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STATE OF NORTH DAKOTA
OFFICE OF ATTORNEY GENERAL

STATE OF NORTH DAKOTA EX REL. DREW H. WRIGLEY, ATTORNEY GENERAL, Petitioner, -vs- PRAIRIE ABORTION FUND, Respondent.	CEASE AND DESIST ORDER, NOTICE OF CIVIL PENALTY AND NOTICE OF RIGHT TO REQUEST A HEARING CPAT 250164.001

To each of the individuals and entities identified below (hereinafter "Respondent"):

PRAIRIE ABORTION FUND
512 1ST AVE N
FARGO ND 58102-4804

PRAIRIE ABORTION FUND
PO BOX 2018
FARGO, ND 58107-2018

(including all those entities' officers, directors, owners, agents, servants, employees and representatives as well as all other persons in active concert or participation with them, extending to all "doing business as" names, formal corporate names, fictitious names of any kind or any variations of the same)

INTRODUCTION

1. Respondent Prairie Abortion Fund ("Respondent" or "Prairie Abortion Fund") is engaged in the unlawful, deceptive, and dangerous practice of advertising, promoting, and facilitating the sale of drugs, namely Abortion Pills, that are counterfeit, misbranded, unlawful, untested, unapproved, or sold in an unlawful manner. The Attorney General has a reasonable basis

to believe Prairie Abortion Fund has engaged in, and is engaging in, acts or practices declared unlawful by N.D.C.C. ch. 51-15, *Unlawful Sales or Advertising Practices* ("the Consumer Fraud Law"). Prairie Abortion Fund's conduct poses a risk to public health and safety, violates North Dakota law and established public policy, and must cease.

2. The advertisement, sale, and dissemination of counterfeit, unapproved, or untested drugs that are falsely represented as safe or generic versions of brand name drugs presents a serious risk to the health and safety of the people of North Dakota. Consumers may unwittingly purchase and consume an unsafe or ineffective product, or a product that has unknown effects, contains unknown ingredients, or contains ingredients different in nature, concentration, or dosage from what is represented or what is expected or understood by the consumer. This business practice can injure the health and safety of the consumer and, in this case, a fetus the consumer may be carrying.

3. The sale of counterfeit, unapproved, or untested drugs is an unlawful and dangerous practice, and the misrepresentations accompanying the sale of such products makes a consumer unable to reach an informed decision regarding the purchase, consumption, or use of the product because the illegality of the product as well as risks associated with consuming the product, is misrepresented, disguised, or distorted.

4. Further, the sale of mifepristone and misoprostol ("Abortion Pills") without a prescription and through a website that requires little information from the consumer, and the online (over the counter) sale of a drug that by law can only be administered in the physical presence of a physician, is both unlawful and potentially dangerous to the health of consumers. See N.D.C.C. ch. 14-02.1, *Abortion Control Act.*

5. The sale of unapproved and untested Abortion Pills to consumers causes the introduction of unapproved new drugs into U.S. and North Dakota commerce in violation of the

Food Drug and Cosmetic Act, 21 U.S.C. § 201 et seq., and the North Dakota Food, Drug and Cosmetic Act, N.D.C.C. § 19-02.1-16. By promoting the sale of unapproved and untested Abortion Pills to North Dakota consumers, Prairie Abortion Fund is facilitating the introduction and sale of misbranded drugs in violation of 21 U.S.C. § 331(a) and N.D.C.C. § 19-02.1-02.

6. Prairie Abortion Fund's advertisement, promotion, and facilitation of the sale of an unlawful product or the unlawful sale of a product, is just as dangerous and unlawful as the sale itself. As a North Dakota nonprofit corporation, Respondent's referral and active link to websites that sell unlawful products or unlawfully sell a product, lends credibility and trustworthiness to websites that otherwise would look much more suspicious to the consumer. Consumers generally know that there is a myriad of untrustworthy and fraudulent websites out there that could be selling unlawful, harmful, or non-existent products. By linking and recommending a website's offerings, Prairie Abortion Fund provides consumers with a reason to trust a website, thereby assisting, facilitating, and supporting purchases by North Dakota consumers through the linked website. Further, by advertising, promoting, and facilitating the sale of unlawful products or the unlawful sale of a product, Prairie Abortion Fund implies and represents that the product is lawful and can be lawfully sold in the State of North Dakota, which is false.

