



STUDENTS
FOR LIFE
OF AMERICA



STUDENTS
FOR LIFE®
ACTION

October 20, 2025

The Honorable Kelly Loeffler
Administrator
U.S. Small Business Administration
409 3rd Street, SW
Washington, D.C. 20416

Dear Administrator Loeffler,

Doing business with the United States of America represents an honor, a privilege, and a responsibility for any and all chosen. The Trump Administration has been revolutionary in ending abuse and fraud from individuals and companies, as well as ending the heavy weight of financial responsibility on this generation and for many to come. It is the right and duty of this and all administrations to ensure that the resources delegated reach their intended targets, for the purpose for which they were sent. In light of that need, **the Pro-Life Generation asks the Small Business Administration (SBA) to begin the investigation to debar Planned Parenthood** so that the U.S. will no longer engage in commerce with a disreputable and negligent vendor undeserving of any taxpayer support for its operation.

The reasons for this review are many.

We echo the concerns raised by U.S. Senators Rand Paul and Joni Ernst in a letter to you earlier this year, drawing your attention ¹[“to the unlawful participation of the Planned Parenthood Federation of America \(PPFA\) in the Paycheck Protection Program \(PPP\).”](#)

PPFA was notified in 2020 that they had “wrongfully applied for 38 PPP loans totaling more than \$80 million dollars ... Despite this determination, the SBA, under the Biden Administration, approved further loans in 2021 totaling nearly \$40 million. Further, the SBA then allowed at least 34 Planned Parenthood PPP loans to be forgiven.” Those funds together mean that approximately \$120 million was stripped away from qualified businesses in need. [The letter from Senators Paul and Ernst can be found here.](#)

“Borrowers who made incorrect or false eligibility certifications on their PPP application are subject to severe penalties. For this reason, we respectfully request that you investigate whether any PPFA affiliates made a knowingly false certification on their applications for PPP loans, and upon findings of false certification, pursue all appropriate penalties for any unlawful participation in the program,” write Paul and Ernst.

¹ https://www.ernst.senate.gov/imo/media/doc/chair_ernst_hsgac_chair_paul_letter_to_sba_ppp_ppfa.pdf

This should be reason enough to begin the process of debarment. In fact, the use of the tool for bad actors includes some surprising sources.

[In a 2022 letter](#) to Attorney General Merrick Garland and Deputy Attorney General Lisa Monaco, Sens. Elizabeth Warren, D-Mass., and Ben Ray Lujan, D-N.M., demanded that the Department of Justice (DOJ) get busy with debarment activities.

They wrote: “Agencies possess broad authority to suspend and debar individuals and entities that engage in criminal conduct or pose a risk to the public interest. The Federal Acquisition Regulation (FAR) permits an agency to debar an entity if it is convicted of or receives a civil judgment for ‘any ... offense indicating a lack of business integrity or business honesty.’ An agency can also debar an entity based on just a ‘preponderance of the evidence’ for ‘any other cause so serious or compelling a nature that it affects the present responsibility of the contractor or subcontractor.’ Before or while a debarment is being considered, agencies can suspend a contractor if there is ‘adequate evidence’ that suspension is necessary to protect the government’s interests. Agencies also have a wide latitude to link contracting companies to the misconduct of any of their employees – including top company executives – as long as the misconduct ‘occurred in connection with the individual’s performance of duties for or on behalf of the contractor, or with the contractor’s knowledge, approval, or acquiescence.’”

² [The letter is a template for the authority](#) of a Trump-Vance Administration and your office to act, given the misdeeds of *Planned Parenthood*.

AN OVERVIEW OF THE PROCESS:

The *U.S. General Services Administration* (GAO) [³outlines how this process takes place](#) to protect the taxpayer from fraud, waste, and abuse.

The GAO reports the following as causes for Suspension or Debarment.

