

BOOK REVIEW: NO CHOICE: THE DESTRUCTION OF ROE V. WADE AND THE FIGHT TO PROTECT A FUNDAMENTAL AMERICAN RIGHT BY BECCA ANDREWS, WEIDENFELD & NICOLSON, GREAT BRITAIN, 2022

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I. SETTING THE CONTEXT

On June 24, 2022, the Supreme Court of the United States (SCOTUS) issued a landmark ruling,¹ that significantly altered the landscape of abortion rights in the country. This ruling, which overturned nearly fifty years of precedent,² sparked immediate nationwide protests,³ and ignited an intense debate about the future of reproductive freedoms and the extent of permissible state authority in regulating abortions.⁴ These protests and debates have not died down nearly two years later.⁵

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¹ *Thomas E Dobbs v. Jackson Women's Health Organization* 2022 SCC OnLine US SC 9 : 213 L Ed 2d 545 : 597 US 215 (2022).

² *Roe v. Wade*, 1973 SCC OnLine US SC 20 : 35 L Ed 2d 147 : 410 US 113 (1973).

³ SCOTUSblog, 'Demonstrators Converge Outside Supreme Court After Dobbs Decision', (SCOTUSblog, 2022) <<https://www.scotusblog.com/2022/06/demonstrators-converge-outside-supreme-court-after-dobbs-decision/>> accessed 26 August 2024.

⁴ Elaine Kamarck, 'The Abortion Issue in the 2022 Midterms — Unlike Any Other Issue', (Brookings, 2022) <<https://www.brookings.edu/articles/the-abortion-issue-in-the-2022-midterms-unlike-any-other-issue/>> accessed 27 August 2024; Andy Sullivan, 'Explainer: How Abortion Became a Divisive Issue in U.S. Politics', (Reuters, 2022), <<https://www.reuters.com/world/us/how-abortion-became-divisive-issue-us-politics-2022-06-24/>> accessed 27 August 2024.

⁵ Geoff Mulvihill, 'Abortion is Still Consuming US Politics and Courts 2 Years After a Supreme Court Draft was Leaked', (AP News, 2024) <<https://apnews.com/article/abortion-dobbs-leak-arizona-florida-kansas-9ee070c3540cb730b251d707e5f98ffc>> accessed 26 August 2024.

In the 6-3 ruling, SCOTUS held that the constitutional right to abortion, as established in *Roe v. Wade* (1973),⁶ and subsequently upheld in *Planned Parenthood v. Casey* (1992),⁷ was wrongly decided and ought to be overturned.⁸

Writing for the majority, Justice Samuel Alito applied the “*history and tradition test*”⁹ - a standard introduced in *Washington v. Glucksberg* (1997),¹⁰ - to hold that the Constitution of the United States did not confer the right to abortion either explicitly or implicitly. Consequently, the Due Process Clause of the Fourteenth Amendment, which *Roe* and *Casey* recognised as the primary source of this right, could no longer be interpreted to entitle such a right.

In their dissent, Justices Breyer, Sotomayor, and Kagan emphasised the significant impact that restricting abortion access would have on women’s lives, particularly those from marginalised communities.¹¹ They argued that forcing women to carry pregnancies to term could turn what was intended to be a joyful experience (“*a wonder*”) into a “*nightmare*”.¹²

In this divisive political-legal landscape, Becca Andrews’ book, *No Choice*, comes forth as a compelling read, offering readers a first-hand account of the *Dobbs* decision’s direct impact on the lives of people impacted the most. The book examines not only the immediate consequences of the ruling but also the historical context of abortion rights in the United States, both before and when *Roe* was still the law of the land. As a journalist who has covered reproductive rights for years, Andrews’ book shifts the focus from the law to the people it governs pregnant individuals, doctors, and activists. By focusing on the challenges, they faced in accessing and providing abortion care over the past several decades, Andrews highlights the human cost of *Dobbs*, echoing the dissent’s concerns about the significant negative impact such a ruling would have on women’s lives.

Even though red states had been chipping away at *Roe* and *Casey* for years, Andrews’ book vividly illustrates the real-world impact of these abortion restrictions by sharing the personal stories of women struggling to access reproductive healthcare. Her reporting helps readers understand the real-world consequences of these policies and builds greater empathy for women, medical professionals, and activists at the forefront of challenging these violent policies. *No Choice* also challenges the majority’s misinterpretation of history. By presenting evidence

⁶ *Roe v. Wade*, (n 2).

