



**TIM GRIFFIN**  
ATTORNEY GENERAL

July 29, 2025

c/o Jill Smith  
Vice President of Operations  
Possibility Labs  
1410 Franklin St. #135  
San Francisco, CA 94109

Re: Notice of Cease and Desist

Dear Ms. Smith:

The Office of the Arkansas Attorney General (“OAG”) is the state’s chief consumer advocate and law enforcement officer. To fulfill these duties, the OAG is empowered to investigate business practices and to enforce consumer protection laws where violations exist.

Recently, the OAG received information that Plan C, which is a project of Possibility Labs, is advertising that certain medical pills that induce abortions may be obtained in all States, including Arkansas. The OAG independently reviewed Plan C’s website and verified this allegation.

Abortions are prohibited in Arkansas pursuant to Ark. Code Ann. § 20-16-1304 *et seq.*, except for specific, extenuating circumstances. Moreover, Ark. Code Ann. § 20-16-1504 specifically makes it a crime “to provide any abortion-inducing drug via courier, delivery, or mail service.” Consequently, abortion pills may not legally be shipped to Arkansas.

Furthermore, Plan C’s website states that “[a]bortion pills are very safe.” A recent study, however, found that “real-world insurance claims data for 865,727 prescribed mifepristone abortions” shows “a serious adverse event rate of 10.93 percent.” Jamie Bryan Hall & Ryan T. Anderson, *The Abortion Pill Harms Women: Insurance Data Reveals One in Ten Patients Experiences a Serious Adverse Event*, Ethics and Public Policy Center (Apr. 28, 2025), <https://tinyurl.com/wxhfswdf>.

Based on this information, it appears that some of your business practices may constitute false, deceptive, and unconscionable trade practices under the Arkansas Deceptive Trade Practices Act, Ark. Code Ann. § 4-88-101 *et seq.* (“ADTPA”). The Attorney General of Arkansas demands that you **IMMEDIATELY CEASE AND DESIST** from conducting any advertising related to the delivery of abortion drugs into the State of Arkansas. If you refuse to comply, a formal investigation will be opened. Additionally, the Attorney General may bring a lawsuit against you for violations of the ADTPA. If successful, you may face civil penalties up to \$10,000 per violation.

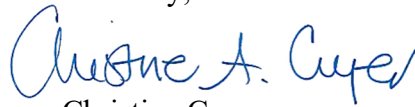
BOB R. BROOKS JR. JUSTICE BUILDING  
101 WEST CAPITOL AVENUE  
LITTLE ROCK, ARKANSAS 72201

To avoid further action, please notify the OAG of the steps you have taken to remedy this situation within 14 days of the date of this letter. Your response should be in writing and addressed to:

Office of the Arkansas Attorney General  
c/o Christine Cryer  
101 West Capitol Avenue  
Little Rock, AR 72201

Alternatively, you may provide your response by email to [Christine.Cryer@ArkansasAG.gov](mailto:Christine.Cryer@ArkansasAG.gov). You may also use this email address to communicate any questions or concerns about this letter.

Sincerely,

A handwritten signature in blue ink that reads "Christine A. Cryer". The signature is fluid and cursive, with the first name "Christine" being the most prominent part.

Christine Cryer  
Deputy Attorney General