

PROFITING FROM DECEIT

How Google Profits From Anti-Choice Ads Distorting Searches For Reproductive Healthcare

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The Center for Countering Digital Hate is a US-headquartered international nonprofit NGO that disrupts the architecture of online hate and misinformation.

Digital technology has forever changed how we communicate, build relationships, share knowledge, set social standards, and negotiate and assert our societies' values.

Digital spaces have been colonized, and their unique dynamics exploited by malignant actors that instrumentalize hate and misinformation. These movements are opportunistic, agile, and confident in influencing and persuading people.

Over time these malignant actors, advocating diverse causes – from hatred of women to racial and religious intolerance to denial of science – have formed a digital Counter– Enlightenment. The disinformation they spread to bolster their causes has socialized the offline world for the worse.

The Center's work combines both analysis and disruption of these networks. CCDH's solutions seek to increase the economic, political, and social costs of all parts of the infrastructure – the actors, systems, and culture – that support and profit from hate and misinformation.

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1

INTRODUCTION

Google is betraying the trust of hundreds of thousands of Americans seeking reproductive healthcare and services.¹ Instead of providing accurate results to people who search for "abortion clinics near me", Google is directing them straight towards those who wish only to delay and prevent their care using deceptive practices.

This report demonstrates the scale of deceptive advertising by anti-choice groups, fake healthcare clinics and the marketing infrastructure that underpins the spread of their medical misinformation, in a post-Dobbs digital environment.

Fake reproductive health clinics – sometimes called Crisis Pregnancy Centers – appear to offer independent advice on reproductive healthcare but are actually run by ideological organizations who try to shame those seeking services such as abortions, and employ scare tactics based on medical misinformation and lies.

Although they purport to offer independent advice and genuine reproductive healthcare, in reality they aim to intercept people and prevent them from exercising their right to good advice and services.

They are the cornerstone of the anti-choice movement, which we have found spends four times as much on Google Search ads for deceptive fake clinics than it does on Google Search ads for their constitutionally-protected right to campaign to restrict abortion care.²

This report reveals that fake clinics have spent a combined \$10.2 million on search ads over the last two years.³ 71% of those clinics use deceptive means, such as advancing false claims that abortions are linked to cancer and other diseases.⁴ 38% of these clinics do not carry disclaimers on their homepage making it clear that they do not provide abortions.⁵

Among fake clinics with Google Search ads, 40% promote so-called abortion pill "reversal" (APR) – an unproven and unsafe method for reversing a medical abortion.⁶

Despite pledging to ban advertisements of this unproven and unsafe "treatment", following CCDH's September 2021 report, *Endangering Women for Profit* – Google has since taken \$2.6 million in Search ad revenue from such fake clinic websites that promote it.⁷

And by using new tools that open the black box of Google's advertising business, we also show that fake clinics have targeted more than 15,000 different queries related to abortion, including "abortion pill", "abortion clinic", "abortion clinic near me" and "planned parenthood".⁸

These new findings reflect the digital environment that now exists in a post-Dobbs America, where search engines are lifelines for those seeking care and information about their options – which are increasingly scarce.

Google, as the dominant search engine, is therefore also the most effective way of intercepting those seeking reproductive healthcare advice and services. Studies show people have a high degree of trust in search engines, but they also struggle to differentiate organic results from paid-for ads. That's why we're seeing anti-choice groups investing so heavily in misleading digital advertising – and over twice as much in states where abortions are still legal.⁹

Such is the anti-choice lobby's focus on online marketing that an entire industry of specialist consultants has emerged. In the words of one such agency, their mission is to help fake clinics become "wise as serpents, harmless as doves".¹⁰



Every Google results page is as highly curated as a TV commercial break or a magazine's ads page. The difference is that carefully designed algorithms determine who is featured most prominently, and who is overlooked. In the case of reproductive healthcare, Google is selling the virtual equivalent of prime real estate to the highest bidder, and the highest bidder is often a fake clinic.

Google is a willing participant and supporter of the fake clinic industry, profiting from – and even subsidizing – the anti-choice lobby's campaigns. It is the lynchpin of a multi-million dollar fake clinic industry that works around the clock to deprive Americans of medical assistance by deceptive means.

Reform is urgently needed. In line with CCDH's STAR Framework, legislators must demand a standard of safety by design, transparency, accountability and responsibility from Google's monopolistic Search business.

This means holding Google to its promises on disclaimers that provide vital transparency information to those seeking healthcare, and empowering regulators to step in to prohibit misleading advertising on reproductive healthcare.

Google and the anti-choice movement must not be allowed to continue to betray Americans seeking reproductive healthcare advice and services. The first step is to dismantle the vast, powerful digital advertising architecture that has been so effectively weaponized to deprive them of their rights.

Imran Ahmed

CEO, Center for Countering Digital Hate •

2. EXECUTIVE SUMMARY

FAKE CLINICS USE DECEPTION TO PREVENT PEOPLE FROM ACCESSING ABORTION CARE:

- ► The anti-choice movement has established thousands of fake clinics across the US.¹¹
- Fake clinics use deception to pose as real abortion clinics, aiming to attract people seeking abortions and prevent them from accessing care.¹²
- Training materials produced by anti-choice marketing firms admit that fake clinics are targeting "abortion-determined" people who are "not looking for a pregnancy center".¹³

GOOGLE SEARCH IS THE PRIMARY MEANS BY WHICH FAKE CLINICS DECEIVE PEOPLE SEEKING ABORTIONS:

