



# Executive Summary:

## Risk Landscape Report: Abortion Drugs

This report provides a comprehensive overview of the evolving regulatory environment, online sales trends, and associated risks surrounding abortion drugs—primarily mifepristone and misoprostol—with a focus on the United States and select international jurisdictions.

In the U.S., the regulatory landscape has become increasingly complex following the 2022 Supreme Court decision in *Dobbs v. Jackson Women's Health Organization*, which shifted abortion regulation to the state level. This has led to a fragmented legal environment, with some states enforcing strict bans while others have enacted "shield laws" to protect providers serving out-of-state patients. Compounding this landscape is the ongoing scrutiny of the FDA's Risk Evaluation and Mitigation Strategies (REMS) for mifepristone. Although the Supreme Court dismissed a major challenge to the FDA's authority in 2024, continued legal battles, particularly from state governments, highlight the persistent uncertainty surrounding access and regulation.

### Key Findings

#### Online Availability and Associated Risks

In response to new restrictions, demand for abortion drugs has increased online—both via legitimate telehealth providers and illicit channels. LegitScript has observed the rise of:

- Rogue internet pharmacies offering abortion drugs without prescriptions.
- Foreign-based telehealth providers operating in legal gray zones.
- Websites using deceptive tactics to mask the sale of unapproved or misbranded drugs.

A significant concern is the potential for patient harm due to unverified sourcing, lack of medical oversight, and misinformation.

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**"Given the rapidly changing nature of the abortion medication landscape and the greatly reduced access for many women, illicit sellers of these drugs have noticeably increased online," Abortion Drugs Risk Landscape Report, Q1 2025**

### International Risk Zones

The report identifies several countries with high-risk regulatory environments and thriving black markets:

- Republic of Korea: Mifepristone remains unapproved, but illicit sales persist via messaging apps like KakaoTalk and Telegram.
- Brazil: Despite a long-standing abortion ban, misoprostol (marketed as Cytotec) is widely available through underground networks and social media.
- Indonesia: Abortion is criminalized, yet abortion drugs are marketed using evasive language and informal e-commerce channels.

These jurisdictions are heavily targeted by illicit online sellers and require ongoing monitoring.

### Content Moderation Challenges

Illicit sellers are increasingly leveraging social media platforms and content evasion tactics, such as:

- Misspelled keywords and drug names (e.g., "ab0rtion," "Miffeppristone")
- Redirecting users to sales via WhatsApp or Telegram
- Using legitimate-seeming websites to mask illegal activity

The line between informational content and promotional content is often blurred, complicating enforcement for platforms and regulators.

### Role of LegitScript

LegitScript plays a critical role in identifying, monitoring, and classifying online risks related to abortion drugs. The organization's intelligence capabilities help platforms and regulators stay ahead of illicit sellers and adapt to a rapidly evolving landscape.

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