- + Commission of fraud, embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, tax evasion, violating Federal criminal laws, receiving stolen property, an unfair trade practice
- + Violation of antitrust statutes
- + Willful, or a history of, failure to perform
- + Violation of the Drug-Free Workplace Act
- + Delinquent Federal taxes (more than \$3,000)
- + Knowing failure to disclose violation of criminal law
- + Any other cause that affects present responsibility

² <https://www.warren.senate.gov/imo/media/doc/2022.08.10%20Letter%20to%20DOJ%20on%20use%20of%20suspension%20and%20debarment%20authority.pdf>

³ <https://www.gsa.gov/policy-regulations/policy/acquisition-policy/office-of-acquisition-policy/gsa-acq-policy-integrity-workforce/suspension-debarment-and-agency-protests/suspension-debarment-faq>

Students for Life of America (SFLA) has called for the use of this process against *Planned Parenthood* since the first Trump Administration. The size of the federal contribution alone merits review.

The federal government is supporting the business of abortion by underwriting personnel, infrastructure, and fixed costs like rent and utilities, ⁴[as nearly 40%](#) of *Planned Parenthood*'s income comes from federal tax support. President Trump ran directly on a campaign of limiting federal engagement in abortion, meaning that such a significant federal contribution is in opposition to our President's stated agenda.

As *Planned Parenthood* is the nation's ⁵[largest abortion vendors](#) and now ⁶[one of the largest distributors](#) of wrong-sex, ⁷[sterilizing hormones](#), their business model itself is reason enough to cut them off.

In fact, South Carolina did just that, and ⁸[the Supreme Court gave their support](#).

In looking at reasons to be concerned about *Planned Parenthood*'s presence on the public payroll, we show a number of causes that should trigger the necessary investigation. This is an overdue job review to determine whether *Planned Parenthood* should be fired.

REPORTED PROBLEMS & CONTROVERSIES INCLUDE:

+ REPORTS OF ILLEGAL TRAFFICKING IN BABY BODY PARTS: In 2016, hearings took place after Daleiden's bombshell reports on *Planned Parenthood*'s allegedly illegal baby body part trafficking. Sen. Marsha Blackburn, while in the U.S. House, chaired the House Energy and Commerce Committee's Select Investigative Panel on *Planned Parenthood* -- the Select Investigative Panel on Infant Lives. Those troubling reports, added ⁹[to ongoing revelations](#) as reported in the ¹⁰[New York Post](#), make this an area of investigation.

National Review in 2016, in a piece titled, ¹¹[House Panel Releases Full List of Criminal Referrals in Planned Parenthood Investigation](#), reported: "The panel was established last fall in the wake of the *Center for Medical Progress*' undercover videos, which revealed evidence of extensive wrongdoing on the part of *Planned Parenthood* affiliates and associated organizations.

⁴ <https://studentsforlife.org/2025/05/12/planned-parenthood-calls-itself-a-force-for-hope-brags-about-the-forced-funding-of-abortion-in-new-2023-2024-annual-report-abortions-planned-par/>

⁵ <https://www.politifact.com/factchecks/2017/may/15/glenn-grothman/glenn-grothman-says-planned-parenthood-leading-abo/>

⁶ <https://www.help.senate.gov/rep/newsroom/press/ranking-member-cassidy-calls-out-planned-parenthoods-opaque-reporting-and-questions-its-use-of-taxpayer-dollars-to-fund-gender-transition-services>

⁷ <https://www.americafirstpolicy.com/issues/state-reforms-to-protect-children-from-harmful-and-irreversible-transgender-medical-procedures>

⁸ https://www.supremecourt.gov/opinions/24pdf/23-1275_e2pg.pdf

⁹ <https://thefederalist.com/2024/08/09/pull-off-a-leg-or-two-planned-parenthood-staff-discuss-harvesting-baby-parts-in-unsealed-footage/>

¹⁰ <https://nypost.com/2024/11/21/us-news/planned-parenthoods-emails-negotiating-for-fetuses-exposed/>

¹¹ <https://www.nationalreview.com/corner/planned-parenthood-investigation-house-panel-issues-15-criminal-referrals/>

Since that time, the panel has issued ¹²[15 criminal and regulatory referrals](https://energycommerce.house.gov/news-center/letters/select-investigative-panel-criminal-and-regulatory-referrals) to federal, state, and local authorities, advising further investigation into the practices of these organizations, as well as possible prosecution if additional evidence of illegal activity is found.