- ► Anti-choice marketers say Google Search is the top source of referrals to fake clinics.¹⁴
- Google Search ads placed by fake clinics target users searching for phrases like "abortion clinic near me" with deceptive ads intended to look like real clinics.¹⁵
- Google has enabled a cottage industry of anti-choice marketing firms that help fake clinics target abortion-seekers and even apply for ad subsidies from Google.¹⁶

GOOGLE MADE AN ESTIMATED \$10.2 MILLION FROM ADS FOR FAKE CLINICS IN THE LAST TWO YEARS:

- Estimates from the enterprise analytics tool Semrush show that fake clinics spent \$10.2 million on Google Search ads over the last two years.¹⁷
- Fake clinics ads targeted over 15,000 different queries related to abortion, including "abortion pill", "abortion clinic", "abortion clinic near me" and "planned parenthood".¹⁸
- The anti-choice movement spent four times as much on Google Search ads for fake clinics than it did on Google Search ads for overt campaigns to restrict abortion care.¹⁹
- ▶ Fake clinics in states where abortion is legal spent twice as much as those with bans.²⁰

71% OF FAKE CLINIC WEBSITES ADVERTISED BY GOOGLE USE DECEPTIVE TECHNIQUES:

- Researchers analyzing fake clinic websites advertised on Google Search found that 71% used at least one deceptive technique to mislead abortion-seekers.²¹
 - 1. 16% promote misleading claims linking abortion to harms such as cancer²²
 - 2. 38% fail to carry homepage disclaimers stating they do not provide abortions²³
 - 3. 40% promote so-called abortion "reversal", a potentially dangerous procedure²⁴
- At least one anti-choice marketing firm offers website templates for fake clinics that have disinformation about abortion built into them by default.²⁵
- Since promising not to run ads for abortion "reversal" in September 2021, Google made an estimated \$2.6 million from ads for fake clinic websites promoting the procedure.²⁶

GOOGLE MUST STOP ENABLING A FAKE CLINIC INDUSTRY BUILT ON DECEIVING PEOPLE SEEKING ABORTIONS:

- Google must demand transparency from fake clinics running ads:
 - 1. Fake clinics must carry "does not provide abortions" disclaimers on all ads
 - 2. Fake clinic websites must display clear disclaimers
 - 3. Google should end Ad Grants for deceptive fake clinic websites
- ► Google should highlight and prioritize genuine abortion clinics in search results.
- Lawmakers should empower the FTC to prohibit misleading advertising on abortion.

3. GOOGLE FACILITATES A FAKE CLINIC INDUSTRY THAT MISLEADS PEOPLE SEEKING ABORTIONS

This report reveals how Google profits from allowing anti-choice organizations to distort search results for abortions with misleading ads for anti-abortion fake clinics.²⁷

It makes Google the lynchpin of a multi-million dollar fake clinic industry that works around the clock to mislead and misdirect Americans who are seeking access to abortion care.²⁸

Using new tools that open the black box of Google's advertising business, we show that Google is directing hundreds of thousands of people searching for information about abortions and pregnancy to misleading fake clinic websites, and making millions of dollars in ad revenue in the process.²⁹

We also outline how in our view Google's tolerance of these misleading ads has given rise to a cottage industry of predatory marketing firms that promise to help anti-choice organizations misdirect "abortion-determined" people to fake clinics – and even get subsidized by Google to do so.³⁰

FAKE CLINICS USE DECEPTION TO STOP PEOPLE FROM ACCESSING ABORTION CARE

Anti-abortion fake clinics – also known as "crisis pregnancy centers" – pose as genuine reproductive health clinics to capture the attention of abortionseekers, but are actually run by anti-choice organizations with a very different agenda: to oppose abortion and dissuade, deter, and shame people looking for abortion care.³¹

While they present themselves as medical clinics, these facilities are unregulated, meaning they

have no legal obligation to provide pregnant people with accurate information.³² Instead, staff at fake clinics have been found to impede access to comprehensive, ethical care by using deception, emotional manipulation, delay tactics and disinformation, undermining key principles of informed consent and patient autonomy.³³

The contempt for abortion-seekers inherent in this strategy stretches back to the first-ever fake clinic set up in Honolulu in 1967, whose founder said that a woman who wants to terminate her pregnancy "has no right to information that will help her kill her baby".³⁴

Today, such facilities operate at scale in the US, playing a central role in the anti-choice movement. There are an estimated 2,600 operating across the country, meaning they now outnumber genuine clinics by a factor of 3 to 1.³⁵ Many are affiliated with national anti-choice organizations such as the National Institute of Family and Life Advocates (NIFLA), Care Net and Heartbeat International, which provide them with funding, support and training.³⁶

Anti-choice fake clinics go by many names. The anti-choice movement often refers to them as "crisis pregnancy centers", "pregnancy resource centers" or "pregnancy help centers".³⁷ But they have become known as "anti-abortion fake clinics" or "fake clinics" amongst reproductive rights organizations and the media, owing to their deceptive agenda.³⁸ We refer to them as "fake clinics" throughout this report. At the core of fake clinics' strategy of dissuading abortion is deception.³⁹ This starts online, where fake clinics pose as genuine reproductive health clinics to capture the attention of abortion-seekers.