⁷ *Planned Parenthood v. Casey* 1992 SCC OnLine US SC 102 : 120 L Ed 2d 683 (1992) : 505 US 833 (1992).

⁸ *Thomas E Dobbs v. Jackson Women’s Health Organization*, (n 1) 231-232.

⁹ *ibid* 231.

¹⁰ *Washington v. Glucksberg* 1997 SCC OnLine US SC 79 : 138 L Ed 2d 772 : 521 US 702 (1997).

¹¹ *Thomas E Dobbs v. Jackson Women’s Health Organization* (n 1) at 362 (Breyer, Sotomayor, and Kagan, JJ., dissenting).

¹² *ibid*.

demonstrating that women have been seeking and obtaining reproductive health-care for centuries as early as 1550 BCE (p. 15) — she effectively calls into question the majority’s claim that there was no historical right to abortion.

II. A REVIEW OF PART ONE: BEFORE ROE

Divided into three parts, the book’s first part, titled ‘*Before Roe*,’ examines the lives of women before the passage of *Roe*. Andrews uses a mix of historical records and interviews to explain the political, social, and legal landscape that existed in the United States (and other parts of the world, albeit very briefly) during that period.

Chapter One begins with a brief historical context-setting. Andrews uses evidence from ancient Greece, Rome, Egypt, and the United States to challenge Justice Alito’s assertion that women did not historically control their bodies. Instead, Andrews highlights that the opposite was true. For millennia, women have been regulating their reproductive health and have been doing so in myriad ways. Even though the United States began regulating abortion from 1821 onwards, before that, common law generally accepted abortion as a fairly routine practice up until ‘quickening’ — an observation also noted by Justice Blackmun in the Court’s opinion in *Roe*.¹³

Chapter Two focuses on Black and Brown women, and Andrews powerfully explains how controlling women’s bodies — whether through forced pregnancy or sterilisation — was a hallmark of slavery. This practice affected not only Black women but also Native American women, who faced similar violations as their lands were colonised by American settlers. Consequently, any discussion of abortion rights must be understood within this historical context of slavery, oppression, and masculinist violence.

Chapters Three to Six then focus on the lives of various women and their collectives, all of whom played key roles in advocating for abortion access before *Roe*. Chapter Three tells the story of four women — the first of whom is Sherry, a rape survivor who, in 1968, travelled from San Francisco to El Paso to obtain an abortion. She was assisted by the Society for Human Abortion (SHA), one of the first abortion rights groups in the United States, founded by Patricia “(Pat)” Maginnis, Rowena Gurner, and Lana Phelan, a group of white women also known as the “*Army of Three*”. Dedicated to aiding women seeking abortion care, Pat, Rowena, and Lana relentlessly advocated for abortion rights by delivering public lectures and by creating and distributing leaflets despite the clear legal risks involved. Throughout their activism, they faced multiple legal challenges, yet they persisted. Defying social norms at that time, they openly discussed female

¹³ *Roe v. Wade* (n 2) at 132.

anatomy, menstruation tracking, different abortion procedures, and, most significantly, shared detailed information with women on how to obtain abortions overseas. This chapter chronicles their activities, highlighting their unwavering commitment to reproductive justice at a time when conversations about legal abortion reform were virtually unheard of.

Chapter Four, set in 1964, tells the story of Heather Booth, a university student who broke the law by helping a friend's sister get an abortion. What started as a one-woman abortion referral service eventually became the Jane Collective, a group of women from diverse backgrounds who worked together under the secret pseudonym '*Jane*' to provide abortion care to those who needed it discreetly. This is the story of the woman behind '*Jane*'. Chapter Five tells the lesser-known story of a group of faith leaders from Christianity and Judaism who ran an abortion referral service called the Clergy Consultation Service on Abortion and Problem Pregnancies (CCS) and Chapter Six tells the story of two young women: Donna McNeil, a Catholic woman whose parents supported her decision to get an abortion after an unintended pregnancy, despite their strong religious convictions; and Loretta Ross, a young Black woman who was raped as a child and, despite being pregnant, chose not to have an abortion. In comparing McNeil's and Loretta's stories, Andrews showcases the centrality of choice and challenges anti-abortion arguments based on faith and religious objections, particularly the belief that abortion is always morally wrong, regardless of circumstances.¹⁴ Andrews emphasises that one can be Catholic and still choose an abortion, and one can be a rape survivor and still decide *not* to have an abortion. By demonstrating the complexity of the issue and centering women's agency, Andrews highlights the need to leave private and personal decisions like these to the discretion of women and their attending doctors.