“Over the course of the investigation, the bipartisan panel has discovered increasingly damning evidence of the fact that abortion clinics and tissue-procurement organizations (TPOs) — groups such as *StemExpress* and *Advanced Bioscience Resources*, which partner with *Planned Parenthood* and other clinics to obtain fetal tissue and resell it at a profit to research firms — have repeatedly conspired to violate a federal statute making it a felony to profit from the sale of human fetal tissue.”

+ INVESTIGATION OF MEDICARE/MEDICAID FRAUD: Already, significant concern exists with *Planned Parenthood*’s financials when you consider an ongoing legal case in Texas. As *Reuters* notes in their headline: ¹³[Planned Parenthood must face trial over Texas Medicaid fraud claims](https://www.reuters.com/legal/planned-parenthood-must-face-trial-over-texas-medicaid-fraud-claims-2023-10-24/).

Other evidence of financial issues come up in the Select Committee’s ¹⁴[Final report: Dec. 30, 2016](https://lifelegal.org/wp-content/uploads/2020/01/Select_Investigative_Panel_Final_Report.pdf): “*The Charlotte Lozier Institute* and *Alliance Defending Freedom* have documented that — based on 51 known external audits or other reviews of *Planned Parenthood* affiliates’ financial data and practices, and 61 federal audits of state family planning programs by HHS-OIG — *Planned Parenthood* affiliates have overbilled \$132.4 million in Medicaid and other healthcare funding programs. These audit results are troubling, given their limitations in scope, detail, and timeframe; in fact, of 57 U.S. *Planned Parenthood* affiliates, only 19 have been audited.”

The Panel also:

- Learned there were HIPPA privacy rights violations.
- Found numerous irregularities with handling of tissue and donations.
- Reported “allegations include eyewitness account of the doctor killing infants who show signs of life both when partially outside the birth canal ... and outside the birth canal ... both violations of law.
- Uncovered documents and received testimony from confidential informants indicating that four *Planned Parenthood* clinics and Novogenix, may have violated federal law.

+ EVIDENCE OF FAILING TO FOLLOW HEALTH & SAFETY STANDARDS: In regard to other law breaking, consider an ongoing project from *Americans United for Life* (AUL), through extensive review of health and safety violations, first released in 2017, and again in 2021.

“AUL’s legal staff reviewed over 25,000 pages of documents obtained through state Freedom of Information Acts, consisting of over 1,300 abortion facility inspection reports from the 39 states that conduct inspections of abortion businesses,” ¹⁵[they report](https://aul.org/wp-content/uploads/2021/02/AUL-Unsafe-2021.pdf).

¹² <https://energycommerce.house.gov/news-center/letters/select-investigative-panel-criminal-and-regulatory-referrals>

¹³ <https://www.reuters.com/legal/planned-parenthood-must-face-trial-over-texas-medicaid-fraud-claims-2023-10-24/>

¹⁴ https://lifelegal.org/wp-content/uploads/2020/01/Select_Investigative_Panel_Final_Report.pdf

¹⁵ <https://aul.org/wp-content/uploads/2021/02/AUL-Unsafe-2021.pdf>

In 2021: **UNSAFE** details the reality of conditions in abortion businesses, documenting that more than 300 facilities in 39 states were cited for more than 2,400 health and safety deficiencies between 2008 and 2020, including hundreds of significant violations of state laws meant to ensure basic health and safety.

[Link to report here](#), noting: “More than 2,400 abortion facility health and safety violations reported in just the last 12 years (2008-2020), implicating well over 300 abortion businesses in hazardous, unclean abortions ... operating without a license, utilizing unlicensed, unqualified, or untrained abortionists and staff, repeatedly fined for filthy conditions, and dangerously mishandling narcotics and other drugs”

+ **REPEATED FAILURES TO REPORT SEX CRIMES:** *Planned Parenthood* has long been accused of failing to report underage girls in abusive situations. SFLA often shares such stories, such as this one from 2021: [Doctor on Planned Parenthood Board Only Reports Sexual Abuse of Girls “In Some Cases”](#)

¹⁷“[Dr. Noor Zwayne, a “Pediatric Gynecologist”](#) in Arizona and *Planned Parenthood Arizona* board member, was interviewed by Ethan Cox (a *Planned Parenthood* associate) in their “Care No Matter What” podcast. It was everything you’d expect from a “pediatric gynecologist” on the board of the nation’s biggest abortion vendor ...