In particular, fake clinics have discovered that they can insert themselves into abortion-related queries on Google Search via ads.⁴⁰ Research suggests that these ads can include text falsely implying that they provide abortions, when in reality they do not.⁴¹

If and when abortion-seekers are lured into visiting a fake clinic in person, the deception then continues offline. Fake clinics often go to great lengths to mirror the appearance of genuine clinics, such as by using medical language, wearing lab coats and asking people to fill intake forms like those in a doctor's office.⁴² But instead of receiving medical advice, users are bombarded with disinformation and grossly exaggerated claims about the risks of abortion.⁴³

GOOGLE IS INSTRUMENTAL IN FAKE CLINICS' STRATEGY OF MISLEADING ABORTION-SEEKERS

Google Search is a leading source of information on abortion, with Americans making an estimated 102 million searches for queries related to abortion each year.⁴⁴

One anti-choice marketing firm studied by this report states that intake forms filled out by visitors to fake clinics reveal that Google is now their top source of referrals.⁴⁵

Google dominates the online search market in the United States, commanding a market share of 87%.⁴⁶ Users also have a high degree of trust in search engines: 73% believe that most or all of the information they find in search is accurate and trustworthy.⁴⁷ Users have a particularly high level of trust in the top-ranked results provided by search engines, even where they are less relevant or less credible than lower-ranked results.⁴⁸

This is important because ads placed on Google Search appear at the top of the page when people use Google to search the web, deliberately resembling organic search results. Studies have shown that up to 68% of users are unable to distinguish these ads from organic search results.⁴⁹

Accordingly, many users who turn to Google Search to find information encounter Google ads at the top of search results and consider the information they contain to be credible.

It is for all these reasons that we infer that fake clinics are placing ads on Google Search in a bid to target and influence users searching for accurate information about abortion. These attempts to distort search results for terms like "abortion clinic near me" with misleading ads for fake clinics have become central to the digital strategy employed by anti-choice organizations.

Research by the Center for Countering Digital Hate and others has shown that Google has allowed its search results to become saturated with misleading ads for fake clinics:

- Nearly 28% of ads on Google Search results for abortions in "Trigger Law" states are for fake clinics.⁵⁰
- 37% of Google Maps results for abortion clinics in "Trigger Law" states are actually fake clinics⁵¹
- As of 2014, 79% of fake clinic ads implied they provide abortions and other medical services.⁵² In 2022, Google was again shown to be allowing ads from fake clinics falsely suggesting they would provide abortions.⁵³
- Many fake clinic ads do not carry disclaimers warning they do not offer abortions.⁵⁴

 Low-income abortion-seekers, who are less likely to be able to travel for abortion care, are disproportionately targeted with ads from fake clinics.⁵⁵

Reports have identified people misled by ads into visiting fake clinics that aim to frustrate their access to an abortion.⁵⁶ In one case, a 19-year-old woman's search for an abortion clinic on Google led her to a fake clinic where she was told, inaccurately, that abortions were linked to infertility and breast cancer.⁵⁷

In some cases, Google is subsidizing fake clinics to place ads. This report shows that at least one anti-choice marketing firm helps fake clinics access Google's Ad Grant scheme which offers non-profit organizations up to \$10,000 a month in free ad credits.⁵⁸

CASE STUDY: CHOOSE LIFE MARKETING ON TARGETING "ABORTION-DETERMINED" PEOPLE

Choose Life Marketing is an anti-choice marketing agency specializing in web design, digital marketing, fundraising and branding for fake clinics. It claims to have served over 600 clients across the US, Canada, Ireland and Taiwan.⁵⁹

ADVISING FAKE CLINICS TO BE "WISE AS SERPENTS, HARMLESS AS DOVES"61

In pursuit of their goal of targeting "abortion-minded" people, Choose Life Marketing recommends a range of marketing tactics to help fake clinics to "show up alongside, or even above, abortion provider information":⁶²

- ► Targeting keywords, e.g. "abortion clinic near me", to appear first on search results⁶³
- ► Using "virtual geofencing" to target visitors to abortion clinics or pill websites⁶⁴
- ▶ Retargeting ads that "follows them [abortion seekers] to other places online"65
- ► Using Snapchat advertising to "meet abortion-minded women"⁶⁶

Other advice from Choose Life Marketing is aimed at improving the "credibility" of fake clinic websites, including "[citing] sources like the Mayo Clinic and FDA" and using "pre-abortion screening language" about "important tests and scans".⁶⁷

Referring to the latter tactic, Choose Life Marketing emphasizes that "this is part of being wise as serpents, harmless as doves" in the design of fake clinic content.⁶⁸

NEW STRATEGIES FOR "COMBATING ABORTION TOURISM"

Choose Life Marketing has produced a tailored guide for "combating abortion tourism" in the wake of the Supreme Court decision to overturn Dobbs, which proposes a dual-pronged strategy to reduce the likelihood of a person receiving healthcare both in states where abortion is banned and those where it is not.⁶⁹

The guide states that fake clinics located in areas where abortion is banned should "encourage [abortion-seekers] to stay in your state" by bidding on "keywords related to the next closest large city where abortions are available."⁷⁰ Meanwhile, fake clinics located in areas where abortion is legal are instructed to "reach women before they head to the abortion clinic" using the techniques outlined above.⁷¹

Guides produced by Choose Life Marketing outline a deliberate strategy of targeting people who are already "abortion-minded" or "abortion-determined", presenting them with ads and search results for fake clinics that "meet [their] real needs".⁶⁰

CASE STUDY: IRAPTURE ADMITS ABORTION-MINDED "NOT LOOKING FOR A PREGNANCY CENTER"

Anti-choice marketing firm iRapture admits that the "abortion-minded teen" that fake clinics are looking to target "is not looking for a pregnancy center".⁷²



The admission is part of a longer video intended to advise fake clinics on how best to target abortionminded teens, and the services that iRapture can offer. Jacob Barr, iRapture's founder, also advises websites featuring "a picture of a baby will probably repel an abortion-minded teen".⁷³

4. GOOGLE MADE AN ESTIMATED \$10.2 MILLION FROM FAKE CLINIC ADS IN THE LAST TWO YEARS

Google made an estimated \$10.2 million from ads for fake clinics over the last two years that were clicked by users an estimated 13 million times, according to CCDH analysis.

