix Packaging Mach., LLC*, 685 F. Supp. 3d 718, 751 (E.D. Wis. 2023) (quoting *Weaver v. Champion Petfoods USA Inc.*, 3 F.4th 927, 934 (7th Cir. 2021)).
[64] Wis. Stat. § 100.20(1) (2023–24).
[65] Wis. Stat. § 100.20(4) (2023–24).
[66] Wis. Stat. § 100.20(3) (2023–24).
[67] Wis. Stat. § 100.20(6) (2023–24).
[68] *HM Distribs. of Milwaukee, Inc. v. Dep't of Agric.*, 55 Wis. 2d 261, 267, 198 N.W.2d 598, 602 (1972).
[69] *Id.* (quoting the circuit court's decision).
[70] Life's Connection, "Pregnancy Care and Support."

is *not* developing inside the uterus, as occurs in ectopic pregnancies. Other anti-abortion pregnancy centers are even more explicit in their claims that their ultrasound services will rule out ectopic pregnancy.[71]

These advertisements induce pregnant Wisconsinites like Ms. Cameron to visit anti-abortion pregnancy centers and undergo ultrasound examinations on the reasonable belief that they are diagnostic and will provide reliable information about pregnancy location. If such ultrasound examinations are not performed and interpreted by appropriately trained and qualified professionals, as well as conducted in accordance with medical standards, such advertising may constitute a false representation and/or unfair trade practice. In addition, to the extent that anti-abortion pregnancy centers imply they will fulfill Wisconsin's pre-abortion legal requirements but do not do so, such conduct may also constitute a false representation and/or unfair trade practice.

In addition, when Life's Connection then failed to detect and warn Ms. Cameron that there was no pregnancy insider her uterus and instead informed her verbally and in writing that images of stool inside her small intestine depicted her "baby" inside her uterus, these false representations caused her to forego seeking further evaluation for ten days. By giving pregnant people false reassurance based on misinterpreted ultrasound images, Life's Connection—and other anti-abortion pregnancy centers engaging in similar conduct—induce the public to reasonably believe that such information is an accurate medical diagnosis and forego seeking medical care.[72] In situations—like Ms. Cameron's—where the pregnancy is ectopic, such practices can have life-threatening consequences. As discussed *supra* p. 6, time is of the essence in treating an ectopic pregnancy because the risk of life-threatening rupture increases every day as the pregnancy grows.

Finally, the labeling of ultrasound images (in Ms. Cameron's case, ones that do not even depict a pregnancy) as "Baby!" with text like "Hi Mom!" can be emotionally manipulative if the pregnant person does not wish to continue the pregnancy, or even traumatizing, if the pregnant person is experiencing a miscarriage or ectopic pregnancy. Thus, the use of such "high pressure" tactics to attempt to coerce visitors into continuing their pregnancies and discourage them from seeking abortions may also constitute an unfair trade practice.[73]

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[71] *See supra* note 34 (collecting websites of anti-abortion pregnancy centers claiming that their ultrasounds confirm a pregnancy is in the uterus and not ectopic); *see also* CareNet Pregnancy Center of Milwaukee, "Free Ultrasounds"; ClaraVita Medical, "FAQs on Abortion"; Clarity Clinic, "Confirm Your Pregnancy"; First Choice Pregnancy Resource Center, "Ultrasound Exams"; Hope Life Center, "Ultrasound"; Options for Women Menomonie, "Limited OB Ultrasounds"; Options of 8 Pregnancy Resource Center, "Pregnancy Services– Ultrasounds"; Seed of Hope, "Ultrasound Importance"; Willow Women's Clinic, "Limited Ultrasound."

[72] ACOG, "Practice Bulletin 175: Ultrasound in Pregnancy," e247 ("[N]onmedical ultrasonography may falsely reassure pregnant women who may incorrectly believe that the ultrasound imaging is diagnostic.").

[73] *Reusch v. Roob*, 2000 WI App 76, ¶¶ 24, 30, 234 Wis. 2d 270, 610 N.W.2d 168 (affirming finding that a photographer's high-pressure tactics during an in-person session were unconscionable and constituted an unfair trade practice).

Deceptive Fundraising Practices

Subchapter II of chapter 202 governs the solicitation of funds for charitable purposes and prohibits charitable organizations,[74] fund-raising counsel, or professional fund-raisers from using "an unfair or deceptive act or practice," in addition to other enumerated prohibited acts.[75] Subchapter II authorizes the DOJ to "bring an action to prosecute a violation of this subchapter or the rules promulgated under this subchapter, including an action for temporary or permanent injunction."[76]

Life's Connection advertises to Wisconsin donors that their donations support an "ultrasound program" that "provide[s] lifesaving ultrasound." [77] But in Ms. Cameron's case, far from being "lifesaving," the ultrasound examination performed by Life's Connection put her life in grave danger. Investigating Life's Connection's for deceptive fundraising practices is consistent with the Wisconsin DOJ's authority and commitment to protecting Wisconsin donors from deceptive tactics in fundraising.[78]

Unlicensed Practice of Medicine

If Life's Connection and/or other anti-abortion pregnancy centers are offering ultrasounds performed by individuals who lack adequate training, qualifications, and/or medical supervision, such practices may violate Wisconsin law prohibiting the unauthorized practice of medicine.

