

Congress of the United States
House of Representatives

SELECT SUBCOMMITTEE ON THE CORONAVIRUS CRISIS

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<https://coronavirus.house.gov>

October 29, 2021

Dr. Simone Gold
Founder
America's Frontline Doctors
1645 West Valencia Road
No. 109-193
Tucson, AZ 85746-6040

Dear Dr. Gold:

Since shortly after the coronavirus pandemic began, predatory actors have sought to capitalize on the crisis by touting misinformation and using it to market disproven and potentially hazardous coronavirus treatments. America's Frontline Doctors (AFLDS), established in July 2020, offers paid online consultations and prescriptions for drugs like hydroxychloroquine and ivermectin. This operation has reportedly generated millions of dollars in revenue for AFLDS and its partners.¹ While AFLDS is not alone in providing these services, it is reportedly among the top purveyors of questionable treatments nationwide and a prominent source of misinformation related to the coronavirus. I am concerned that efforts by AFLDS and similar groups are endangering American lives and harming our efforts to stop the spread of the virus. I write today to seek information on how AFLDS has profited from these abusive practices and to urge you to stop promoting untested and dangerous claims.

Attempts to monetize coronavirus misinformation have eroded public confidence in proven treatments and prevention measures and hindered efforts to control the pandemic.² Some Americans who have been influenced by misinformation have chosen not to get vaccinated, delayed receiving evidence-based treatment, and ingested unapproved substances in harmful quantities.³ For example, New Mexico health officials recently reported that ivermectin—an anti-parasitic drug widely used in animals that has been touted as a coronavirus treatment by

¹ *How 'America's Frontline Doctors' Sold Access to Bogus COVID-19 Treatments—and Left Patients in the Lurch*, Time (Aug. 26, 2021) (online at <https://time.com/6092368/americas-frontline-doctors-covid-19-misinformation/>); *Network of Right-Wing Health Care Providers Is Making Millions off Hydroxychloroquine and Ivermectin, Hacked Data Reveals*, The Intercept (Sept. 28, 2021) (online at <https://theintercept.com/2021/09/28/covid-telehealth-hydroxychloroquine-ivermectin-hacked/>).

² *Id.*

³ *Id.*; *Poison Control Centers Are Fielding a Surge of Ivermectin Overdose Calls*, National Public Radio (Sept. 4, 2021) (online at www.npr.org/sections/coronavirus-live-updates/2021/09/04/1034217306/ivermectin-overdose-exposure-cases-poison-control-centers).

right-wing media figures—had contributed to the deaths of two coronavirus patients in that state. The Oregon Poison Center reported 25 cases of ivermectin poisoning between August 1, 2021, and September 14, 2021, which resulted in the hospitalization of five patients, including two who were admitted to an intensive care unit. The American Association of Poison Control Centers reported a three-fold increase in ivermectin poisoning this year, with more than 1,440 cases through September 20, 2021.⁴

Misinformation endangers public health and fuels vaccine hesitancy by promoting the false ideas that coronavirus vaccines are unsafe and ineffective and that alternative drugs can prevent or cure coronavirus infections.⁵ By encouraging the use of questionable treatments, advocates for these substances have put American lives at risk and prolonged the pandemic.⁶ New data from the Centers for Disease Control and Prevention (CDC) shows that unvaccinated Americans are more than six times as likely to test positive for the coronavirus and more than 11 times as likely to die of the coronavirus compared to fully vaccinated persons.⁷

AFLDS has profited by facilitating paid telehealth consultations and off-label prescriptions for the purported coronavirus treatments that it promotes online. In January 2021, you publicly stated that AFLDS was making hydroxychloroquine “available for the entire nation,” even though the use of hydroxychloroquine to treat coronavirus infections had been widely discredited. You explained that through AFLDS:

You can consult with a telemedicine doctor, and whether you have COVID or you don't have COVID, or you're just worried about getting COVID, you can get yourself a prescription and they mail it to you.⁸

AFLDS's website refers patients to SpeakWithAnMD.com, a telemedicine website created by right-wing commentator Jerome Corsi in collaboration with hydroxychloroquine

⁴ *New Mexico Health Officials Link Misuse of Ivermectin to Two Covid-19 Deaths*, New York Times (Sept. 26, 2021) (online at www.nytimes.com/live/2021/09/25/world/covid-delta-variant-vaccine/new-mexico-health-officials-link-misuse-of-ivermectin-to-two-covid-19-deaths).

⁵ *How Ivermectin Became the New Focus of the Anti-Vaccine Movement*, National Public Radio (Sept. 19, 2021) (online at www.npr.org/sections/health-shots/2021/09/19/1038369557/ivermectin-anti-vaccine-movement-culture-wars).