7. After investigating Prairie Abortion Fund's business practices and reviewing different Abortion Pills Prairie Abortion Fund is promoting or facilitating the sale of through their website, the Attorney General alleges that Prairie Abortion Fund is engaged in deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation, with the intent that others rely thereon in connection with the sale or advertisement of any merchandise, in violation of N.D.C.C. §51-15-02, and is providing assistance or support to a person engaged in an act or practice in violation of N.D.C.C. §51-15-02 while knowing or consciously avoiding knowing that person is engaged in such an unlawful act or practice, in violation of N.D.C.C. §51-15-02.3, including by:

a) Promoting and facilitating the unlawful sale of counterfeit, unapproved, untested, misbranded, or misrepresented products,

b) Promoting and facilitating the unlawful introduction of new drugs into North Dakota commerce,

c) Facilitating and assisting the unlawful sale of products without a required prescription,

d) Facilitating and assisting sales of Abortion Pills that are misbranded, including not in compliance with the Mifepristone REMS Program,

e) Promoting, facilitating, and assisting in the unlawful online sale of products that may not be administered without the supervision of a physician, and

f) Promoting, facilitating, and advising the unsupervised use of products required to be administered under the supervision of a physician.

All unlawful sales promoted by Prairie Abortion Fund are falsely disguised as lawful sales.

8. Therefore, it appears to the Attorney General that Prairie Abortion Fund is, or has, engaged in violations of the Consumer Fraud Law, N.D.C.C. §§ 51-15-02.3 and 51-15-02.

9. It is necessary and appropriate in the public interest and for the protection of the people of North Dakota to restrain Prairie Abortion Fund's unlawful acts or practices. *See* N.D.C.C. §51-15-07.

BACKGROUND

10. Prairie Abortion Fund is a North Dakota nonprofit corporation with a principal place of business at 512 1st Ave N, Fargo, ND 58107-2018. Prairie Abortion Fund was established in 2023. Prior to 2023, Prairie Abortion Fund operated as North Dakota Women In Need (WIN) Abortion Access Fund, a North Dakota nonprofit corporation established in 1999. Prairie Abortion

Fund represents itself as a registered 501(c)(3) nonprofit and a member of the National Network of Abortion Funds (NNAF), which is a registered 501(c)(3) nonprofit organization. Prairie Abortion Fund is an abortion fund serving North Dakotans, South Dakotans, Minnesotans, and people who travel to this region for abortion care. Prairie Abortion Fund operates the website at https://www.prairieabortionfund.org, which has been operational since at least March of 2024.

11. In August of 2025, the Attorney General received information suggesting that Prairie Abortion Fund is engaged in promoting and facilitating the unlawful sale of products through its website https://www.prairieabortionfund.org, including Abortion Pills (containing the drugs mifepristone and misoprostol and often called MTP kits or Mifegest Kit). Concerns were raised that the Abortion Pills sold on websites promoted and linked by Respondent were counterfeit, untested, unapproved, misbranded, or sold without a required prescription and for unsupervised use in violation of law.

12. Prairie Abortion Fund's website contains a "Resources" tab which leads to a Resources subpage which displays the heading "Preparedness and Support." Under the heading is the following text: "We have compiled a list of ***vetted and evidence-based organizations*** who exist to help you navigate your abortion." (emphasis added)

13. The first resource on the Resources subpage is "Find and Abortion Provider."

14. The second option under "Find and Abortion Provider" is "Plan C - Provides information and resources for people seeking abortion pills."

15. The phrase "Plan C" contains a hyperlink to the Plan C website that offers "Abortion pills by mail in every state." Selecting North Dakota in the drop down menu leads to a subpage with the title "Where People Get Abortion Pills Online in North Dakota." This subpage provides information and a link to online clinics that mail Abortion Pills, international online

clinics, websites that sell Abortion Pills, community network that mails Abortion Pills, and the ability to search for in-person clinics.

16. The third option under "Find and Abortion Provider" is "Self-Managed Abortion; Safe and Supported - If a person wants to use abortion pills to end an unwanted pregnancy, with ***or without a clinician***, this website provides information about how to do that based on the World Health Organization" (emphasis added). The phrase "Self-Managed Abortion; Safe and Supported" contains a hyperlink to a website which provides information on how to use Abortion Pills to end an unwanted pregnancy.