Chapter Seven, the final chapter in the '*Pre-Roe*' section, tells the story of the woman behind the law itself — Norma McCorvey, also known as '*Roe*,' the plaintiff in the 1973 case. This is a sad story of deception. After all, Norma never sought to be the face of abortion legalisation; all she wanted was an abortion for herself, and yet her lawyers hid this from her when they took on her case. Even as SCOTUS delivered its historic verdict in 1973, it was already too late, Norma had already given birth. Soon after the verdict was announced, the anti-abortion movement took action, and it has been a fight to reclaim women's rights ever since.

¹⁴ See generally, Francis J. Beckwith, *Defending Life: A Moral and Legal Case Against Abortion Choice* (2008).

III. A REVIEW OF PART TWO: THE BEGINNING OF THE END

Part Two of the book, titled '*The Beginning of the End*,' shifts the focus to the fraught period between 1973 and 2021 — the time when *Roe* and *Casey* were the still law of the land, yet the right to abortion was being fundamentally undermined by various forms of laws and court judgments in predominantly red states. The seven chapters in this section explore the impact of these restrictive abortion policies on a range of individuals intimately tied to abortion care and access.

Chapters Eight, Nine, and Ten take readers through Mississippi, Arkansas, Texas, and Alabama — primarily Republican-governed states with laws on the books that significantly made exercising the right to abortion difficult, if not impossible. But Andrews doesn't just share the accounts of women seeking care; she also spotlights the work done by abortion rights nonprofits who help women pay for abortions and navigate these challenging environments with limited funding and external support. We see that under these harsh conditions, the women who suffer the most are typically those with limited means — young students, rape survivors, those from low-income groups, and those suffering from serious medical complications, especially Black, Brown, and queer women. State laws restricting abortions and (Targeted Restrictions on Abortion Providers) TRAP laws in force exist solely to limit access to abortion and intentionally neglect to account for the varied circumstances that make women seek abortion care, including cases like rape and incest. These laws not only put immense pressure on women but also on activists and abortion service providers who must navigate this landscape of constantly changing laws, a lack of predictability, and the looming threat of violence from anti-abortion protesters.

Given that abortion bans and restrictions affect a range of people, it's refreshing that Andrews devotes a series of chapters to medical practitioners. Chapter Eleven profiles two doctors, Dr. Leah Torres and Dr. Aaron Campbell, specifically highlighting the challenges they endured and the stigma they faced for doing their jobs in states hostile to reproductive rights. The focus on medical practitioners continues in Chapter Twelve, where Andrews introduces us to 'clinic escorts' — volunteers who do the seemingly benign work of escorting patients from their cars to the clinic doors amidst a sea of anti-abortion protesters. By highlighting the psychological and emotional safety that these escorts provide to patients, Andrews shows us the great human toll of abortion restrictions and the negative impact that hostile environments have on the overall well-being of those seeking care. From these narratives, it's clear that abortion restrictions put immense pressure on the few abortion clinics in operation in the South and Midwest regions of the United States.

Chapter Thirteen is unique because it highlights two issues that are often neglected in accounts of abortion: the politics of running abortion clinics in

hostile states and the disparate impact of these laws on queer people seeking reproductive care. Andrews shows us the multifaceted challenges that administrative staff and medical practitioners face in these states and demonstrates just how they get compounded when those seeking care come from vulnerable social backgrounds, as in the case of Mar Wood, a twenty-year-old Black non-binary person who sought abortion care in North Carolina. They and their transgender partner faced misogyny, transphobia, and a slew of other obstacles before finally getting the care they needed. The final chapter in this section shifts the focus to the protesters. Andrews speaks to protesters affiliated with the Kansas Coalition for Life to understand their motivations for disrupting abortion services. Why do they believe that abortion is murder, and how do they justify their actions given the clear human toll that abortion restrictions pose on women? We hear from them to gain a more comprehensive understanding of the debate.

IV. A REVIEW OF PART THREE: POST-ROE

How would anyone react if they discovered that a constitutional right they had enjoyed for nearly fifty years was suddenly nullified? Andrews urges readers to consider this question as she explores the challenges faced by abortion clinics, abortion seekers, and activists in the immediate aftermath of the *Dobbs* decision.