The practice of medicine is defined to mean:

> (a) To examine into the fact, condition or cause of human health or disease, or to treat, operate, prescribe or advise for the same, by any means or instrumentality.
>
> (b) To apply principles or techniques of medical sciences in the diagnosis or prevention of any of the conditions described in par. (a) and in sub. (2).
>
> (c) To penetrate, pierce or sever the tissues of a human being.
>
> (d) To offer, undertake, attempt or do or hold oneself out in any manner as able to do any of the acts described in this subsection.[79]

[74] A charitable organization includes a 501(c)(3) organization that is exempt from taxation. Wis. Stat. § 202.11(1)(a) (2023–24). Life's Connection is registered as a 501(c)(3) per their 990 filing.
[75] Wis. Stat. § 202.16(1)(a) (2023–24).
[76] Wis. Stat. § 202.18(1)(a) (2025).
[77] *See* "Help our Mission," Life's Connection, archived October 23, 2026, at https://perma.cc/K3EA-GPHJ.
[78] The Wisconsin DOJ, alongside the Federal Trade Commission and other states, has challenged the deceptive practices of two nonprofit organizations under subchapter II of chapter 202. *See* Wis. DOJ, "Attorney General Kaul Joins FTC in Taking Action Against Allegedly Fraudulent Charity for Deceiving Donors," press release, archived October 23, 2026, at https://perma.cc/5FG2-C7DA; Wis. DOJ, "WI DOJ, FTC and Coalition Act to Stop Allegedly Deceptive Cancer Charity Fundraising Scheme," press release, archived October 23, 2026, at https://perma.cc/XL6P-AHSK.
[79] Wis. Stat. § 448.01(9) (2023–24).

Anyone who performs such a task without a medical license is practicing medicine unlawfully.[80] Practicing medicine without a license, attempting to do so, or making a representation as authorized to do so can be punished with a fine of up to $10,000, a prison term of up to nine months or both.[81]

These statutes "insur[e] that those licensed to practice medicine in the State of Wisconsin are competent to do so under standards which have become accepted in the profession" and prohibit unauthorized practice of medicine to "safeguard[] the life, health, and property" of Wisconsinites.[82] Other states have investigated the practice of medicine without a license by staff at anti-abortion pregnancy centers. The Florida Department of Health investigated the Women's Help Center in Jacksonville, Florida, following allegations that a staff member was engaging in unlicensed practice of medicine.[83] That staff member reportedly "conducted an ultrasound examination to multiple female clients" and "provided medical evaluations [and] diagnoses," including confirming pregnancy and whether it was intrauterine, without "consult[ing] with a medical doctor prior to giving a diagnosis."[84] The Florida Department of Health issued an order to cease and desist.[85]

The Life's Connection staff member who performed Ms. Cameron's ultrasound and informed her that her pregnancy was in her uterus did not identify herself as a physician or advanced practice registered nurse ("APRN"). If the staff member was not a licensed healthcare professional or she lacked the competence to perform a limited obstetrical ultrasound, and/or if diagnosing pregnancy location based on interpretation of ultrasound images was not within her scope of practice, she may have committed unauthorized practice of medicine.[86] Medical diagnoses based on interpretation of ultrasound images are not within the scope of practice for registered nurses ("RNs") or medical imaging professionals. With adequate training and/or certification, such professionals may be competent to perform ultrasound examinations under the order of licensed practitioners, but RNs and medical imaging professionals may not independently interpret ultrasound images.[87] Referring to and marking images of Ms. Cameron's small intestine

[80] *See* Wis. Stat. § 448.03(1)(a) (2023–24).
[81] Wis. Stat. § 448.09(1) (2023–24).
[82] *Gilbert v. State, Med. Examining Bd.*, 119 Wis. 2d 168, 188–89, 349 N.W.2d 68, 77 (1984).
[83] State of Florida Department of Health, "Unlicensed Activity Investigative Report Subject: Pat Henderson," February 28, 2018, 1, archived October 26, 2026, at https://perma.cc/XX66-Y4MV.
[84] State of Florida Department of Health, "Unlicensed Activity Investigative Report," 1, 3.
[85] State of Florida Department of Health, "Unlicensed Activity Investigative Report," 5.
[86] Wis. Stat. §§ 441.001(3n), (3r) (2025); Wis. Stat. § 448.03(1)(a) (2023–24); Wis. Admin. Code N §§ 6.02(10m), 6.03(2)(a), (d) (2025); *see also* AIUM, "Practice Parameter for the Performance of Limited Obstetric Ultrasound," 1589; AIUM, "Supervision and Interpretation of Ultrasound Examinations"; American Society of Radiologic Technologists, "The ASRT Practice Standards for Medical Imaging and Radiation Therapy" (June 28, 2026), at 50, archived November 16, 2026, at https://perma.cc/EV6E-LCXF.
[87] The State Board of Nursing limits RNs' diagnostic authority to "nursing diagnosis," which does not include the diagnosis of illness or the management of pregnancy. Wis. Admin. Code N §§ 6.02(3), (8), 6.03(1)(a) (2025); *see also* Wis. Stat. § 441.001(3c) (2025) (defining the practice of a certified nurse-midwife to include "practice in the management of women's health care" and "pregnancy"), (3n) (defining the practice of a clinical nurse specialist to include "the diagnosis and treatment of illness"), (3r) (defining the practice of a nurse practitioner to include "diagnosing . . . illnesses"). Any acts by an RN beyond general nursing procedures must be performed under the "protocols or written or verbal orders" and supervision of a provider "legally authorized to delegate acts within the