17. On August 28, 2025, the Attorney General's Bureau of Criminal Investigations ("BCI") accessed Prairie Abortion Fund's website, https://www.prairieabortionfund.org, and subsequently selected the link it provides to "Plan C." BCI selected "North Dakota" in the search drop down window and navigated to "Websites That Sells Pills."

18. Two examples of the companies promoted as "websites that sell pills" were ybycmeds (https://ybycmeds.com) and Pill Pulse (https://pillpulse.org). For each site, under the link "MORE INFORMATION" it states: "**About this provider -** Website that states that it sells abortion pills (often called MTP kits or Mifegest Kit). The pills we received had the same active ingredients as in the FDA-approved abortion pills available through US clinics, but the manufacturers are not certified or inspected by the FDA. Our laboratory testing of similar products received from online websites found them to be real products of acceptable quality."

19. BCI selected and clicked on the company called "ybycmeds" offering "1 mifepristone plus 14 misoprostol" to "All" ages for $67 and delivery in 3-6 business days. The offer on Plan C's website further stated: "Medically safe, possible legal risk." When selecting the ybycmeds link, a small pop up advised that BCI was leaving the Plan C website, and BCI selected "Continue" and was directed to an ybycmeds landing page displaying an offer to purchase a

"Pregnancy Kit – Abortion pill kit with 1 mifepristone plus 14 misoprostol" for $67. BCI clicked "ADD TO CART" and proceeded to click on the "CHECKOUT" option. The checkout process required entry of billing and shipping details, including name, address, phone number, and email address. The purchaser must then click a box acknowledging that the purchaser has read and agreed to the website's terms and conditions and select PayPal or Debit or Credit Card as payment method. Using a pre-paid debit card, BCI entered the payment information on the card and clicked "Pay $67.00." The purchase was then confirmed.

20. The product ordered from ybycmeds was shipped with a label created in Sanborn, New York on August 29, 2025, and was delivered to BCI on September 2, 2025. The return address for this package was listed as "S2L LLC, Ste E, 6420 Inducon Dr W, Sandborn, NY 14132-9025."

21. BCI selected and clicked on a company called "Pill Pulse" offering "1 mifepristone plus 14 misoprostol" to "All" ages for $58 and delivery in 5-9 business days. When selecting the Pill Pulse link, a small pop up advised that BCI was leaving the Plan C website, and BCI selected "Continue" and was directed to a Pill Pulse landing page displaying an offer to purchase a "MTP KIT COMBO + Misoprostol" for $58. BCI clicked "ADD TO CART" and was directed to the shopping cart. By clicking the button to "Proceed to Checkout," BCI was redirected to a checkout page requiring contact information, including email address, name and shipping address. Under Payment method it stated: "Please reply choosing Zelle, PayPal, Cash App, Venmo, Bitcoin and we will share you details." Without entering payment information, BCI clicked "Place Order" and was redirected to a confirmation page stating "Thank you. Your order has been received." Upon completion of the purchase on the website, BCI received an email from "contact@pillpulse.org" at the email address entered in the purchase process. The email stated "To ensure timely delivery of your MTP Kit + Extra Miso, please let us know if you would like to proceed with payment. Once we receive your confirmation, we can promptly finalize your order and dispatch the product.

We look forward to hearing from you at your earliest convenience". BCI responded that "PayPal" would be the method of payment and upon sending the "PayPal ID" BCI received a request on PayPal from a "Hitesh Vaswani" for $78.00. BCI sent $78.00 to the user via PayPal, obtained confirmation of payment sent, and sent a screenshot of the successful payment to "contact@pillpulse.org." Subsequently, BCI received notification of the purchase along with a United States Postal Service tracking number.

22. The product ordered from Pill Pulse was received by BCI on September 22, 2025, after a tracking label was created on September 17, 2025, in Lincoln, Nebraska. The return address for this package was listed as "FemFitRX LLC, PO BOX 23202, Lincoln, NE 68542-3202." Pill Pulse's website listed a phone number with a +91 country code, which is a country code assigned to India.

