



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

IN THE MATTER OF:

CID No. 23-24

Washington University Pediatric Transgender
Center at St. Louis Children's Hospital

March 10, 2023

CIVIL INVESTIGATIVE DEMAND

TO: Planned Parenthood of the St. Louis Region and Southwest Missouri

Serve Principal Office Address:
4251 Forest Park Ave.
Saint Louis, MO 63108-2810

The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether the Washington University Pediatric Transgender Center at St. Louis Children's Hospital ("Subject"), its agents or employees, or others in the state providing similar services have engaged in or are engaging in any practices declared to be unlawful by § 407.020, RSMo. This investigation will inquire into, among other things, the activities and representations of Subject in connection with products and services offered in Missouri. The Attorney General has reason to believe that Subject or others in the state may have used deception, fraud, false promises, misrepresentation, unfair practices, and/or the concealment, suppression, or omission of material facts within the scope of the Missouri Merchandising Practices Act. The Attorney General's investigation is based in part on, but is not limited to, allegations made in a sworn affidavit by Jamie Reed. That affidavit was recently made public.¹

The Attorney General believes that you have information, documentary material, and/or physical evidence relevant to the investigation described above. Prompt compliance with this Civil Investigative Demand is mandatory. § 407.080, RSMo.

Except for disclosure to employees or counsel as necessary to facilitate your compliance with this investigation demand, or disclosure you are required to make by law, you are requested not to disclose the existence of this Investigative Demand. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Compliance with this request is required by law. *See* § 407.080, RSMo. ("A person upon whom a civil investigative demand is served pursuant to the provisions of section 407.040 shall comply with the

¹ <https://ago.mo.gov/docs/default-source/press-releases/2-07-2023-reed-affidavit---signed.pdf>

EXHIBIT

1

terms thereof unless otherwise provided by an order of a court.”). Please advise employees that this request is confidential.

INSTRUCTIONS

1. Unless specifically stated otherwise, please restrict your search for all information and documents requested below to the period from when You first began offering “Your Services” as defined in definition 13, *infra*.
2. For all of your responses, You must identify—by Bates range, or by file names and locations—the Documents responsive to each particular request.
3. For each Document produced or answer provided, identify by number which request or requests the Document or answer responds to.
4. For requests seeking written answers, provide the answer in **boldface** in a paragraph or paragraphs directly beneath the numerical request.
5. If you have knowledge of a responsive Document or responsive information, but do not have the responsive Document or information in your possession, custody, or control, Identify the Person that you believe has that Document or information in its possession, custody, or control.
6. If You do not know the answer to a request, Identify the Person that You believe does have the responsive information.
7. Your answers to requests for information must be signed under oath by the Person providing the responsive information. This might entail separate Persons verifying responses to different requests.
8. Provide all material as quickly as possible, which may mean providing responsive material in batches.
9. If You believe that You have responsive materials that are privileged, You must produce a privilege log that identifies each Document or communication, the basis for withholding it, and sufficient information to permit the Attorney General’s Office to assess whether it is privileged.
10. The Missouri Attorney General may serve additional civil investigative demands on You.
11. Please note that under § 407.080, RSMo, certain acts done with the intent to avoid, evade, or prevent compliance in whole or in part with any civil investigative demand constitute a Class A misdemeanor, which is punishable by fines or imprisonment or both.
12. No extension of the deadline for compliance with this Civil Investigative Demand is effective unless it is reflected in a writing executed by an authorized representative of the Missouri Attorney General.

13. As authorized by § 407.040, RSMo, the Attorney General demands that—no later than 10:00 a.m. (Central) on March 31, 2023—You produce responsive documents and information to the Missouri Attorney General’s Office. Submit the Certification of Compliance, all documents, and all responsive information to:

James Simeri
Deputy Chief, Consumer Protection
Missouri Attorney General’s Office
815 Olive Street, Ste. 200
St. Louis, MO 63101
james.simeri@ago.mo.gov
(573) 301-6184

DEFINITIONS

As used in this Civil Investigative Demand, the following definitions apply:

