



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
HEALTH CARE BUREAU

February 1, 2022

**VIA U.S. MAIL AND
ELECTRONIC MAIL**

Alan Dumoff, Esquire
30 Windbrooke Circle
Gaithersburg, Maryland 20879

Re: Front Line COVID-19 Critical Care Alliance

Dear Mr. Dumoff,

Thank you for your letter of January 3, 2022, in which you responded to concerns we raised in our letter of December 13, 2013 regarding Front Line COVID-19 Critical Care Alliance and its representations about ivermectin.

While we appreciate your reply, your letter misconstrues our concerns. First, the FLCCC website misleads patients as to the effectiveness of ivermectin in preventing and treating COVID-19 because the website is replete with references to ivermectin as the best tool in fighting COVID-19. For example, FLCC touts ivermectin as a “wonder drug” that is a “core medication in the prevention and treatment of COVID-19.” <https://covid19criticalcare.com/ivermectin-in-covid-19/>. FLCC even pushes high doses of ivermectin as the “cornerstone” of treatment: “higher doses [of ivermectin] have not only been required, but have demonstrated clinical efficacy. Ivermectin should be kept as the cornerstone of COVID-19 treatments and should be given at higher doses in Delta variant infected patients.” <https://covid19criticalcare.com/new-i-mask-faqs/>.

Then, after hailing ivermectin as a wonder drug, the FLCCC website directs potential patients to links called “how to get ivermectin” <https://covid19criticalcare.com/guide-for-this-website/>, and “Doctors Who Prescribe Ivermectin” <https://covid19criticalcare.com/guide-for-this-website/take-action-and-share-the-infos-with-your-doctor/>. The links lead consumers to a list of physicians in New York and elsewhere <https://covid19criticalcare.com/ivermectin-in-covid-19/covid-19-care-providers/>.

At a minimum, we all recognize that the effectiveness of ivermectin is debated, some studies as to its efficacy have been retracted and/or debunked, and the FDA has not approved ivermectin for use in prevention or treating patients with COVID-19. The deceptive portrayal of ivermectin as an essential component of prevention and treatment, coupled with furnishing consumers with a list of prescribers for the purpose of getting ivermectin, risks misleading the public. The fact that FLCCC disagrees with the findings of federal agencies responsible for drug safety does not mean it may deceptively pitch ivermectin as a cure-all for patients and direct them to “get ivermectin.”

The potential harm to patients is real. As you recognize in your letter, there was a reported fivefold increase in calls to the Poison Control Centers, most of which involved patients consuming large amounts of veterinary forms of ivermectin taken without medical supervision. Yet despite knowing of this harm, FLCC refuses to categorically reject the use of veterinary formulations of ivermectin. In one FAQ that asks whether veterinary ivermectin products are equivalent to human formulations and safe for use, the answer begins with “Yes, the ivermectin formulations in both formulations is pharmacologically equivalent.” While later saying it cannot recommend veterinary formulations, FLCC then says: “we are also not aware of any associated toxicity. Liquid veterinary formulations intended for subcutaneous administration have almost no impurities and can be administered by mouth and thus are likely a safer product.” <https://covid19criticalcare.com/ivermectin-in-covid-19/faq-on-ivermectin/>. FLCCC even provides several FAQs to consumers – not prescribers – about who can take ivermectin and how. These types of gratuitous and dangerous representations should be retracted. Consistent with the representation in your letter that FLCCC shares the FDA’s concern about the use of veterinary forms of ivermectin, FLCCC should state clearly that veterinary forms are not deemed safe for human consumption.

Moreover, the links to the provider list should not include “ivermectin,” and should instead simply use the name of the linked web page, *i.e.*, “Covid-19 Care Providers.” Similarly, in these web pages that direct consumers to providers (such as “Information to Share with Your Doctor”), consumers need to be told that prevention and treatment decisions are – as FLCCC recognizes elsewhere on the website -- “*an important discussion between you and your provider.*” These web pages should also highlight that vaccines are an essential component of patient-provider discussions. Indeed, in its FAQ, FLCCC acknowledges that vaccines “*have shown some efficacy in preventing the most severe outcomes of COVID-19*” and that they “*are part of a multi-modal COVID-19 strategy.*”

We appreciate your attention to these issues, and remind you that the Office of the Attorney General is authorized pursuant to Executive Law § 63(12) and General Business Law Article 22-A to bring suit to enjoin any deceptive acts and practices, and to seek restitution, damages, and penalties of up to \$5,000 per violation (§ 350-d).

Sincerely,



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