23. Neither of the two websites selected by BCI required any information outside of a name, email, phone number, billing and shipping address, to complete the purchase. A purchaser is not asked to answer any health questions, provide a prescription, verify identity, or disclose their age. There was no age or identity verification during the entire purchasing process for either website.

24. These online sellers are operating in direct violation of the *Abortion Control Act,* N.D.C.C. ch. 14-02.1, the North Dakota Food, Drug and Cosmetic Act, N.D.C.C. chapter 19-02.1, and the Consumer Fraud Law, N.D.C.C. chapter 51-15.

25. By promoting, facilitating, and assisting the unlawful sales by these online sellers, and by promoting the unlawful dissemination and administration of Abortion Pills, outside the supervision of a qualified medical provider, and the sale of untested, unapproved, and misbranded drugs, Prairie Abortion Fund is violating N.D.C.C. chapter 51-15.

PRODUCTS PROMOTED BY PRAIRIE ABORTION FUND

26. As set forth above, BCI purchased Abortion Pills ("the Products") from two different websites linked on the Plan C website promoted by Prairie Abortion Fund.

27. The ybycmeds Abortion Pills were received in a sealed shipping envelope which contained a white box. The white box contained a sheet of paper and two blister packages containing what appeared to be pills. The sheet of paper displayed "how to use abortion pills" and provided information on how to take the included pills as well as possible side effects. One blister package was labeled "Combipack of Mifepristone Tablets IP & Misoprostol Tablets IP" and appeared to contain five separate pills. The other blister package was labeled "Misoprostol Tablets IP 200 mcg" and appeared to contain ten separate pills.

28. The Pill Pulse product was received in a sealed shipping envelope and contained two blister packages that appeared to contain pills. One blister package was labeled "Combipack of Mifepristone Tablets IP & and Misoprostol Tablets IP" and appeared to contain five pills and the other blister package was labeled "Misoprostol Tablets IP 200 mcg" and appeared to contain ten separate pills.

29. The Products were sent to the Attorney General's Crime Laboratory Division for limited analysis under the test and techniques available to the Crime Laboratory Division.

30. Fortunately, the limited tests administered indicate that at least some of the tablets contained the represented content mifepristone, and no controlled substances were identified in any of the Products.

31. The Crime Laboratory Division does not have a test available to verify whether the dosage strengths of the Products are as represented on the website and labeling.

APPLICABLE LAW

32. The Abortion Control Act, N.D.C.C. §14-02.1-03.5(2) makes it "unlawful to knowingly give, sell, dispense, administer, otherwise provide, or prescribe any abortion-inducing drug to a pregnant woman for the purpose of inducing an abortion in that pregnant woman, or enabling another person to induce an abortion in a pregnant woman, unless the person who gives, sells, dispenses, administers, or otherwise provides or prescribes the abortion-inducing drug is a physician, and the provision or prescription of the abortion-inducing drug satisfies the protocol tested and authorized by the federal food and drug administration and as outlined in the label for the abortion-inducing drug."

33. Further, N.D.C.C. §14-02.1-03.5(5) requires that when "an abortion-inducing drug or chemical is used for the purpose of inducing an abortion, the drug or chemical must be administered by or in the same room and in the physical presence of the physician who prescribed, dispensed, or otherwise provided the drug or chemical to the patient."

34. Mifepristone is only lawfully available in the U.S. through a REMS program. When the Food and Drug Administration (FDA) reviewed and approved the original new drug application for Mifeprex (mifepristone) in 2000, it concluded that certain restrictions were necessary to ensure the safe use of the drug. These restrictions were approved as a risk evaluation and mitigation strategy (REMS) in 2011 and have been modified since then. Mifeprex and the approved generic version of Mifeprex are subject to a single, shared system REMS, known as the Mifepristone REMS Program. This program sets the requirements that must be followed to ensure safe use of both Mifeprex and the approved generic version of Mifeprex. Under the Mifepristone REMS Program, these requirements include:

a) Mifepristone must be prescribed by a health care provider that meets certain qualifications and is certified under the Mifepristone REMS Program.