Using the enterprise analytics tool Semrush, researchers identified a total of 188 fake clinic websites that placed ads on Google Search in the two years between 1 March 2021 and 28 February 2023.⁷⁴

Analysis of keyword data shows that 84% of these 188 fake clinics have at some time targeted users searching for abortion-related keywords or phrases. The remainder targeted search terms or placed ads more generally related to pregnancy and sexual health.

This shows that the vast majority of fake clinic ads placed on Google Search are targeting users searching for information about abortions. The five most commonly targeted phrases related to abortion were "abortion pill", "abortion clinic", "abortion clinic near me", "abortion pill cost" and "planned parenthood", the name of a genuine abortion provider which ranks as the most targeted phrase of all.

Fake clinics targeted over 15,000 queries related to abortion in total, including more specific queries such as "telehealth abortion pill texas" and "how much is an abortion in california".

FAKE CLINIC SITES SPEND FOUR TIMES AS MUCH ON SEARCH ADS AS OVERT ANTI-CHOICE CAMPAIGNS

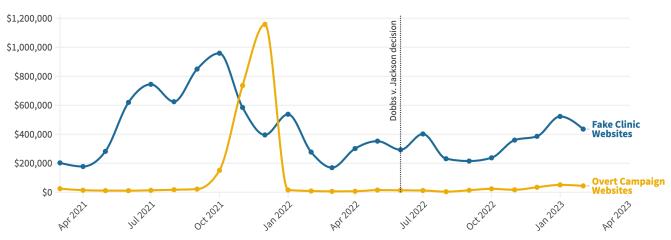
Data from Semrush also allowed researchers to identify eight websites used by anti-choice organizations to overtly campaign against access to abortion care, finding that they spent an estimated \$2.4 million on Google Search ads over the same two-year period.

This reveals that spending on misleading ads for fake clinics is up to four times higher than spending on overt anti-choice campaigns, marking fake clinics as a clear priority for the search advertising strategy of anti-choice organizations in the US.

The anti-choice group Live Action spent the most on overt anti-choice campaigns, spending an estimated \$2.3 million to advertise websites under its control in the period studied.⁷⁵ Previous CCDH research identified Live Action as a major promoter of the unproven and potentially dangerous abortion "reversal" procedure.⁷⁶

FAKE CLINIC SPENDING SPIKED AHEAD OF LANDMARK SUPREME COURT DECISION

An over-time analysis of this data shows that spending by both fake clinics and overt anti-choice campaigns spiked in the run up to the Supreme Court decision Dobbs v. Jackson Women's Health Organization that overturned Roe v. Wade.⁷⁷ But while overt anti-choice campaign spending has since remained low, that of fake clinics has steadily risen over the past year.



Google Search ad spend

Source: CCDH analysis of Semrush

FAKE CLINICS ARE SPENDING TWICE AS MUCH ON ADS TARGETING STATES WHERE ABORTION IS LEGAL⁷⁸

On average, fake clinics based in states where abortion is legal spend over twice as much on Google Search ads as those based in states where abortion is banned.

Researchers were able to determine the physical location of 172 of 188 fake clinics identified as having placed ads on Google Search between 1 March 2021 and 28 February 2023.

These fake clinics are present in 40 US states, including 13 where abortion is currently banned.⁷⁹ Analysis shows that those based in states where abortion is currently legal spent over twice as much on average as fake clinics in states with bans. The difference in total spend is even more stark, with fake clinics in states where abortion is legal spending approximately \$7.3 million on ads in total — more than four times as much as the estimated \$1.6 million spent by fake clinics located in the smaller number of states with bans.

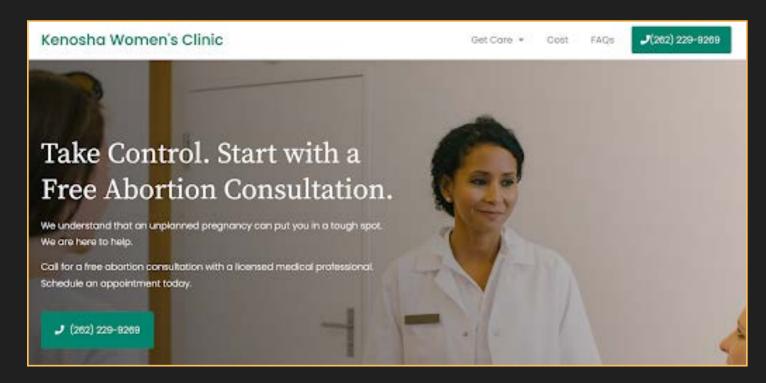
These proportions have remained similar after the Supreme Court's June 24, 2022 decision on Dobbs v. Jackson Women's Health Organization that overturned Roe, with fake clinics in states where abortion is currently legal spending more on average and in total than those in states with bans in place.

This suggests that the anti-choice movement is focusing its resources on ads aimed at misdirecting people who are legally entitled to access abortion care. In a guide on advertising in the wake of the Supreme Court's decision to overturn Dobbs v. Jackson, the anti-choice marketing firm Choose Life Marketing advises fake clinics that they must target people seeking abortions in states where they remain legal and "capture their attention before the local abortion clinic does."⁸⁰ The top three states for fake clinic ad spend were Pennsylvania, North Carolina and California, all of which currently hold abortion to be legal. A table compiling fake clinic spend on Google Search ads broken down by state and time period can be found in Appendix B of this report.