as her "baby" is incompetent conduct that suggests the Life's Connection staff member may lack the education, training, or experience necessary to perform a limited obstetrical ultrasound in early pregnancy, which involves examining the uterus—not the intestine—for a gestational sac that contains a yolk sac and embryo.[88] Regardless, any assurance that Ms. Cameron's pregnancy was in her uterus provided without prior review of her ultrasound images by a physician or adequately qualified APRN may exceed the staff member's scope of practice. Likewise, if other anti-abortion pregnancy centers in Wisconsin permit RNs, medical imaging professionals, or unlicensed staff to tell visitors whether their pregnancies are viable and/or in the uterus during ultrasound scans, without prior review of images by a physician or adequately qualified APRN, they may also be engaged in unlicensed practice of medicine.

CONCLUSION

The Center for Reproductive Rights respectfully requests that the office of the Attorney General, the Department of Agriculture, Trade and Consumer Protection, Department of Financial Institutions, and the Medical Examining Board investigate Life's Connection and entities engaged in similar ultrasound practices in Wisconsin to determine whether they are violating Wisconsin's prohibitions on false representations, unfair trade practices, deceptive fundraising practices, and/or unauthorized practice of medicine. In addition, the Center for Reproductive Rights respectfully requests that your offices pursue injunctive and other appropriate relief for any violations of Wisconsin law.

Thank you for your prompt attention to this important matter.

Sincerely,

/s/ Alice Wang_____

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scope of their practice," such as a physician or APRN. Wis. Admin. Code N §§ 6.02(10m), 6.03(2)(a), (d) (2025). Moreover, the RN must be "competent to perform" the delegated act "based on his or her nursing education, training, or experience." Wis. Admin. Code N § 6.03(2)(b) (2025); *see also* Wis. Stat. § 441.001(3n), (3r) (2025); Wis. Stat. § 448.03(1)(a) (2023–24); AIUM, "Practice Parameter for the Performance of Limited Obstetric Ultrasound," 1589; AIUM, "Supervision and Interpretation of Ultrasound Examinations." Likewise, medical imaging professionals who are appropriately qualified may perform sonographic imaging procedures but must do so "at the request of and for interpretation by a licensed practitioner." American Society of Radiologic Technologists, "The ASRT Practice Standards for Medical Imaging and Radiation Therapy," 4; *see also supra* p. 9.

[88] AIUM, "Practice Parameter for the Performance of Limited Obstetric Ultrasound," 1588; ACOG Practice Bulletin 193, e92; *see also supra* p. 6.

Exhibit A


Cameron, Codyone [redacted]
VS8203558-26-09-01-1 GA=05w5d
LIFES CONNECTION
TIs <0.1
TIb <0.1
MI 1.1
09/01/2026
1:58:33 PM
RAB6-RS
22Hz/11.8cm
41°/1.0
1 Trim./OB
HI H PI 6.70 - 3.80
AO 98%
Gn 1
C6/M7
FF3/E2
SRI II 1/CRI 3
Voluson S8
BABY!
HI DAD!


LIFE'S CONNECTION
CARING • SHARING • HOPING • HEALING
Warning Signs in Pregnancy
Signs of Preterm Labor (B
Pelvis or lower abdomina
LIFES CONNECTION
Cameron, Codyone [redacted]
VS8203558-26-09-01-1 GA=05w5d
09/01/2026
1:54:27 PM
RAB6-RS
22Hz/11.8cm
LITTLE BEAN!
HI MOM!


LIFE'S CONNECTION
CARING · SHARING · HOPING · HEALING
Warning Signs in Pregnancy
Signs of Preterm Labor (Before
Cameron, Codyone [redacted]
VS8203558-26-09-01-1 GA=05w5d
LIFES CONNECTION
TIs <0.1
TIb <0.1
MI 1.1
09/01/2026
1:54:27 PM
RAB6-RS
22Hz/11.8cm
41°/1.0
1 Trim./OB
HI H PI 6.70 - 3.80
AO 98%
Gn 1
C6/M7
FF3/E2
BABY!
HI MOM!