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REPLY TO FLORIDA

November [REDACTED] 2025

Via Email Only

FAMILY MEMBER [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

TIME SENSITIVE LEGAL CORRESPONDENCE

RESPONSE REQUIRED BY [REDACTED], NOVEMBER [REDACTED], 2025

RE: Representation of TEEN MOTHER – Coerced Abortion

Dear FAMILY MEMBER [REDACTED]:

Liberty Counsel is a national non-profit litigation, education, and public policy organization with an emphasis on First Amendment liberties, and a particular focus on the sanctity of human life and religious freedom. Liberty Counsel has had great success in vindicating our clients' rights.

Liberty Counsel has received authorization from [REDACTED], TEEN MOTHER [REDACTED] to represent her and act on her behalf to prevent you [REDACTED] FAMILY MEMBER [REDACTED] from coercing her in any way to board a plane out of state on [REDACTED], November [REDACTED], 2025, to receive an abortion that she does not want. We hereby inform you that you are not authorized to speak to [REDACTED] TEEN MOTHER [REDACTED] about her pregnancy or this contact by Liberty Counsel, until further authorized by Liberty Counsel. With all due respect, we are now speaking on her behalf to you.

The Florida Office of Attorney General ("OAG") is awaiting further updates from Liberty Counsel, to ensure that you do not violate [REDACTED] TEEN MOTHER [REDACTED]'s rights. The OAG has requested that Liberty Counsel inform its staff as to whether you will voluntarily comply with this request.

Please provide written assurances to Liberty Counsel by [REDACTED] November [REDACTED] 2025, that [REDACTED] FAMILY MEMBER [REDACTED] has:

- 1. Cancelled the abortion appointment (screenshots are acceptable).**

2. **Cancelled the plane tickets (screenshots are acceptable).**
3. **Committed to cease and desist from engaging in any threats, emotional abuse, coercion, or any other form of manipulation or physical abuse to coerce [TEEN MOTHER] into traveling out of Florida to receive an abortion.**

If we do not receive these responses [REDACTED], Liberty Counsel will take immediate action, including but not limited to the following:

- a) Informing the Florida Office of the Attorney General and recommending intervention;
- b) Filing an abuse report with Florida Department of Children and Families at <https://reportabuse.myflfamilies.com/s/new-report>;
- c) Requesting a welfare check at your home by [REDACTED] County Sheriff's Office to remove [TEEN MOTHER] from the situation if crimes are being committed;
- d) Seeking an emergency court order for emancipation of [TEEN MOTHER] so that she may live without continued coercion and emotional abuse by [FAMILY MEMBER];
- e) Notifying out-of-state abortion clinics of our representation of [TEEN MOTHER] and the certainty of a lawsuit against them (and you) for conspiracy to violate [TEEN MOTHER]'s civil rights if they perform an abortion on her at your direction without her consent.

Liberty Counsel has already informed the Florida Office of the Attorney General ("OAG") about the situation as follows:

- [TEEN MOTHER] is 17 years old; pregnant and desires to give life to her baby. [TEEN MOTHER] reports her [REDACTED], [FAMILY MEMBER], is very angry she is pregnant; has scheduled an abortion out of state; has purchased plane tickets departing Monday.
- [TEEN MOTHER]'s Christian religious beliefs prohibit her from receiving an abortion.
- [FAMILY MEMBER] has further threatened to kick her out of the house if she does not comply with [REDACTED] abortion demand; and has prevented her from leaving the house and taken away her phone so she cannot call for help.
- [TEEN MOTHER] further reports [FAMILY MEMBER] has held her back out of school for the past week, so that she cannot seek help from the school authorities or from friends.
- [TEEN MOTHER] reports further instances of emotional abuse, including [FAMILY MEMBER] making sarcastic statements about her soon-to-be-dead baby.

If Liberty Counsel is required to file a lawsuit to seek a court order on behalf of [TEEN MOTHER] the matter will become public record with all that entails.