It is important to remember that in September 2021— nearly two years before the *Dobbs* ruling — Texas enacted Senate Bill 8 (SB 8), also known as the Texas Heartbeat Act.¹⁵ This law, one of the most restrictive in the country at the time, banned most abortions after six weeks of pregnancy. Due to a legal technicality, this blatantly unconstitutional law remained in effect even after being challenged in the Supreme Court. In *Whole Woman's Health v. Jackson* (2021),¹⁶ SCOTUS refused to block the law. This refusal to intervene was seen by many,¹⁷ as a precursor to what was due to come in *Dobbs*, which is why when SCOTUS eventually did grant certiorari to the Mississippi case, it was clear that *Roe* was at imminent risk of being overturned.

¹⁵ Texas Heartbeat Act, Tex. S.B. 8 (2021) <<https://capitol.texas.gov/tlodocs/86R/billtext/pdf/HB01500I.pdf>> accessed 29 August 2024.

¹⁶ *Whole Woman's Health v. Jackson*, 2021 SCC OnLine US SC 100 : 595 US ____ (2021).

¹⁷ See for example Seema Mohapatra, 'The Supreme Court Revealed a Lack of Respect for Precedent and Women's Health-and it Won't Stop There' *Ms. Magazine* (2021) <<https://msmagazine.com/2021/12/15/supreme-court-texas-mississippi-abortion-womens-health/>> accessed 29 August 2024; John Fritze, 'Abortion: Four Clues the Supreme Court is Heading Toward a Major Shift on Roe v. Wade' *USA Today* (2021) <<https://www.usatoday.com/story/news/politics/2021/12/14/roe-v-wade-supreme-court-signals-major-shift-abortion-rights/6493745001/?gnt-cfr=i&gca-cat=p>> accessed 29 August 2024; Eleanor Klibanoff, 'Key Texas Abortion Opponent Sees Supreme Court Decision as Validation to Keep Fighting' *The Texas Tribune* (2021) <<https://www.texastribune.org/2021/12/12/texas-abortion-law-supreme-court-advocates/>> accessed 29 August 2024.

In Part Three, Andrews illustrates how the consequences of *Dobbs* fell hardest on women, doctors, and activists in states most hostile to abortion states that had effectively outlawed the procedure mercilessly the moment *Roe* fell. The final three chapters and an afterword also challenge readers to reflect on several other key questions: Where did the women's movement go wrong in their fight for reproductive justice? Even though some activists had anticipated *Roe's* demise, why were they not better prepared? With no constitutional right to abortion left and little hope of codification through legislative means, what should be the women's movement's strategy moving forward? Although the book does not provide definitive answers, it encourages readers to deeply consider the ramifications of these concerns in a post-*Roe*, post-*Dobbs* America.

V. REFLECTIONS AND CONSIDERATIONS FOR FUTURE ADVOCACY

A. SOCIETY AND LAW

Scholars of socio-legal studies may not agree on much, but they generally agree that the law is a social construct shaped by societal actors and institutions.¹⁸ One such scholar, Brian Tamanaha, suggests that to better understand the workings of the law, we should adopt an empirical, socio-historical approach that focuses on its social, cultural, economic, political, and technological context rather than merely analysing abstract legal theories.¹⁹ This perspective is echoed by Patricia Ewick and Susan S. Silbey, who, using stories of everyday life, explore the different ways in which people in select parts of the United States engage with and understand the law.²⁰ Through in-depth interviews with over 100 individuals, they found that the same person may express vastly different understandings of law.²¹ Their research specifically highlights that one's social location — encompassing factors such as race, gender, and class serves as a conventional indicator of relative powerlessness and is associated with a resistant consciousness of law. Furthermore, marginalised groups such as the poor and working class, racially and ethnically stigmatised individuals, the physically and mentally disabled, women, children, and the elderly are often least represented in culturally dominant schemas. Because they have the most restricted access to resources, these

¹⁸ See Michael Giudice, 'Chapter 1: Introduction in Social Construction of Law' *Social Construction of Law: Potential and Limits* 1-11 (2020) <<https://www.elgaronline.com/monochap/9781839103216.00006.xml>> accessed 30 August 2024 (where he references Brian Leiter, 'The Demarcation Problem in Jurisprudence: A New Case for Skepticism' (2011) 31 *Oxford Journal of Legal Studies* 663, 666; H L A Hart, *The Concept of Law* (3rd edn, intro L. Green, Oxford University Press 2012) 15; Julie Dickson, *Evaluation and Legal Theory* (Hart Publishing 2001) 17 and Brian Tamanaha, *A Realistic Theory of Law* (Cambridge University Press 2017) 80, 58, 77.