b) To become certified to prescribe mifepristone, health care providers must complete a Prescriber Agreement Form.
c) The Patient Agreement Form must be reviewed with and signed by the patient and the health care provider, and the risks of the mifepristone treatment regimen must be fully explained to the patient before prescribing mifepristone.
d) The patient must be provided with a copy of the Patient Agreement Form and the mifepristone Medication Guide (FDA-approved information for patients).
e) Mifepristone may only be dispensed by or under the supervision of a certified prescriber, or by a certified pharmacy on a prescription issued by a certified prescriber.
f) To become certified to dispense mifepristone, pharmacies must complete a Pharmacy Agreement Form.
g) Certified pharmacies must be able to ship mifepristone using a shipping service that provides tracking information.
h) Certified pharmacies must ensure mifepristone is dispensed to the patient in a timely manner.[1]

35. The federal and state food, drug, and cosmetic laws, 21 U.S.C. § 352(f)(l) and N.D.C.C. § 19-02.1-14(7), provide that a drug is misbranded if it fails to bear adequate directions for its intended use(s). The sale of mifepristone without complying with the FDA's Mifepristone Risk Evaluation and Mitigation Strategy (REMS) is a violation of 21 U.S.C. § 352(f)(l) and N.D.C.C. § 19-02.1-02. Further, 21 U.S.C. § 352(f)(2) and N.D.C.C. § 19-02.1-14(7) provides that a drug is misbranded if it fails to bear "adequate warnings against use ... where its use may be dangerous to health, or against unsafe dosage or methods or duration of administration or application .... "

36. Abortion Pills are drugs within the definition of 21 U.S.C. § 321(g) and N.D.C.C. § 19-02.1-01(8) because they are intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease and/or because they are intended to affect the structure or function of the body. Unapproved Abortion Pills are new drugs as defined by 21 U.S.C. § 321(p) and N.D.C.C. § 19-02.1-01(16), because they are not generally recognized as safe and effective for their labeled

[1] https://www.fda.gov/drugs/postmarket-drug-safety-information-patients-and-providers/questions-and-answers-mifepristone-medical-termination-pregnancy-through-ten-weeks-gestation

use. New drugs may not be legally introduced or delivered for introduction into interstate commerce without prior approval from the FDA, as described in 21 U.S.C. § 355(a). See N.D.C.C. § 19-02.1-16.

37. The Consumer Fraud Law, N.D.C.C. ch. 51-15, *Unlawful Sales or Advertising Practices*, makes it unlawful to make false or deceptive claims or statements, express or implied, in connection with the advertisement or sale of merchandise. N.D.C.C.§ 51-15-02 prohibits the "act, use, or employment by any person of any deceptive act or practice, fraud, false pretense, false promise, or misrepresentation, with the intent that others rely thereon in connection with the sale or advertisement of any merchandise, whether or not any person has in fact been misled, deceived, or damaged thereby."

38. N.D.C.C. § 51-15-02.3 provides that "deceptive act or practice" includes the act of providing assistance or support to any person engaged in any act or practice in violation of N.D.C.C.§ 51-15-02 while knowing or consciously avoiding knowing that the other person is engaged in an act or practice in violation of N.D.C.C.§ 51-15-02.

LEGAL AUTHORITY

39. When it appears to the Attorney General that a person has engaged in, or is engaging in, a practice declared to be unlawful, the Attorney General, without notice and hearing, may issue any cease and desist order, which the Attorney General deems necessary or appropriate in the public interest. N.D.C.C. §51-15-07.

40. The enforcement of the state's laws prohibiting deceptive and misleading advertisement and promotion of products, including counterfeit, misbranded, unapproved and untested drugs, unauthorized dispensing of drugs, the unlawful administration of drugs, and the misrepresentation of products is crucial to protecting the health and safety of all North Dakota residents.

41. Prairie Abortion Fund is engaged in acts and practices that are deceptive, misleading, unlawful, and dangerous to health and safety. It is knowingly assisting or supporting companies that are engaged in unlawful acts or practices. It is unlawful to offer and sell Abortion Pills that are misbranded, counterfeit, untested, or unapproved by the FDA, and it is deceptive to - expressly or impliedly - represent such products as a lawful product. When advertising and promoting products to consumers, Prairie Abortion Fund impliedly represents that sale of the product is lawful and that the product sold is safe and legal, and this representation is false.