⁶ *See, e.g., Id.*; Office of the Surgeon General, *Confronting Health Misinformation: The U.S. Surgeon General's Advisory on Building a Healthy Information Environment* (July 15, 2021) (online at www.hhs.gov/sites/default/files/surgeon-general-misinformation-advisory.pdf).

⁷ Centers for Disease Control and Prevention, *COVID Data Tracker: Rates of COVID-19 Cases and Deaths by Vaccination Status* (online at <https://covid.cdc.gov/covid-data-tracker/#rates-by-vaccine-status>) (last accessed Oct. 28, 2021).

⁸ *How a Group with Right-Wing Ties Duped Tens of Thousands of Americans into Buying COVID-19 Drugs that Don't Work*, Business Insider (Sept. 30, 2021) (online at www.businessinsider.com/americas-frontline-doctors-sells-disproven-covid-drugs-2021-9).

proponent Dr. Vladimir Zelenko.⁹ AFLDS stated that SpeakWithAnMD.com provides phone consultations with “AFLDS-trained physicians” willing to prescribe hydroxychloroquine, ivermectin, and other unproven treatments.¹⁰ According to recent reports, AFLDS referred over 255,000 individuals to SpeakWithAnMD.com between July 16, 2021, and September 12, 2021—approximately 72,000 of whom paid \$90 for initial phone consultations and many of whom had follow-up consultations for an additional \$60. One investigation also found that some individuals were charged for consultations that never occurred. In total, individuals appear to have paid more than \$6.7 million for consultations during this two-month period, generating \$113,000 per day, on average, for AFLDS and SpeakWithAnMD.com.¹¹ While AFLDS’s and SpeakWithAnMD.com’s profits are unknown, this likely represents only a fraction of their total revenues over the course of the pandemic—particularly given that AFLDS appears to have started referring patients to SpeakWithAnMD.com by August 2020.¹²

Following these consultations, SpeakWithAnMD.com’s medical providers prescribed thousands of doses of potentially hazardous coronavirus treatments, including ivermectin and hydroxychloroquine. Patients reportedly paid millions of dollars to fill these prescriptions, nearly all out-of-pocket.¹³ The Food and Drug Administration (FDA), CDC, and National Institutes of Health (NIH) recommend against taking drugs like ivermectin and hydroxychloroquine to prevent or treat coronavirus infections because they are ineffective and can cause severe illness.¹⁴ SpeakWithAnMD.com makes patients acknowledge that “Hydroxychloroquine (HCQ) and Ivermectin have been deemed ‘Highly Not Recommended’ by

⁹ *Justice Dept. Scrutinizes White House-Connected Doctor Linked to Disputed Coronavirus Treatment*, Washington Post (Apr. 30, 2020) (online at www.washingtonpost.com/politics/vladimir-zev-zelenko-fox-news-trump-hydroxychloroquine-jerome-corsi/2020/04/30/82622456-8af2-11ea-ac8a-fe9b8088e101_story.html).

¹⁰ *Network of Right-Wing Health Care Providers Is Making Millions off Hydroxychloroquine and Ivermectin, Hacked Data Reveals*, The Intercept (Sept. 28, 2021) (online at <https://theintercept.com/2021/09/28/covid-telehealth-hydroxychloroquine-ivermectin-hacked/>).

¹¹ *Id.*; *How ‘America’s Frontline Doctors’ Sold Access to Bogus COVID-19 Treatments—and Left Patients in the Lurch*, Time (Aug. 26, 2021) (online at <https://time.com/6092368/americas-frontline-doctors-covid-19-misinformation/>); *Far-Right Health Care Companies Made Millions Prescribing Unproven Covid Remedies*, The Intercept (Oct. 13, 2021) (online at <https://theintercept.com./2021/10/13/intercepted-podcast-covid-ivermectin-profits/>).

¹² See Gary Ritter, *How to Legally Obtain Hydroxychloroquine (HCQ)* (online at <https://web.archive.org/web/20200927224547/https://garyritter.com/how-to-legally-obtain-hydroxychloroquine-hcq/>) (accessed Oct. 19, 2021).

¹³ *Network of Right-Wing Health Care Providers Is Making Millions off Hydroxychloroquine and Ivermectin, Hacked Data Reveals*, The Intercept (Sept. 28, 2021) (online at <https://theintercept.com/2021/09/28/covid-telehealth-hydroxychloroquine-ivermectin-hacked/>).