¹⁹ *ibid*, Brian Tamanaha, at 80.

²⁰ See Patricia Ewick and Susan S Silbey, 'Chapter Seven: Mystery and Resolution — Reconciling the Irreconcilable' *The Common Place of Law: Stories from Everyday Life* (University of Chicago Press 1998).

²¹ *ibid*.

groups are more likely to resist the law or at least be acutely aware of its operations and modes of subjugation.²² Therefore, just as Tamanaha emphasises the need to analyse law within its broader social-historical context, Ewick and Silbey illustrate that people's social locations significantly shape how they understand and engage with the law.

Such an approach can help us understand the law and its workings in a more nuanced and comprehensive way. It should be noted that Andrews' work does not engage with academic literature on law and society, which is perhaps understandable given her role as a journalist. This is particularly relevant in light of the book's extensive exploration of how the hegemonic exercise of the legal apparatus impacts women, doctors, and other stakeholders. Examining the connection between theoretical frameworks, such as those proposed by Ewick, Silbey, and Tamanaha, and their practical implications would have added significant depth to the discussion.

B. INDIVIDUAL STORIES

While the book provides a comprehensive historical and social account of the impact of abortion law jurisprudence in the United States, it could benefit from further development by dedicating more attention to the personal stories of those affected by these laws. Some chapters feature multiple individual accounts, which can make it challenging for readers to retain the details and follow the overarching themes of each chapter.

For instance, in Chapter One, Andrews introduces readers to Phaenarete, Socrates' mother who also happened to be a midwife (as referenced in Plato's *Theaetetus*). However, instead of delving deeply into her story, Andrews quickly transitions to the Greek tragedy *Medea* (431 BC), the Old Testament, and then references ancient Rome, Egypt, the Middle East, and North Africa before addressing the United States in both the pre-and post-Civil War eras. This pattern of rapid thematic shifts is evident throughout the book, most notably in Chapter Seven, where Andrews attempts to summarise Norma McCorvey's story in just thirteen pages. Such an approach ultimately glosses over the complexities of the lives of multiple characters, depriving readers of the opportunity to fully engage with their experiences.

Thus, while many narratives in the book are presented as concise summaries, they sacrifice potential richness and nuance for the sake of brevity and broader coverage. Greater attention to these narratives could have significantly enhanced the depth of understanding regarding the legal and personal complexities involved in abortion law across various thematic areas and eras. This lack of

²² *ibid.*

depth can also hinder readers' ability to form a genuine connection with the individuals whose stories are being told. When personal narratives are rushed or fragmented, the emotional weight and significance of each story can be lost, making it difficult for readers to appreciate the broader implications of the issues at hand.

C. THE PRO-LIFE PERSPECTIVE

Perhaps the most interesting aspect of the book is that, despite personally aligning with the '*pro-choice*' perspective, Andrews also includes voices of anti-abortion activists in not one but two chapters: in the Afterword and 'Banned' (Chapter 14). By engaging with them herself, she allows readers to understand opposing viewpoints on the issue with sensitivity. While Andrews does not endorse their positions in fact, she even questions some of their arguments within the chapters — it is important that these perspectives find themselves featured in a book that attempts to provide such a comprehensive account of the human experience with abortion rights as this.

This inclusion is especially important in the hyper-polarised political climate of the United States, particularly in the lead-up to the 2024 presidential election.²³ Given the crucial role media outlets play in shaping public opinion and guiding societal discourse — especially on contentious issues like abortion, Andrews' approach can help foster a more nuanced understanding of the issue. In a 2024 mixed-methods study,²⁴ of two major U.S. news outlets, CNN and Fox News found that while both networks provided factual information about abortion-related events, their portrayals differed significantly in context, angle, sources, and depth of coverage with CNN (the more liberal network) advocating for reproductive rights and bodily autonomy and Fox News (the more conservative network) prioritising conservative voices and maintaining a supportive tone toward '*pro-life*' legislation. Similarly, an older study,²⁵ analysing news and opinion articles containing the term "abortion" published in three major U.S. newspapers in 2013 and 2016 revealed that abortion, despite being a critical health service for women, was not typically framed as a health issue. They found that newspaper coverage frequently failed to contextualise abortion as a safe and common healthcare service. Instead, they primarily framed the issue as a political or moral hot-button topic, reflecting the cultural divisiveness in the U.S. Even when abortion was substantively covered, political narratives tended to dominate, with

²³ Frankovic, K, 'Polarization is Getting Worse: Few See Shared Values With Those in the Other Party' (*YouGov*, 2024) <<https://today.yougov.com/politics/articles/49530-polarization-is-getting-worse-in-us>> accessed 5 October 2024.