42. The lack of testing and FDA approval of the Abortion Pills sold through the Plan C website prevent consumers from knowing the exact content of the drugs they are purchasing and makes it impossible for consumers to reach an informed decision whether to purchase, consume, or use the products. Paired with Prairie Abortion Fund's misrepresentations that the seller is a "vetted and evidence-based organization[]," consumers may be deceived into trusting that the seller's product is safe and lawful. Further, Prairie Abortion Fund is promoting the dispensing and use of a product in a manner that is prohibited by law. Its conduct is, therefore, a risk to consumer health and public safety.

43. Without testing and approval of a drug, no one can know for certain what the ingredients are in the drugs promoted by Prairie Abortion Fund, or whether the drugs are produced and processed in a safe and sanitary facility that prevents contamination.

44. It appears to the Attorney General that Respondent is engaged in repeated or continuing violations of North Dakota law by:

a) Misrepresenting - expressly or impliedly - that sale of a product is lawful and that the product sold is safe and legal, when it is not,

b) Facilitating and assisting the unlawful sale of Abortion Pills without a required prescription,

c) Facilitating and assisting sales of Abortion Pills that are not approved by the FDA and that are misbranded, including not in compliance with the Mifepristone REMS Program,

d) Promoting and facilitating the unlawful introduction of new drugs into North Dakota commerce,

e) Promoting, facilitating, and assisting in the unlawful online sale of products that may not be administered without the supervision of a physician, and

f) Promoting, facilitating, and advising the unsupervised use of products required to be administered under the supervision of a physician.

45. Prairie Abortion Fund is assisting and facilitating a scheme to circumvent the North Dakota laws that regulate the sale of products and the sale, prescription, dispensing, and administration of Abortion Pills, and its conduct violates North Dakota law and established public policy.

46. Based on Respondent's continued violation of North Dakota law, it is necessary and appropriate in the public interest to order Prairie Abortion Fund to cease and desist the unlawful conduct. *See* N.D.C.C. §51-15-07. In addition to being unlawful, Respondent's conduct poses a risk to health and safety and must cease.

ORDER

47. NOW, THEREFORE, IT IS ORDERED pursuant to N.D.C.C. § 51-15-07 that Respondent, its officers, directors, owners, agents, servants, employees, contractors, representatives (extending to all "doing business as" names, formal corporate names, aliases, fictitious names of any kind or any variations of the same), as well as all other persons in active concert or participation with it, whether directly or indirectly, and acting through any other business entity, immediately CEASE AND DESIST from (1) promoting, linking, or referring individuals to organizations or websites that are engaged in unlawful acts or practices, (2) advertising or promoting unlawful products, (3) advertising or promoting products that are sold in an unlawful manner, (4) assisting or facilitating the sale of unlawful products, (5) assisting or facilitating the unlawful sale, dispensing, use, or administration of products, (6) making misrepresentations in connection with the advertising and promotion of products, including products offered by third parties, and (7) engaging in any other violations of N.D.C.C. chs. 51-15.

48. YOU ARE NOTIFIED that pursuant to N.D.C.C. § 12.1-09-03 a person is guilty of a criminal offense if the person intentionally "alters, destroys, mutilates, conceals, or removes a record, document, or thing with intent to impair its verity or availability" in an official proceeding. As such, intentional destruction of any documents related to this matter may result in criminal prosecution.

NOTICE OF CIVIL PENALTIES

49. YOU ARE FURTHER NOTIFIED that pursuant to N.D.C.C. § 51-15-07 any violation of this Cease and Desist Order is subject to civil penalties not to exceed $1,000 per violation. Any violation of this Order that also is a violation of N.D.C.C. ch. 51-15 may result in additional civil penalties of not more than $5,000 per violation. Nothing in this Order is intended to limit or waive any rights and remedies available to the State of North Dakota or its residents.

NOTICE OF RIGHT TO REQUEST HEARING

50. YOU ARE NOTIFIED that pursuant to N.D.C.C. § 51-15-07 you may request a hearing before the Attorney General if such a request is made in writing WITHIN TEN (10) DAYS AFTER THE RECEIPT OF THIS ORDER. Respondent has the right to be represented by legal counsel at the hearing at Respondent's expense.

Dated this 16th day of January, 2026

STATE OF NORTH DAKOTA
Drew H. Wrigley
Attorney General

BY: _____

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