		Post-Dobbs Only		March 2021 - Feb 2023	
	# Clinics	Average	Sum	Average	Sum
Banned	59	\$7,347	\$433,455	\$26,572	\$1,567,722
Legal	113	\$14,577	\$1,647,154	\$65,000	\$7,344,951
Total	172	\$12,097	\$2,080,609	\$51,818	\$8,912,673

CASE STUDY: NETWORK OF NON-EXISTENT FAKE CLINICS HANDED GOOGLE AROUND \$1.1 MILLION

New analysis produced for this report shows that Google made an estimated \$1.1 million from ads from a network of largely non-existent fake clinics over the last two years.



In 2022, The New York Times exposed a network of fake clinic websites run by Human Coalition, an organization whose mission is to "remove the stain of abortion from America".⁸¹ Reporters showed that the network was largely made up of websites for non-existent fake clinics that had no presence on the ground and were designed instead to channel abortion-seekers to an anti-choice call center.⁸² When users reached out to the number on the websites, they were put through to an anti-choice counselor operated by Human Coalition.

Analysis of ad spending for this report shows that websites matching those identified by the Times have together spent an estimated \$1,134,963 on Google Search ads between 1 March 2021 and 28 February 2023. One such website is shown in this screenshot.⁸³

5. 71% OF FAKE CLINIC WEBSITES ADVERTISED ON GOOGLE SEARCH ARE MISLEADING

Analysis of fake clinic websites advertised on Google Search shows that 71% employ misleading techniques, such as promoting misleading narratives about abortion.⁸⁴

Researchers assessed each of the 188 fake clinic websites that this report identified as running ads on Google Search in the last two years, finding that:

- 16% promote misleading narratives on their websites
- 38% have no homepage disclaimer stating that they don't provide abortions
- 40% promote the unproven abortion "reversal" procedure

In total, 133 out of 188 websites – equivalent to 71% – utilized one or more of the above techniques, demonstrating the misleading nature of most fake clinic sites advertised on Google Search. The following sections examine how fake clinic websites employed these techniques.

16% OF FAKE CLINIC WEBSITES PROMOTE MISLEADING NARRATIVES ABOUT ABORTION

16% of the 188 fake clinics running ads on Google Search promoted at least one of three misleading narratives about abortions on their websites.

Researchers assessed the websites for three key misleading narratives, finding that:

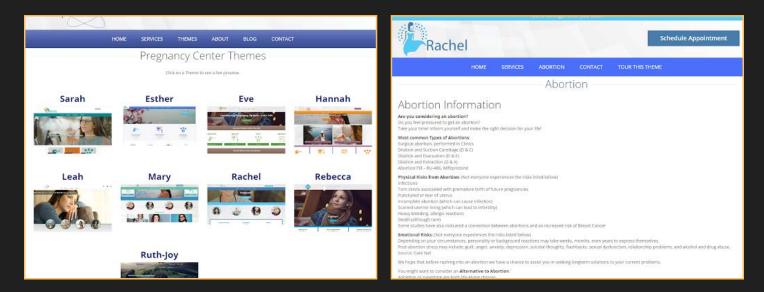
- 10% distorted the mental impact of abortions, including "anxiety" and "thoughts of suicide"⁸⁵
- 7% exaggerated the risk of complications in future pregnancies, including fertility loss⁸⁶
- 3% claimed that abortion can increase the risk of breast cancer⁸⁷

Overall, 31 of the 188 websites contained one or more of the three narratives, despite the fact that the claims have been refuted by multiple sources, including the American College of Obstetricians and Gynecologists and the American Psychological Association. Contrary to the above narratives, they state:

- Abortions do "not increase risk for depression, anxiety, or suicidal thoughts"⁸⁸
- "The preponderance of evidence from welldesigned and well-executed studies shows no connection between abortion and future fertility problems."⁸⁹
- There is no association between induced abortion and breast cancer risk⁹⁰

CASE STUDY: IRAPTURE OFFERS WEBSITE TEMPLATES WITH MISLEADING NARRATIVES BUILT IN

Anti-choice marketing agency iRapture claims to have launched websites for over 200 fake clinics, and offers website templates with misleading narratives built in.⁹¹



iRapture's website shows that it offers a range of service packages to fake clinics, including custom Google ad campaigns, for a cost of up to \$600 a month.⁹² Help documents listed on iRapture's site also reveal that it can arrange for fake clinics to receive web addresses ending ".clinic", ".hospital" or ".healthcare".⁹³

One template website that the agency has named "Rebecca" provides a prewritten template on abortion, detailing the supposed physical and emotional risks from the procedure. The template includes a number of disinformation narratives, including:

- ► Exaggerations of "post-abortion stress", citing "suicidal thoughts" and "drug abuse"⁹⁴
- ► The claim of a "connection between abortions and an increased risk of breast cancer"95
- Exaggeration of scarred uterine lining, "which can lead to infertility"⁹⁶

38% OF FAKE CLINIC WEBSITES HAVE NO DISCLAIMER ON THEIR HOMEPAGE

Researchers found that 38% of fake clinic websites advertised on Google Search fail to include a disclaimer on their homepage stating that they do not provide or refer abortions.

Google policies state that ads for fake clinics on search results should carry a disclaimer stating that the advertiser "does not provide abortions" underneath the content of the ad, but reports have found that these can be overlooked by people seeking abortions.⁹⁷

Researchers checked the homepage of all 188 fake clinic websites identified by this report to assess whether they carried a clear disclaimer stating that they do not offer abortions.