²⁴ Xinyu Chang, 'Comparative Analysis of Abortion Coverage in CNN and Fox News from the Perspective of Agenda Setting Theory', (2024) USF Tampa Graduate Theses and Dissertations. <<https://digitalcommons.usf.edu/etd/10174>> accessed 5 October 2024.

²⁵ K Woodruff, 'Coverage of Abortion in Select US Newspapers' (2019) 29(i) *Women's Health Issues* 80-86.

coverage increasing during presidential election years, a trend that is evident again in the 2024 presidential election cycle.

In this context, Andrews' portrayal of abortion as not merely a health issue but also a gender issue, along with her inclusion of the '*pro-life*' perspective, is significant. By engaging with opposing viewpoints, especially those she does not necessarily endorse, she fosters a more productive dialogue and encourages readers to consider the complexities of abortion rights beyond the binary positions often presented by mainstream media.

D. SOCIAL MARGINALISATIONS

Andrews also importantly speaks to the experiences of Black, Brown, and queer people, highlighting the essential role of adopting an intersectional reproductive justice framework,²⁶ that puts the lived experiences of marginalised individuals at the forefront to ensure that everyone—irrespective of their status or income—has the power and resources to control their reproductive choices with minimal to no government intervention. Although the book ends on a solemn note, it offers hope for a better future through its proposal that activists could consider adopting to build a more comprehensive and inclusive advocacy strategy.

VI. CONCLUSION

No Choice offers a valuable exploration of American abortion law through the lens of women, doctors, and activists. While it presents powerful human narratives and a historical overview, it is not comprehensive enough in its legal or historical analysis. For a deeper understanding of the law and politics surrounding abortion bans, readers may, for example, refer to books by Mary Ziegler,²⁷ and Leslie J. Reagan,²⁸ both legal historians specialising in this area. Additionally, Cynthia Gorney's *Articles of Faith*,²⁹ also provides valuable insights from a historical-journalistic standpoint.

While the book *attempts* to offer a comprehensive overview of the impact of abortion laws on people's lives, it could benefit from delving deeper into specific issues, such as the unique experiences of certain marginalised groups or the intersection of abortion rights with other social justice movements in greater detail.

²⁶ Loretta J. Ross, 'Reproductive Justice as Intersectional Feminist Activism', (2017) 19 *Souls* 286–314.

²⁷ M Ziegler, *After Roe: The Lost History of the Abortion Debate* (Harvard University Press 2015); M Ziegler, *Dollars for Life: The Anti-Abortion Movement and the Fall of the Republican Establishment* (Yale University Press 2022).

²⁸ L J Reagan, *When Abortion was a Crime: Women, Medicine, and Law in the United States, 1867–1973, with a New Preface* (University of California Press 2022).

²⁹ C. Gorney, *Articles of Faith: A Frontline History of the Abortion Wars* (Simon & Schuster 2000).

That being said, the book's most compelling aspect lies in its ability to transcend the narrow legal-philosophical debates that often dominate mainstream political discussions on abortion. By presenting the issue from the perspective of those most affected by it, *No Choice* offers a powerful and personal account of the devastating consequences of restrictive abortion laws.

All in all, *No Choice* is a must-read for anyone wanting to better understand why abortion rights are important and why bans don't work. It has long been held that abortion bans don't stop abortions. They only stop safe abortions,³⁰ and the chilling tales in this story narrate just how true that is, albeit only in the American context.

³⁰ Annalies Winny, 'A Year without Roe: Abortion Restrictions and the Threat to Women's Health' (2023) <<https://publichealth.jhu.edu/2023/a-year-without-ro/>> accessed 30 August 2024; Amy Roeder, 'The Negative Health Implications of Restricting Abortion Access' (2024) <<https://www.hsph.harvard.edu/news/features/abortion-restrictions-health-implications/#:-:text=A%20recent%20study%20estimated%20that,dangerous%20than%20having%20an%20abortion>> accessed 30 August 2024.