1. “You” and “Your” means Planned Parenthood of the St. Louis Region and Southwest Missouri; and all agents, representatives, employees, independent contractors, attorneys, and other persons, including but not limited to Providers (defined below), acting or purporting to act on behalf of it or its subsidiaries, parent companies, or sister companies.
2. “And” and “or” are to be construed broadly to include both the disjunctive and the conjunctive, to be equivalent to “and/or,” to render these Requests as broad as possible.
3. “Client” means all customers who express an identity different from their natal sex to whom You have provided or are providing Your Services, Clients’ parents, or Clients’ legal guardians. Unless stated otherwise, all requests for documents or information in this CID are limited to Clients who first started receiving Your Services before the age of 18.
4. “Communication” means any expression, statement, conveyance, or dissemination of any words, thoughts, statements, ideas, or information, regardless of form, format, or kind. “Communication” includes but is not limited to oral or written communications of any kind, such as telephone conversations, discussions, meetings, notes, letters, agreements, emails or other electronic communications, text messages, facsimiles, and other forms of written or oral exchange that are recorded in any way, including video recordings, audio recordings, written notes, or otherwise. Any Communication that also falls within the definition of “Document” constitutes both a Document and a Communication for purposes of this civil investigative demand.
5. “Document” includes every “writing,” “recording,” and “photograph” as Federal Rule of Evidence 1001 defines those terms, as well as any “duplicate” of any writing, recording, or photograph. “Document” includes, but is not limited to electronic documents, files, databases, and records, including but not limited to emails, voicemails, text messages, calendar appointments, instant messages, MMS messages, SMS messages, iMessages, computer files, spreadsheets, and metadata. The term Document includes every draft of any other material that falls within the definition of Document.

6. “Identify”, when used with respect to a person or entity, means information sufficient to allow the Attorney General to ascertain the current contact information (name, home or business address, telephone number, email), and if not a natural person, the current contact information for Your point of contact with the entity or facility Identified, as well as the relationship of that person or entity to You.
7. “Identify”, when used with respect to a fact or event, means information sufficient to allow employees of the Attorney General to ascertain the fact or event with reasonable particularity, and to identify each person believed to have knowledge with respect to the fact or event and each document that refers or relates to the fact or event.
8. “Identify”, when used with respect to a transaction, means to provide information sufficient to allow ascertainment of the banking and financial information of the sending and receiving parties, the method of payment or funds transfer, and the natural persons involved with the transfer or payment.
9. “Identify”, when used with respect to a Communication, means to state with specificity the date of the Communication; the medium of communication; the location of the Communication; the names and aliases of the persons who made the Communication; and the names and aliases of all persons who were present when the statement was made, who received the Communication, who heard the Communication, or who came to know of the content of the Communication at a later time.
10. “Provider” includes any Medical Doctor, Doctor of Osteopathic Medicine, Nurse Practitioner, Psychologist, Psychiatrist, Mental-Health Counselor, Therapist, Social Worker, Behavioral Health Professional, Physician Assistant, or other person providing Your Services or employed in a position to assist persons providing Your Services.
11. “Person” means any natural person, corporation, proprietorship, partnership, association, firm, or entity of any kind.
12. “Relating to”, “related to”, and “relate to” mean to be relevant in any way to the subject matter, including, without limitation, all information that directly or indirectly contains, records, reflects, summarizes, evaluates, refers to, is pertinent to, indicates, comments upon, or discusses the subject matter; or that states the background of, or was the basis for, or that records, evaluates, comments, was referred to, relied upon, utilized, generated, transmitted, or received in arriving at any conclusion, opinion, estimate, position, decision, belief, policy, practice, course of business, course of conduct, procedure, or assertion concerning the subject matter.
13. “Your Services” refers to services provided by You to Clients. These services include, but are not limited to:
 - a. Hormone therapy and specialty care (such as endocrinology, adolescent medicine, gynecology and urology);
 - b. Surgical procedures;

- c. Social work and legal assistance, if needed;
- d. Psychological or Psychiatric services; and
- e. Mental or behavioral health support via referrals to psychology, psychiatry, and community therapists.

REQUESTS FOR INFORMATION AND DOCUMENTS

1. Identify all Persons responsible for providing Documents and information responsive to this Civil Investigative Demand. For each Person identified, Identify the specific requests to which each Person contributed Documents or information.
2. Produce all Documents that You Identified, referred to, used to prepare, or concerning any of Your responses to any of these specific requests that are not otherwise produced.
3. If Documents or information responsive to a particular request have been lost or destroyed, state the circumstances under which the Documents or information were lost or destroyed, describe the lost or destroyed Documents or information to the fullest extent possible, state the specific demand to which they are responsive, and identify all Persons having knowledge of their content.
4. Have You provided puberty blockers, cross-sex hormones, and/or transgender surgery to Clients? If so, state which of these services you have provided to Clients and the date on which You first began offering each such service to Clients.
5. If You provide or have provided puberty blockers, cross-sex hormones, and/or transgender surgeries to Clients, produce all studies You have relied on to justify such practices, and produce all Documents where You have stated You are relying on those studies.
6. If You provide or have provided puberty blockers, cross-sex hormones, and/or transgender surgeries to Clients, produce all Documents where you have described these procedures as evidence based.
7. Describe in detail your intake process for determining whether a Client should be prescribed or recommended puberty blockers or cross-sex hormones.
8. Describe in detail what you understand to be the standard of care for Clients identifying as transgender.
9. Produce all Documents containing Your operating policies and standards of care for Clients.
10. Describe the minimum criteria needed for Your Providers to recommend or prescribe cross-sex hormones or puberty blockers.