This analysis found that while some of the websites' homepages included disclaimers such as "Obria Medical Clinics do not perform nor refer for abortion services" or "this center does not offer or refer for pregnancy terminations or birth control", a substantial share did not.⁹⁸

72 of the 188 websites, equivalent to 38% failed to carry any kind of disclaimer clarifying that they do not offer abortions on their homepages. While in some cases these fake clinics would state that they do not offer abortions in their terms and conditions, others carried no such statement anywhere on their website at all.⁹⁹

Even in cases where disclaimers were included on the homepage, the statements were often buried within paragraphs of information, making them easy to miss. Reports have shown that even when fake clinic websites contain disclaimers, abortionseekers can still be tricked into visiting them.¹⁰⁰

40% OF FAKE CLINICS PROMOTE SO-CALLED ABORTION PILL "REVERSAL"

Analysis of websites of fake clinics that advertised on Google shows that 40% promote the so-called abortion "reversal" procedure.

Also known as "abortion pill reversal" or "APR", so-called abortion "reversal" is an unproven and potentially dangerous procedure claimed to "reverse" the effects of a medical abortion through the administration of high doses of the hormone progesterone.¹⁰¹

A medical abortion, or medication abortion, is a safe and effective nonsurgical option to end a pregnancy, typically including the use of two medications in succession: mifepristone and misoprostol.¹⁰² This regimen was first approved by the Food and Drug Administration (FDA) in 2000.¹⁰³ Proponents of so-called abortion "reversal" claim, without medical evidence, that an individual can "reverse" the effects of the first pill taken in the process of a medical abortion by ingesting high doses of progesterone and not taking the second pill.¹⁰⁴

Experts from the American College of Obstetricians and Gynecologists have long warned that claims about so-called abortion "reversal" are "not based on science" and are based on "unproven, unethical research." They have also condemned legislative mandates for so-called "reversal" as "dangerous to women's health."¹⁰⁵

In 2019, a study to test the effectiveness of socalled abortion "reversal" was suddenly halted when several participants experienced "dangerous hemorrhaging" that sent them to the hospital."¹⁰⁶ While some states have legislated for so-called abortion "reversal" to be discussed in mandatory

pre-abortion counseling, experts say that there have been no studies that show it is "effective or safe."107 The American Medical Association has previously opposed state mandates where physicians must tell patients abortion is reversible, stating that so-called abortion "reversal" is " unsupported by the best, most reliable scientific evidence."108

Despite this evidence, 76 out of the 188 fake clinic websites identified by this report promote socalled abortion "reversal". Many of these sites link to the dedicated Abortion Pill Reversal website, which claims the procedure has a 64-68% success rate, despite warnings from health authorities.¹⁰⁹

En Español	Get Help Now: 1-877-558-0333					
ABORTION PILL REVERSAL.	Abortion Pill Reversal	The Abortion Pill	About Us	Contact		
The abortion pill is the common name for a chemical abortion process that combines two medications. It is also referred to as medical abortion, self-managed abortion, or DIY abortion. After taking the first pill, some women regret their choice and want to reverse it. That's where abortion pill reversal comes in.						
Using the natural hormone progesterone, medical professionals have been able to save 64-68% of pregnancies through abortion pill reversal.						

6. GOOGLE MADE AN ESTIMATED \$2.6 MILLION FROM SITES PROMOTING ABORTION "REVERSAL"

Fake clinic websites that promote so-called abortion "reversal" on their websites have spent an estimated \$2.6 million on ads despite a promise from Google not to promote the procedure.

Previous research published by the Center for Countering Digital Hate in September 2021 found that ads for abortion "reversal" appeared on 83% of Google searches for abortions.¹¹⁰ These ads could be seen by any user, regardless of their age, and sometimes carried deceptive headlines like "find abortion clinic near me".¹¹¹

In response to this evidence, Google stated that it would "remove any ads promoting abortion reversal pills" and that it prohibits ads containing "unproven medical claims".¹¹²

However, analysis conducted for this report shows that Google has accepted an estimated \$2.6 million to run Google Search ads for fake clinic websites that promote abortion "reversal" since it made this promise. The sum was spent by a total of 72 fake clinic websites that promote abortion "reversal" and placed ads between October 2021 and February 2023.

"We [do] not allow ads with unproven medical claims and remove any ads promoting abortion reversal pills. To ensure full transparency about an advertiser's services, we require all ads that target abortion-related searches to prominently disclose whether they do or do not provide abortions." **Google, 16 September 2021**¹¹³

CASE STUDY: RANKMONSTERS HELPS DECEPTIVE FAKE CLINICS WIN GOOGLE AD GRANTS

In some cases, Google is not just accepting ads from fake clinic websites, but is also providing them with free ad credits to promote themselves.

Quick Links • REFERENCES	Contact Us 301 Main Street, Suite 1B	Disclaimer Alpha Pregnancy Center	A Member of CARE NET.	RankMonsters	OME PRODUCTS CONTACT
TERMS OF USE PRIVACY POLICY BLOG FIND US SUPPORT	Relaterstown, MD 21136 GET DIRECTIONS 410-433-7793	does not offer or refer for pregnancy terminations or birth control. Information the provided as an educational service and should not be relied on as a substitute for professional and/or medical advice.		WELCOME TO RANKMONSTERS DIGITAL MARKETING – THAT WORKS!	We are clients of Rank Monsters and are stark, raving, loony fansl We vetted twelve agencies and theris was the only proposal that made sense both in transparency and pricing. Then the delivery and customer service after we signed on wow, just wowl
Alpha Pregnancy Center (websites for pregnancy c	Copyright © 2023. All RKGHTS RESER enters	WED.	f	SEO PPC GOOGLE AD GRANTS	Matthew Davis Davis Business Law