All of our cases involving a lawsuit are publicized by our media department. *See, e.g.*, <https://lc.org/newsroom/press-releases>; and specifically, [REDACTED]

OTHER LIBERTY COUNSEL CASES

You may have read in the national press about our 9-0 unanimous United States Supreme Court victory against the City of Boston, in connection with its religious discrimination against Christians. See *Shurtleff v. City of Boston*, 142 S. Ct. 1583 (2022), (See, e.g., Adam Liptak, *Supreme Court Rules Against Boston in Case on Christian Flag*, New York Times (May 2, 2022) <https://www.nytimes.com/2022/05/02/us/supreme-court-boston-flag-free-speech.html>). The City of Boston was required to pay Liberty Counsel **\$2.1 million** in attorney's fees and costs.

In 2020 and 2021, our groundbreaking lawsuits coast-to-coast freed houses of worship in numerous states, including Kentucky, Illinois, Maine, Virginia, and California, from discriminatory COVID-19 restrictions. Several of these cases reached the United States Supreme Court and resulted in injunctions prohibiting discriminatory COVID-19 restrictions on religious worship. For example, our case against California and its Governor Gavin Newsom resulted in a permanent injunction against them, see *Harvest Rock Church, Inc. v. Newsom*, 141 S. Ct. 1289 (2021), and a subsequent final judgment requiring them to pay Liberty Counsel **\$1,350,000** in attorney's fees and costs. See *Harvest Rock Church, Inc. v. Newsom*, No. 2:20-cv-06414, C.D. Cal. (May 14, 2021).

In Illinois, Liberty Counsel achieved a settlement on behalf of employees of NorthShore Health who had been subjected to unlawful discrimination on the basis of their religious beliefs about the COVID injections, amounting to **\$10,300,000**. See *Jane Does 1-13 v. NorthShore University HealthSystem*, No. 1:21-cv-05683, N.D. Ill. (December 23, 2022).

These cases reflect a sample of our legal victories on behalf of our many clients. Additional examples may be reviewed at <https://lc.org/cases>.

ADDITIONAL FACTS & LEGAL ANALYSIS

It is not our intent by this letter to upset you further; but we are extremely serious about protecting [TEEN MOTHER]'s legal rights and the right of her unborn child – [REDACTED] - to life. You are both risking estrangement from [TEEN MOTHER] who may not forgive you for forcing her to have an abortion.

As difficult and upsetting to you as this situation around [TEEN MOTHER]'s pregnancy may be at this time, there is hope and help for your [REDACTED] [TEEN MOTHER] and you.

If you comply with the steps outlined above, Liberty Counsel will assist [TEEN MOTHER] (and your family) by contacting allied policy organizations and other groups who can provide assistance or direct [TEEN MOTHER] to further resources. You are not alone, and she is not the first to face this issue – there is hope. Positive, healthy outcomes can arise from this situation.

But, you must respect the important new legal rights that [TEEN MOTHER] now possesses as a mother. [TEEN MOTHER] is now the mother of her own child in her womb. [REDACTED] she is a mother now, regardless of the circumstances.

As a mother, **TEEN MOTHER** has the fundamental Constitutional right to direct the upbringing and education of her child. *Pierce v. Society of Sisters*, 268 U.S. 510 (1925). That right is hers – not anyone else’s. Although you as **TEEN MOTHER**’s parents still have the legal duty to care for **TEEN MOTHER** and protect, and provide for her, **TEEN MOTHER** has the right to make decisions about the child in her womb, your grandchild.

No one (including you or any other person) may force, coerce, or pressure **TEEN MOTHER** into having an abortion. To do so could subject you to the criminal charge of fetal homicide (killing a baby while still in the womb) in Florida and the many other states with fetal homicide laws. In other words, any third party (including a relative) who causes the baby to be killed may be guilty of fetal homicide. You may also be prosecuted under the Federal Unborn Victims of Violence Act (18 U.S.C. § 1841), which makes it a federal crime, in certain circumstances, for anyone to kill a baby in the womb against the mother’s wishes.

