

July 29, 2025

<u>VIA CERTIFIED MAIL</u> 7007 1490 0002 5725 8146

Cloudflare 101 Townsend Street San Francisco, CA 94107

Re: Notice of Cease and Desist

To Whom It May Concern:

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 indicating that Cloudflare is hosting LifeEasyOnPills.org, a website that facilitates the sale of medical pills that induce abortions to consumers in Arkansas. The OAG independently reviewed this website and verified the 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, LifeEasyOnPills.org states that these abortion pills, "can safely be used for up to 8 weeks." 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 LifeEasyOnPills.org's 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"). Consequently, the Attorney General of Arkansas demands that you **IMMEDIATELY CEASE AND DESIST** from hosting websites or otherwise facilitating LifeEasyOnPills.org within the state of Arkansas. If you refuse to comply,

a formal investigation will be initiated. 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.

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 <u>Christine.Cryer@ArkansasAG.gov</u>. You may also use this email address to communicate any questions or concerns about this letter.

Sincerely,

Christine Cryer

Deputy Attorney General

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Internal File No. 408143