Google offers non-profit organizations up to \$10,000 a month in free ad credits as well as access to Google's marketing tools to "build effective campaigns".¹¹⁴ Fake clinics are known to take advantage of these grants, with just one network of fake clinics reportedly receiving \$120,000 in Google advertising grants in 2015 alone.¹¹⁵

Helping them to do so is a specialist anti-choice marketing agency called RankMonsters, which offers nonprofit organizations, including fake clinics, consultation services on advertising. On its website, RankMonsters claims to "work with over 400 individual pregnancy centers and Care Net National, who supports 1,100 centers".¹¹⁶

RankMonsters has created a dedicated site to pitch its services to prospective fake clinic clients. Under the title "Google Ad Grants", the business promises "we are one of only a few agencies in the world who can help you qualify for \$10k/mo. in free ad spend."¹¹⁷

A template website for fake clinic clients hosted on the RankMonsters domain carries misleading copy on its homepage stating "if you think you may be pregnant or you are considering abortion, we're here to help."¹¹⁸ The template site's page about abortion promotes the unproven and potentially dangerous abortion "reversal" procedure.¹¹⁹

The same site carries an endorsement from Vincent DiCaro, the Chief Outreach Officer of the fake clinic network Care Net, stating that RankMonsters "proactively and creatively managed our Google Grant".¹²⁰ Google's official Ad Grants website lists RankMonsters as a "Certified Professional Agency" that can help nonprofits apply for ad credits.¹²¹

The screenshot above shows the site of Care Net member Alpha Pregnancy Center whose homepage links to the RankMonsters site.¹²²

7. RECOMMENDATIONS

This report reveals Google's pivotal and lucrative role in helping anti-choice organizations distort search results with misleading ads for anti-abortion fake clinics.

This has the real-world effect of misdirecting people seeking abortions to fake clinics that have every intention of preventing them from accessing care. This represents a failure by Google to be honest with its users and protect them from harm.

It is further evidence that self-regulation of social media platforms means no regulation. To address failures like this, the Center for Countering Digital Hate has created the **STAR Framework** to establish key global standards for social media reform.

Applying principles of the **STAR Framework** to the findings of this report, we propose the following recommendations for Google and for legislators:

- 1. Google must demand transparency from fake clinics running ads:
 - a. Fake clinics must carry "does not provide abortions" disclaimers on all ads
 - b. Fake clinic websites must display clear disclaimers
 - c. Google should end Ad Grants for deceptive fake clinic websites
- 2. Google should highlight and prioritize genuine abortion clinics in search results
- 3. Lawmakers should empower the FTC to prohibit misleading advertising on abortion

S	Safety by Design - social media platforms must ensure that new products and features are safe by design from the outset, before public release.
т	Transparency - social platforms must be open and honest with the public, introducing transparency of data, algorithms, advertising and enforcement.
Α	Accountability - social platforms must be held accountable to democratic and independent bodies charged with enforcing these principles.
R	Responsibility - senior executives must be held responsible for implementing regulations, with consequences for omissions and failings.

1) GOOGLE MUST DEMAND TRANSPARENCY FROM FAKE CLINICS RUNNING ADS

🔵 Transparency

The evidence compiled by this report shows that fake clinic ads and websites frequently fail to state clearly that they do not offer abortions. This has the consequence of misdirecting people searching for abortions to fake clinics, threatening their right to access care safely.

Google can address the harms this causes by demanding **Transparency** from fake clinics:

- Fake clinics must carry "does not provide abortions" disclaimers on all ads. Our research shows that fake clinic ads targeting users searching for some abortion related terms, such as the names of abortion providers, do not carry disclaimers.¹²³ Google must enforce its existing policy and apply these disclaimers consistently.¹²⁴
- Fake clinic websites must display clear disclaimers. Reports have shown that the disclaimers that Google places on some fake clinic ads are easily missed by people seeking abortions.¹²⁵ To improve transparency, Google should require that fake clinics wishing to run ads have clear disclaimers visible on their websites.
- Google should end Ad Grants for deceptive fake clinic websites. Fake clinic websites that fail to carry disclaimers or that promote demonstrably misleading statements about abortion should not be eligible for Google Ad Grants.

2) GOOGLE MUST PRIORITIZE GENUINE HEALTHCARE FACILITIES IN SEARCH RESULTS

🔵 Safety by Design

People using Google Search to find accurate information about abortion care should not be bombarded with misleading ads and results for fake clinics.

Google can address this by applying the principle of **Safety by Design**, highlighting and prioritizing search results for real abortion clinics carrying accurate information.

Healthcare experts have raised concern that antichoice organizations are often unregulated facilities which don't need to adhere to key principles of patient care.¹²⁶

Prioritizing licensed medical facilities for some key word searches would ensure Google users are accessing organizations with a duty of care to patients and access to accurate, science-based information from the outset.

3) LAWMAKERS SHOULD EMPOWER THE FTC TO PROHIBIT MISLEADING ADVERTISING ON ABORTION

🗨 Accountability, Responsibility

The Federal Trade Commission (FTC) has established 'truth in advertising' rules that require marketing communications "truthful, not misleading, and, when appropriate, backed by scientific evidence."¹²⁷

But without a democratic and independent body capable of enforcing these rules — and holding their social media executives responsible where they have failed to do so — these rules cannot address harms caused by demonstrably misleading ads for fake clinics.

