



June 27, 2022

The Honorable Michael Watson
Secretary of State
401 Mississippi Street
Jackson, Mississippi 39201

Dear Secretary Watson:

In accordance with provisions governing Section 41-41-45, Mississippi Code Annotated, I have determined that on Friday, June 24, 2022, the United States Supreme Court overruled the decision of *Roe v. Wade*, 410 U.S. 113 (1973). In its opinion in *Dobbs v. Jackson Women's Health Organization*, No. 19-1392, the Court held that "rational-basis review is the appropriate standard" for constitutional challenges to state abortion regulations. It is my determination that it is reasonably probable under rational-basis review that Section 41-41-45 would be upheld by the Court as constitutional were it challenged.

Please note that in accordance with 2007 Miss. Laws Ch. 441 (S.B. 2391), which requires this posting to the Mississippi Administrative Bulletin, oral proceedings as contemplated by SOS APA Form 001, are not appropriate.

Sincerely,

A handwritten signature in black ink that reads "Lynn Fitch". The signature is written in a cursive style with a large, stylized "L" and "F".

Lynn Fitch
Attorney General
State of Mississippi