¹⁴ See, e.g., Centers for Disease Control and Prevention, *Rapid Increase in Ivermectin Prescriptions and Reports of Severe Illness Associated with Use of Products Containing Ivermectin to Prevent or Treat COVID-19* (Aug. 26, 2021) (online at <https://emergency.cdc.gov/han/2021/han00449.asp>); Food and Drug Administration, *FDA Cautions Against Use of Hydroxychloroquine or Chloroquine for COVID-19 Outside of the Hospital Setting or a Clinical Trial Due to Risk of Heart Rhythm Problems* (July 1, 2020) (online at www.fda.gov/drugs/drug-safety-and-availability/fda-cautions-against-use-hydroxychloroquine-or-chloroquine-covid-19-outside-hospital-setting-or); National Institutes of Health, *Chloroquine or Hydroxychloroquine and/or Azithromycin* (July 8, 2021) (online at www.covid19treatmentguidelines.nih.gov/therapies/antiviral-therapy/chloroquine-or-hydroxychloroquine-and-or-azithromycin/).

the [World Health Organization], FDA, CDC, and NIH,” before providing the disclaimer that “the clinician cannot be held liable nor can any medical license in any state be reviewed or held accountable” if “a patient choose[s] to not disclose their proper medical history.”¹⁵ Despite these warnings, AFLDS and SpeakWithAnMD.com have touted these drugs as supposed miracle cures for the coronavirus and have helped to enable their use by facilitating the writing of off-label prescriptions.¹⁶

AFLDS has used social media to spread misinformation about the coronavirus and promote its business interests over the course of the pandemic. Among other things, the organization has downplayed the risks of the coronavirus, misrepresented the effectiveness of mitigation measures such as masks, and promoted false claims about the coronavirus treatments and vaccines.¹⁷ This is particularly troubling since the organization and its members’ medical credentials lend credence to untested and dangerous claims.¹⁸ In addition to paid online consultations and prescriptions for questionable coronavirus treatments, AFLDS also sells merchandise, solicits donations to support its work, and has touted itself as a legal resource for people who seek to defy employer mandates to be vaccinated, tested, or wear a mask.¹⁹

I am deeply concerned that AFLDS is profiting from its deliberate spread of misinformation about the coronavirus. AFLDS’s promotion of falsehoods about coronavirus, questionable treatments, and vaccines is dangerous and may be putting American lives at risk and setting back our nation’s efforts to end the pandemic.

For these reasons, please provide the following information to the Select Subcommittee by November 12, 2021:

1. Documents sufficient to identify the ownership and organizational structure of AFLDS and any entity owned (in whole or in part), operated, or affiliated with AFLDS, including

¹⁵ SpeakWithAnMD.com (online at <https://speakwithanmd.telemedplatform.co/signup>) (last accessed on Oct. 5, 2021).

¹⁶ *Fringe Doctors’ Groups Promote Ivermectin for COVID Despite a Lack of Evidence*, Scientific American (Sept. 29, 2021) (online at www.scientificamerican.com/article/fringe-doctors-groups-promote-ivermectin-for-covid-despite-a-lack-of-evidence/); SpeakWithAnMD.com (@speakwithanmd), *Twitter* (Oct. 5, 2020) (online at <https://twitter.com/speakwithanmd/status/1313174023241527296>); SpeakWithAnMD.com (@speakwithanmd), *Twitter* (Sept. 9, 2020) (online at <https://twitter.com/speakwithanmd/status/1303813970181070848>).

¹⁷ *Social Media Giants Remove Viral Video with False Coronavirus Claims that Trump Retweeted*, CNN Business (July 28, 2020) (online at www.cnn.com/2020/07/28/tech/facebook-youtube-coronavirus/index.html); *How a Group with Right-Wing Ties Duped Tens of Thousands of Americans into Buying COVID-19 Drugs that Don’t Work*, Business Insider (Sept. 30, 2021) (online at www.businessinsider.com/americas-frontline-doctors-sells-disproven-covid-drugs-2021-9).

¹⁸ *Will ‘Dr. Disinformation’ Ever Face the Music?*, Kaiser Health News (Sept. 22, 2021) (online at <https://khn.org/news/article/disinformation-dozen-doctors-covid-misinformation-social-media/>).

¹⁹ *How ‘America’s Frontline Doctors’ Sold Access to Bogus COVID-19 Treatments—and Left Patients in the Lurch*, Time (Aug. 26, 2021) (online at <https://time.com/6092368/americas-frontline-doctors-covid-19-misinformation/>); *America’s Frontline Doctors* (online at www.americasfrontlinedoctors.org/shop/) (last accessed on Oct. 20, 2021).

but not limited to parents, subsidiaries, affiliates, and related entities. Please provide the name and a brief description of the services each company provides and a list of the officers and directors for each company.

