



**Danielle White**  
*General Counsel*  
[dwhite@heartbeatinternational.org](mailto:dwhite@heartbeatinternational.org)

September 16, 2021

Imran Ahmed  
Chief Executive Officer  
Center for Countering Digital Hate  
Delivered via email: [info@counterhate.com](mailto:info@counterhate.com) and [press@counterhate.com](mailto:press@counterhate.com)

Re: Demand to Remove Factually False Information from “Endangering Women for Profit” Report

Dear Mr. Ahmed,

This letter is to request the full and immediate removal of the following incorrect data from the report titled *Endangering Women for Profit* (the “Report”), posted here: <https://www.counterhate.com/endangeringwomen>.

The Appendix: Google ads dataset, beginning on page 23 of the report contains over 100 entries that list Heartbeat International (“Heartbeat”) in the “Advertiser Name” column. In fact, as your organization would have learned if it had done its due diligence, Heartbeat did not place a single advertisement that your organization’s Report has misattributed to Heartbeat. Thus, this appendix is factually false and must be corrected or removed immediately.

Furthermore, any analysis and conclusions drawn on the basis of the factually false information contained in the appendix must be revised accordingly. For example, page 13 of the Report states that “98% of the ads collected in this research were placed by prominent Ohio-based anti-abortion organization Heartbeat International and its Abortion Pill Rescue program.” This is factually incorrect, and has caused ongoing damage to Heartbeat’s reputation.

Therefore, Heartbeat demands that you immediately remove the erroneous information from the Report and issue a correction noting the inaccuracies contained in the original Report. Please send proof that you have taken these remedial steps by email by September 17, 2021. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in purple ink that reads "Danielle M. White".

Danielle M. White  
General Counsel