11. How have Your Services changed in response to the United Kingdom, Sweden, and Finland substantially altering their approach in recent years to treating children who identify different from their natal sex?
12. Produce all Documents reacting to, discussing, or referencing one or more of the following publications, as well as any other variant of what is listed:
 - a. National Institute for Health and Care Excellence (2020). Evidence review: Gonadotrophin releasing hormone analogues for children and adolescents with gender dysphoria.
 - b. National Institute for Health and Care Excellence (2020). Evidence review: Gender-affirming hormones for children and adolescents with gender dysphoria.
 - c. National Board of Health and Welfare (2022). Care of children and adolescents with gender dysphoria.
 - d. Palveluvalikoima (PALKO / COHERE Finland) (2020). Recommendation of the Council for Choices in Health Care in Finland: Medical treatment methods for dysphoria related to gender variance in minors (or Palveluvalikoimaneuvoston suositus: Alaikäisten sukupuoli-identiteetin variaatioihin liittyvän dysforian lääketieteelliset hoitomenetelmät).
 - e. SBU, National Board of Health and Welfare (2022) (Sweden). Hormone therapy for gender dysphoria – children and young people (or Hormonbehandling vid könsdysfori – barn och unga).
 - f. French National Academy of Medicine (2022). Medicine and gender transidentity in children and adolescents (or La médecine face à la transidentité de genre chez les enfants et les adolescents).
 - g. The Cass Review (2022). Independent review of gender identity services for children and young people: Interim report.
13. Produce all Documents from or to Providers since January 1, 2020, discussing or referencing one or more of the following people, organizations, or topics, as well as any other variant of what is listed:
 - a. NHS Gender Identity Development Service, Gids, GIDs, Tavistock
 - b. Toronto Centre for Addiction and Mental Health, CAMH
 - c. Social media, TikTok, Instagram, YouTube, Facebook, Meta, Snapchat
 - d. Social contagion
 - e. Swedish National Board of Health and Welfare

- f. Finnish Health Authority
- g. Florida Boards of Medicine and Osteopathic Medicine
- h. Rules 64B8-9.019 and 64B15-14.014

14. Do You have, or have You ever had, a policy requiring written consent from parents before placing Clients on puberty blockers or cross-sex hormones? If so, when was this policy in place? If You have ever had such a policy in place, produce supporting Documentation.
15. Do You have, or have You ever had, a policy of asking parents or legal guardians for any applicable custody agreements before placing Clients on puberty blockers or cross-sex hormones? If so, when was this policy in place? If You have ever had such a policy in place, produce supporting Documentation.
16. Do You have, or have You ever had, a policy requiring Clients to be formally assessed for autism before starting them on puberty blockers or cross-sex hormones? If so, when was this policy in place? If You have ever had such a policy in place, produce supporting Documentation.
17. Do You have, or have You ever had, a policy requiring Clients presenting with mental-health comorbidities to have those comorbidities treated before starting on puberty blockers or cross-sex hormones? If so, when was this policy in place? If You have ever had such a policy in place, produce supporting Documentation.
18. Do You have, or have You ever had, a policy prohibiting prescription of puberty blockers or cross-sex hormones to Clients presenting with mental-health comorbidities unless those patients agreed to have those comorbidities treated while simultaneously receiving puberty blockers or cross-sex hormones? If so, when was this policy in place? If You have ever had such a policy in place, produce supporting Documentation.
19. Do You have, or have you ever had, a policy requiring tracking Clients to determine whether they were experiencing adverse effects from puberty blockers or cross-sex hormones? If so, when was this policy in place? If You ever had such a policy in place, produce supporting Documentation.
20. Do You have, or have You ever had, a policy requiring tracking of all former Clients to determine whether they were experiencing adverse effects from puberty blockers or cross-sex hormones? If so, when was this policy in place? If You have ever had such a policy in place, produce supporting Documentation.
21. Do You have, or have You ever had, a policy requiring tracking suicides or attempted suicides of current or former Clients? If so, when was this policy in place? If You have ever had such a policy in place, produce supporting Documentation.
22. Produce all Documents where Your Provider, employee, or staff member referred to a practice or activity as experimental, speculative, unproven, or any other variant.