Under the general laws of the states, minors have the capacity and legal right to consent to all medical care related to the pregnancy, including: prenatal, delivery, and post-natal care, for her and her child. See, e.g., Fla. Stat. § 743.065 (giving unwed pregnant minor mother right to consent to the performance of medical or surgical care or services relating to her pregnancy); N.M. Stat. § 24-1-13.1 (giving the mother the sole right to consent to an abortion); Miss. Code § 41-41-3 (giving the mother the right to consent to pregnancy-related care). **That includes the decision to bear her child and not abort, if that is her desire.**

Because *Dobbs v. Jackson Women's Health Org.*, 142 S. Ct. 2228 (2022), has overturned *Roe v. Wade*, abortion is now illegal many states, including Florida after 6 weeks gestation. See Fla. Stat. § 390.0111 et seq. However, **it is illegal in every state for you (or anyone) to force, coerce, or unduly pressure **TEEN MOTHER** into having an abortion.** Such action may result in civil liability and/or criminal prosecution for persons involved.

The vast majority of states have fetal homicide laws that prohibit anyone (including relatives) from killing a baby in the womb when the mother of that child wants the baby to live. For example, Virginia Code § 18.2-32.2 (killing a fetus punishable by imprisonment up to 40 years); California Pen. Code § 187 (definition of murder includes “fetus”). Courts have upheld these laws. For example, *Lawrence v. State*, 211 S.W.3d 883 (Tex. App. – Dallas 2006); *Ex parte Phillips*, 287 So. 3d 1179 (Ala. 2018). Congress also passed the Federal Unborn Victims of Violence Act set forth above.

You may not force, coerce, or exert undue pressure upon your **TEEN MOTHER** to have an abortion. Such action may also subject you to reporting and prosecution for child abuse, as set forth above. Besides possible criminal prosecution, both you and the abortionist could be held liable for various civil torts, such as medical battery, negligence, wrongful death, intentional infliction of emotional distress, or other claims.

Common examples of force, coercion, or undue pressure may include, but are not limited to, any of the following:

1. **“If you have this baby, I am kicking you out of my house.”** (This violates your duty under State law to care for **TEEN MOTHER** until she reaches the age of majority.) You do not have to support her child, but you do have to support **TEEN MOTHER** just as she has to support her child. She also has the right to child support from the father of the

child. You and/or she may be eligible for financial assistance from the state and other groups.

2. **“No more talking; I am taking you for an abortion. I have made the appointment.”**
You may continue to make parenting decisions for her, but not any decisions related to prenatal care, abortion, or the birth of her child. Keeping the baby is her choice alone.
3. **“You are my child, and you will do what I say. You will have the abortion.”**
4. **“I will beat you within an inch of your life, if you don’t get an abortion.”** (Any threat or infliction of violence is unlawful.)
5. **“You are grounded, cut off, and stranded, (or any other punishment) for not choosing to abort.”**

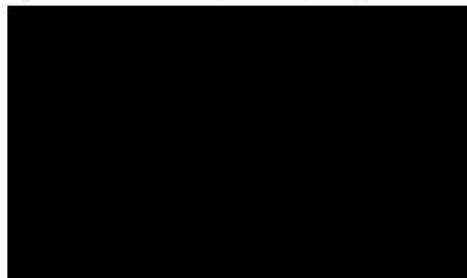
CONCLUSION

Liberty Counsel provides our services at no charge to those in need. We have heard from many women, who have been forced or pressured to have abortions, that they suffered years of devastation.

Due to the concerns raised by **TEEN MOTHER’s report, our organization is prepared to file a lawsuit to protect **TEEN MOTHER**’s rights, as well as utilize our press office to draw media attention to this matter, because you are coercing her to get an abortion, which is against the law. A lawsuit or media attention in the process of protecting **TEEN MOTHER**’s right to be free from a forced abortion would be a national news story. The Florida Office of the Attorney General will also be a powerful ally for **TEEN MOTHER**. To prevent the need for further action by us, we ask you to please **provide a written response to Liberty Counsel by [REDACTED] today, November 1, 2025, that **FAMILY MEMBER** has:****

1. **Cancelled the abortion appointment (screenshots are acceptable).**
2. **Cancelled the plane tickets (screenshots are acceptable).**
3. **Committed to cease and desist from engaging in any threats, emotional abuse, coercion, or any other form of manipulation or physical abuse to coerce **TEEN MOTHER** into traveling out of Florida to receive an abortion.**

If Liberty Counsel does not receive this response from you by **[REDACTED]** today, we will take additional action to prevent irreparable harm to **TEEN MOTHER**’s rights.



[REDACTED]
[REDACTED]