

Vaccine regulations, as implemented, violate the equal protection clause of the Missouri Constitution.

Article I, Section II of the Missouri Constitution provides that "all persons are created equal and are entitled to equal rights and opportunity under the law." Mo. CONST. art I, § 2. Equal protection of the law means "equal security or burden under the laws to everyone similarly situated; and that no person or class of persons shall be denied the same protection of the laws which is enjoyed by other persons or classes of persons in the same place and under like circumstances." *Kansas City v. Webb*, 484 S.W.2d 817 (Mo. banc 1972) citing *Ex Parte Wilson*, 330 Mo. 230, 48 S.W.2d 919, 921. Equal protection of the laws means that no person or class of persons shall be denied the same protection of the laws which is enjoyed by other persons or other classes in the same place and under like circumstances. *Id.*, citing *Missouri v. Lewis*, 101 U.S. 22, 31, 25 L.Ed. 989.