She admits that in her job, Zwayne has to deal with the sexual abuse of youth, particularly young girls. Cox then asks her about the mandated reporting laws of such abuse. Her response was as disturbing as it was shocking. “*In some cases, I have to report it to the police,*” she responded.

This should lead to investigation into why she reported to the police only in some cases. In what cases are the rapes or sexual abuses of children *not* reported to authorities?

All U.S. states have ¹⁸[mandatory reporting laws](#), meaning that certain individuals in certain professions are required to report suspected abuse of minors. In Arizona, too, physicians are mandated reporters of suspected child abuse. RAINN, an organization active against sexual assault, ¹⁹[notes](#):

- Anyone who fails to make a required report is guilty of a Class 1 misdemeanor, except if the failure to report involves certain specific offenses listed in the statute, the person is guilty of a Class 6 felony.

This alleged failure has often been illustrated in ongoing undercover videos and reporting.

Just a few other examples:

¹⁶ <https://studentsforlife.org/2021/09/14/doctor-on-planned-parenthood-board-only-reports-sexual-abuse-of-girls-in-some-cases/>

¹⁷ <https://phoenixchildrens.org/find-a-doctor/noor-h-zwayne-md>

¹⁸ https://en.wikipedia.org/wiki/Mandated_reporter#United_States

¹⁹ https://apps.rainn.org/policy/policy-state-laws.cfm?state=Arizona&group=4&_ga=2.217500886.1706713944.1631643718-1665034628.1631643718

- Missouri Attorney General Andrew Bailey’s statement: ²⁰[Attorney General Bailey Files Suit Against Planned Parenthood for Trafficking Children Out-of-State to Obtain Abortions Without Parental Consent](https://ago.mo.gov/attorney-general-bailey-files-suit-against-planned-parenthood-for-trafficking-children-out-of-state-to-obtain-abortion-without-parental-consent/)
- AUL’s UNSAFE: ²¹[A groundbreaking 50-state investigative report on America’s abortion industry conditions.](https://aul.org/publications/unsafe/)
- National Review: ²²[Planned Parenthood’s Continued Failure to Report Evidence of Child-Sex Trafficking](https://www.nationalreview.com/2017/01/planned-parenthood-child-sex-trafficking-crimes-still-unreported/)
- Catholic News Agency: ²³[Suit claims Colo. Planned Parenthood ignored sex abuse](https://www.catholicnewsagency.com/news/30085/suit-claims-colo-planned-parenthood-ignored-sex-abuse)
- FOX: ²⁴[Planned Parenthood counselor withheld info on rape, police report reveals](https://www.foxnews.com/us/planned-parenthood-counselor-withheld-info-on-rape-police-report-reveals)
- The Daily Signal: ²⁵[Report: Planned Parenthood Has Failed to Report Sexual Abuse](https://www.dailysignal.com/2015/09/07/report-planned-parenthood-has-failed-to-report-sexual-abuse/)

+ EMPLOYEE REPORTS & LEGAL ACTION FROM ACCUSATIONS OF A RACIST WORK ENVIRONMENT: Numerous complaints and lawsuits have been filed against *Planned Parenthood*, charging the mega-abortion vendor with bad working conditions. Case in point, the *Washington Times* 2020 story headlined: ²⁶[Planned Parenthood accused of racism by employees, supporters](https://www.washingtontimes.com/news/2020/jul/5/planned-parenthood-accused-racism-employees-supporters/), which reported: “A letter signed by more than 350 ‘current and former staffers/ of *Planned Parenthood* of Greater New York, as well as about 800 donors, supporters and volunteers, declared that founder Margaret Sanger was ‘a racist, white woman’ and that the organization suffers from ‘institutional racism.’”