23. Have any of Your Providers prescribed bicalutamide to Clients?
24. If Your Providers have prescribed bicalutamide, produce all studies You have relied on to justify prescribing bicalutamide to Clients, and produce all Documents where You have stated You are relying on those studies.
25. Have You relied on any studies that control for psychological or psychotherapy intervention to test whether hormonal treatment leads to better outcomes for Clients than psychological or psychotherapy intervention? If so, produce those studies.
26. Produce all Documents where Your faculty or staff have reported Child abuse as mandatory reporters.
27. Produce all Documents discussing the adverse side effects of puberty blockers or cross-sex hormones on children.
28. Produce all Documents discussing sterility as it relates to side effects of puberty blockers or cross-sex hormones given to children.
29. Produce all Documents stating or suggesting that puberty blockers are or may be reversible.
30. Produce all annual reports for each Provider.
31. Produce all Documents describing how your Providers do or should differentiate between gender-nonconforming behavior and gender dysphoria in Clients.
32. Produce all Documents in which Your Providers, employees, or staff members have expressed concern about providing puberty blockers or cross-sex hormones as a means to treat gender dysphoria in Clients or to treat Clients who question their gender identity or who identify as anything other than their natal sex.
33. Produce all solicitations or promotional materials that You have provided to Clients, prospective Clients, or their parents, made in any form or medium, relating to Your Services. This request includes but is not limited to Power-Point, Google Slides, toolkits, or similar presentation materials, and other Documents related to oral presentations.
34. Produce all Your organizational charts related to Providers since You began providing Your Services.
35. Produce all curricula vitae and résumés for all of Your Providers and related staff.
36. State the total number of gender-transition surgeries performed by You or Your providers including “top surgery” and “bottom surgery,” and any other variant, on Clients.
37. State the number of gender-transition surgeries recommended by You or Your Providers, including “top surgery” and “bottom surgery,” and any other variant, for Clients.

38. For each month since You began providing Your Services, state the number of Clients who were started on puberty blockers.
39. For each month since You began providing Your Services, state the number of Clients who were started on cross-sex hormones.
40. Identify the youngest age at which You have prescribed or recommended cross-sex hormones to a Client.
41. Identify the youngest age at which You have prescribed or recommended puberty blockers to a Client.
42. Describe Your procedures for tracking and documenting complications and adverse events related to Your Services.
43. Produce all Documents related to Your procedures for tracking and documenting complications and adverse events related to Your Services.
44. Identify all complaints that You have received about your treatment of Clients. For each such complaint, Identify the person who complained, the date, the subject of the complaint, and the resolution of the complaint.
45. Produce all Documents related to complaints about the treatment of Clients.
46. Produce all template-referral letters or language for hormonal or surgical treatment that You have sent to therapists of Clients to complete and return to You.
47. List all indications for which You have prescribed bicalutamide to Clients.
48. Describe Your procedures for obtaining informed consent from parents or legal guardians for providing Your Services to Clients, including any policies You have in place for documenting and preserving consent in writing, as well as any procedures You have in place for verifying whether an adult accompanying a child Client is the Child's parent or legal guardian.
49. Produce all Documents related to the procedures identified in response to the preceding request.
50. Describe Your practices, formal or informal, for handling situations where one or more of a Client's parents or legal guardians express concerns about, or are reluctant to consent to, the prescription of puberty blockers, cross-sex hormones, or other hormonal or surgical intervention for Clients.
51. Produce all Documents related to the practices identified in response to the preceding request.
52. Produce all Communications between You and Missouri grade schools, middle schools, and high schools, related to Your Services.

53. Identify the number of times you have billed a publicly funded healthcare program, such as Medicare, for your Services. For each time, Identify the reason you billed a publicly funded healthcare program.
54. Describe all changes that You made or caused to be made to the content of your website, including its homepage and all its subsidiary pages, between 12:00 AM Central Time on February 6, 2023, and receiving this CID. For each change, explain the reason why You made the change or caused it to be made.

/s/ Joshua M. Divine

Joshua M. Divine, Mo. Bar. No. 69875

Solicitor General

Missouri Attorney General

207 West High St.

Jefferson City, MO 65101

IN THE MATTER OF:

CID No. 23-24

Washington University Pediatric Transgender
Center at St. Louis Children's Hospital

March 10, 2023

CERTIFICATION OF COMPLIANCE

I certify that all documents and information required by Civil Investigative Demand, which is in the possession, custody, control, or knowledge of Planned Parenthood of the St. Louis Region and Southwest Missouri has been submitted to the Missouri Attorney General as directed.

Signature

Printed Name

Position

Date

State of Missouri)
)
City of St. Louis)

On this day, _____ personally appeared before me, a notary public in Missouri. I know him to be the individual who signed this document, and he acknowledged to me that he signed it for the purposes stated in it.

Notary Public

Date