In April 2023, New Jersey Senator Bob Menendez introduced legislation to ban false advertising related to abortion services and give the FTC the powers it needs to prosecute false advertisers.¹²⁸ Legislators should look to implement similar legislation in other states.

Healthcare experts have raised concern that antiabortion organizations are often unregulated facilities which don't need to adhere to key principles of patient care.

Prioritizing licensed medical facilities for some key word searches would ensure Google users are accessing organizations with a duty of care to patients and access to accurate, science-based information from the outset.

APPENDIX A: METHODOLOGY

IDENTIFYING ANTI-CHOICE WEBSITES

In total, CCDH identified 976 fake clinic websites and 63 anti-choice overt campaign websites using one of four methods.

- Via Google search results: Researchers conducted Google search queries for the terms "abortion pill" and "abortion clinic near me" and collected the websites of fake clinics returned in search results and search ads. These search queries executed between 19 and 20 July 2022, and were performed across all 50 US states and Washington D.C. via a VPN.
- Via abortion-related search terms: Researchers used the enterprise analytics tool Semrush to identify websites advertising on search terms relating to abortion.
- 3. Using digital markers: The list of websites identified using the first two methods was expanded by identifying additional websites with key digital similarities. For each website, researchers used the online investigation tool DNSlytics to return other websites running from the same IP address or containing the same Google Analytics IDs. This process revealed several clusters of interconnected websites, many of which were also part of the online ecosystem of anti-choice websites.

4. Identifying known actors in the anti-choice space: Researchers identified the websites of known actors in the anti-choice space, including all large organizations that have actively campaigned against abortion in the US.

Fake clinic websites were identified based on comparison with existing databases of fake clinics, analysis of website content and links to known anti-choice organizations.

QUANTIFYING GOOGLE AD SPEND BY ANTI-CHOICE WEBSITES

To quantify the amount spent by the 1,039 anti-choice websites on Google search ads, researchers used Semrush, an enterprise analytics tool. For each website, researchers used Semrush to gather estimates of spending on Google search ads spanning two years between 1 March 2021 and 28 February 2023.

Out of the list of 1,039 anti-choice websites, Semrush provided evidence that 196 had actively run Google search ads during the time period covered, including 188 fake clinics and eight overt campaigns. This leaves 843 websites which had either zero spending or minimal spending that was not picked up by Semrush.

APPENDIX B: FAKE CLINIC SPEND BY STATE AND TIME PERIOD

This table presents data on estimated Google Search ad spend from the enterprise analytics tool Semrush for the 172 fake clinics that researchers were able to link to a physical location.

Total spend figures are from the period between 1 March 2021 and 28 February 2023. Semrush provides monthly figures for estimated Google Search ad spend, so "Pre-Dobbs" refers to the period from 1 March 2021 up to June 2022 inclusive, as the Supreme Court decision on Dobbs v. Jackson Women's Health Organization that overturned Roe v. Wade occurred on June 24, 2022.¹²⁹ Accordingly, "Post-Dobbs" refers to the period from July 2022 to the end of February 2023 inclusive.

Abortion status is taken from the New York Times tracker of state abortion bans.¹³⁰

State	Number of Fake Clinics	Legal Status	Pre-Dobbs (\$)	Post-Dobbs(\$)	Total (\$)
Pennsylvania	7	Legal	2,231,39	38,593	2,269,989
North Carolina	6	Legal	945,747	649,018	1,594,765
California	14	Legal	948,289	392,273	1,340,562
Arkansas	4	Banned	603,083	72,048	675,131
Wisconsin	8	Banned	193,281	257,174	450,455
Georgia	5	Legal	359,862	1,639	361,501
South Carolina	1	Legal	252,356	27,024	279,380
Florida	11	Legal	100,898	106,458	207,356
Kansas	3	Legal	73,608	131,627	205,235
Virginia	3	Legal	125,244	46,422	171,666
Maryland	2	Legal	142,924	98	143,022
Minnesota	7	Legal	79,366	62,231	141,597
Colorado	3	Legal	11,343	129,372	140,715
Massachusetts	4	Legal	122,597	2,461	125,058
Illinois	13	Legal	117,486	7,175	124,661
Tennessee	6	Banned	99,063	3,530	102,593
New York State	3	Legal	90,664	8,807	99,471
Alabama	2	Banned	27,750	59,729	87,479
Texas	11	Banned	71,891	8,744	80,635
Michigan	6	Legal	43,199	32,967	76,166
West Virginia	3	Banned	64,273	0	64,273

State	Number of Fake Clinics	Legal Status	Pre-Dobbs (\$)	Post-Dobbs(\$)	Total (\$)
Kentucky	8	Banned	42,734	3,962	46,696
Ohio	9	Legal	33,207	7,632	40,839
Missouri	5	Banned	22,159	13,355	35,514
Washington	2	Legal	11,345	715	12,060
Louisiana	3	Banned	8,422	660	9,082
Mississippi	2	Banned	643	8,286	8,929
Nevada	1	Legal	6,326	0	6,326
Idaho	2	Banned	59	3,961	4,020
Indiana	2	Legal	1,059	1,826	2,885
South Dakota	2	Banned	333	1,267	1,600
Oklahoma	3	Banned	576	739	1,315
New Jersey	2	Legal	39	731	770
lowa	3	Legal	332	42	374
Nebraska	1	Legal	174	27	201
New Mexico	1	Legal	173	0	173
Hawaii	1	Legal	72	0	72
Maine	1	Legal	54	16	70
Utah	1	Legal	27	0	27
Oregon	1	Legal	10	0	10
Grand Total	172		6,832,064	2,080,609	8,912,673

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