More examples of similar concerns:

- LiveAction: ²⁷[More than two dozen lawsuits have been filed by former Planned Parenthood staff alleging racism](https://www.liveaction.org/news/two-dozen-lawsuits-former-planned-parenthood-racism)
- NPR: ²⁸[A former employee sues Planned Parenthood, claiming she faced months of racism](https://www.npr.org/2022/10/20/1130133440/planned-parenthood-racism-lawsuit)
- Crumiller, The Feminist Litigation Firm: ²⁹[Second Race Discrimination Lawsuit Filed against Planned Parenthood](https://crumiller.com/second-race-discrimination-lawsuit-planned-parenthood-tennessee/)
- KMOV, St. Louis: ³⁰[Former St. Louis Planned Parenthood employee sues for racial discrimination](https://www.firstalert4.com/2024/06/06/former-st-louis-planned-parenthood-employee-sues-racial-discrimination/)

²⁰ <https://ago.mo.gov/attorney-general-bailey-files-suit-against-planned-parenthood-for-trafficking-children-out-of-state-to-obtain-abortion-without-parental-consent/>

²¹ <https://aul.org/publications/unsafe/>

²² <https://www.nationalreview.com/2017/01/planned-parenthood-child-sex-trafficking-crimes-still-unreported/>

²³ <https://www.catholicnewsagency.com/news/30085/suit-claims-colo-planned-parenthood-ignored-sex-abuse>

²⁴ <https://www.foxnews.com/us/planned-parenthood-counselor-withheld-info-on-rape-police-report-reveals>

²⁵ <https://www.dailysignal.com/2015/09/07/report-planned-parenthood-has-failed-to-report-sexual-abuse/>

²⁶ <https://www.washingtontimes.com/news/2020/jul/5/planned-parenthood-accused-racism-employees-supporters/>

²⁷ <https://www.liveaction.org/news/two-dozen-lawsuits-former-planned-parenthood-racism>

²⁸ <https://www.npr.org/2022/10/20/1130133440/planned-parenthood-racism-lawsuit>

²⁹ <https://crumiller.com/second-race-discrimination-lawsuit-planned-parenthood-tennessee/>

³⁰ <https://www.firstalert4.com/2024/06/06/former-st-louis-planned-parenthood-employee-sues-racial-discrimination/>

- Bloomberg Law: ³¹[Planned Parenthood of NY Sued for Racial Bias by Top Exec](https://news.bloomberglaw.com/daily-labor-report/planned-parenthood-of-ny-sued-for-racial-bias-by-a-top-executive)

AN ACCUMULATION OF ISSUES BASED ON THE GAO CRITERIA:

The concerns over the misuse of the paycheck protection plan and Medicaid fraud should trigger an investigation for “*commission of fraud, embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, tax evasion, violating Federal criminal laws, receiving stolen property, an unfair trade practice.*”

The concerns of turning a blind eye to sex trafficking, ignoring health and safety standards, and profiting from an illegal market in human remains should trigger an investigation for “*knowing failure to disclose violation of criminal law.*”

But there are other issues raised by the business model.

An article published by the journal *Contraception* titled, “Prescription opioid fills following surgical abortion,” concluded: “The frequency of an opioid fill after surgical abortion among commercially-insured women was notable given it is not recommended for post-procedural analgesia. Opioid prescribing contrary to recommendations may be associated with subsequent chronic use or abuse.” Such a study indicates the need for investigation for possible “*violation of the Drug-Free Workplace Act.*”

And surely, turning a blind eye to the treatment of employees and operating an allegedly racist work environment connects to “*any other cause that affects present responsibility.*”

That category must now include allegations of fraud. While Missouri’s Attorney General, ³²[Andrew Bailey, filed a lawsuit](https://www.washingtonexaminer.com/policy/healthcare/3479665/missouri-andrew-bailey-sues-planned-parenthood-abortion-pill-advertising/) related to misleading business practices, accusing *Planned Parenthood* ³³[of making false claims](https://studentsforlife.org/2024/02/27/students-for-life-of-america-files-scotus-amicus-brief/) about their deadly drugs.

And “*any other cause*” must certainly involve concerns with abortion water pollution.

SFLA’s own work as a leader in confronting the deadly realities of Chemical Abortion Pills, in a large body of work including ³⁴[FIVE citizen petitions](https://thisischemicalabortion.com/citizenspetition/) to the *Food & Drug Administration* (FDA) and an ³⁵[amicus brief to the Supreme Court](https://studentsforlife.org/2024/02/27/students-for-life-of-america-files-scotus-amicus-brief/), illustrates that a dangerous consequence of Chemical Abortion Pills is risk to the environment, endangered species, and crystal-clear, drinking water. *Planned Parenthood* ignores such risks, perhaps as a cost-cutting measure, turning a blind eye to chemically tainted blood and placenta tissue, along with human remains, now flushed into waterways.

³¹ <https://news.bloomberglaw.com/daily-labor-report/planned-parenthood-of-ny-sued-for-racial-bias-by-a-top-executive>

³² <https://ago.mo.gov/wp-content/uploads/2025-7-21-Petition-Missouri-v.-PPFA.pdf>

³³ <https://www.washingtonexaminer.com/policy/healthcare/3479665/missouri-andrew-bailey-sues-planned-parenthood-abortion-pill-advertising/>

³⁴ <https://thisischemicalabortion.com/citizenspetition/>

³⁵ <https://studentsforlife.org/2024/02/27/students-for-life-of-america-files-scotus-amicus-brief/>

Neither ³⁶[brick-and-mortar abortion vendor operations or hospitals](#) are permitted to flush human remains, placenta tissue, and blood into our waterways. And yet, in this pivot to pill pushing, *Planned Parenthood* cuts disposal costs and ignores environmental regulations that impact their other businesses with reckless distribution of Chemical Abortion Pills.

The scope of this environmental crisis boggles the mind. If you use abortion industry data from the *Guttmacher Institute* to calculate the scope of abortion water pollution, ³⁷[more than 50.21 TONS](#) of placenta tissue and broken bodies are flushed into our waterways.

And yet, the so-called environmentally-focused Green Party agenda disappears when the issue is abortion. *Planned Parenthood* has benefited from a close relationship with the Democratic Party and has invested heavily in their success, and their political friends have turned a blind eye to the human and environmental costs.

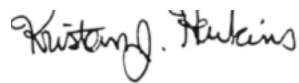
All together, these are troubling issues with wide-ranging impact – from misuse of taxpayer resources, mistreatment of those unfortunate enough to darken their door, and potential environmental hazards.

Many raise concerns about removing this unqualified vendor from the federal payroll because of the other services *Planned Parenthood* offers. However, everything *Planned Parenthood* can do, Federally Qualified Healthcare providers can do better, minus the loss of patient life. *Planned Parenthood* has ³⁸[fewer than 600 locations](#) compared to ³⁹[more than 19,000 alternatives](#) through Federally Qualified Health Centers and look-alikes. The difference between the two is full-service care. One offers healthcare to all, planning for all patients to survive their visit. The other offers death by intentional abortion, first and foremost, while claiming that they have other critical services, like offering contraceptives which are already widely available elsewhere.

⁴⁰[Debarments of bad actors](#) have already begun in the Trump Administration. The *Pro-Life Generation* asks that the SBA begin an investigation to debar and delist *Planned Parenthood* as a disreputable vendor – unqualified to receive scarce taxpayer resources better spent elsewhere.

Sincerely,

Kristan Hawkins



³⁶ <https://www.cdc.gov/infection-control/hcp/environmental-control/regulated-medical-waste.html#:~:text=1406%E2%80%931408,be%20securely%20closed%20for%20disposal>.

³⁷ <https://studentsforlife.org/2025/07/23/breaking-new-report-from-students-for-life-notes-more-than-50-tons-of-human-tissue-remains-dumped-each-year-as-a-result-of-abortion-water-pollution/>

³⁸ <https://lozierinstitute.org/fact-sheet-community-health-centers-outnumber-planned-parenthood-facilities-15-to-1/>

³⁹ <https://www.definitivehc.com/blog/how-many-fqhcs-are-there>

⁴⁰ <https://nypost.com/2025/01/18/us-news/hhs-bans-ecohealth-alliance-and-groups-ex-prez-from-receiving-federal-funding-for-5-years-after-wuhan-virus-experiments/>

President, *Students for Life of America & Students for Life Action*
CEO, *Pro-Life Generation*