2. All agreements, contracts, or other documents reflecting any formal or informal arrangement between AFLDS and SpeakWithAnMD.com.
3. The total number of AFLDS's referrals of patients to SpeakWithAnMD.com and/or its parent company, Encore Telemedicine, for consultations related to the coronavirus, including:
 - a. the total number of coronavirus patients referred by AFLDS;
 - b. when patients were referred to SpeakWithAnMD.com and received consultations;
 - c. the total amount patients paid for consultations to obtain coronavirus medications; and
 - d. the total amount AFLDS received from these coronavirus referrals.
4. The total number of prescriptions related to prevention or treatment of the coronavirus written by AFLDS or SpeakWithAnMD.com medical providers, including:
 - a. a breakdown of the types of medication prescribed (including but not limited to ivermectin, hydroxychloroquine, azithromycin, zinc, and vitamin C);
 - b. whether these were first-time prescriptions or refills;
 - c. the average price for each medication; and
 - d. the states in which these prescriptions were filled or sent.
5. The total number of AFLDS employees, officers, directors, or contractors that perform medical or other services related to the coronavirus, including:
 - a. the number of "AFLDS-trained and licensed physicians" or other medical providers within AFLDS's or SpeakWithAnMD.com's network that provide telemedicine consultations for coronavirus medications;
 - b. a detailed description of how AFLDS or Speak WithAnMD.com trained these providers;
 - c. the criteria AFLDS used to verify these providers were qualified to provide telehealth consultations; and
 - d. a detailed description of how AFLDS monitored providers' coronavirus prescribing patterns and interactions with patients.
6. All formal or informal criteria, protocols, policies, or other documentation provided to AFLDS-affiliated medical providers when considering coronavirus treatments, including but not limited to hydroxychloroquine and ivermectin, including:
 - a. policies or protocols on whether or how providers should consult or analyze patients' medical histories;
 - b. policies or protocols on whether or how providers should follow-up with patients; and
 - c. copies of any standard medical forms, waivers, or other documents provided to patients in connection with consultations with AFLDS providers.

7. A detailed description of AFLDS's total revenue and net income for each quarter, including the total revenues derived from offering or selling (whether received directly or indirectly, such as through the receipt of payments for referrals to third parties) coronavirus telemedicine services, coronavirus medications, merchandise, donations, or any other source.

These requests are consistent with the House of Representatives' authorization of the Select Subcommittee on the Coronavirus Crisis "to conduct a full and complete investigation" of "issues related to the coronavirus crisis," including "reports of waste, fraud, abuse, price gouging, profiteering, or other abusive practices related to the coronavirus crisis."²⁰

An attachment to this letter provides additional instructions for responding to this request. If you have any questions regarding this request, please contact Select Subcommittee staff at (202) 225-4400.

Sincerely,



James E. Clyburn
Chairman

Enclosure

cc: The Honorable Steve Scalise, Ranking Member

²⁰ H.Res. 8, sec. 4(f), 117th Cong. (2021); H.Res. 935, 116th Cong. (2020).

Responding to Oversight Committee Document Requests

1. In complying with this request, produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. Produce all documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.
2. Requested documents, and all documents reasonably related to the requested documents, should not be destroyed, altered, removed, transferred, or otherwise made inaccessible to the Committee.
3. In the event that any entity, organization, or individual denoted in this request is or has been known by any name other than that herein denoted, the request shall be read also to include that alternative identification.
4. The Committee's preference is to receive documents in electronic form (i.e., CD, memory stick, thumb drive, or secure file transfer) in lieu of paper productions.
5. Documents produced in electronic format should be organized, identified, and indexed electronically.
6. Electronic document productions should be prepared according to the following standards:
 - a. The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.
 - b. Document numbers in the load file should match document Bates numbers and TIF file names.
 - c. If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
 - d. All electronic documents produced to the Committee should include the following fields of metadata specific to each document, and no modifications should be made to the original metadata:

BEGDOC, ENDDOC, TEXT, BEGATTACH, ENDATTACH, PAGECOUNT, CUSTODIAN, RECORDTYPE, DATE, TIME, SENTDATE, SENTTIME, BEGINDATE, BEGINTIME, ENDDATE, ENDTIME, AUTHOR, FROM, CC, TO, BCC, SUBJECT, TITLE, FILENAME, FILEEXT, FILESIZE, DATECREATED, TIMECREATED, DATELASTMOD, TIMELASTMOD,

INTMSGID, INTMSGHEADER, NATIVELINK, INTFILPATH, EXCEPTION,
BEGATTACH.

7. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, zip file, box, or folder is produced, each should contain an index describing its contents.
8. Documents produced in response to this request shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when the request was served.
9. When you produce documents, you should identify the paragraph(s) or request(s) in the Committee's letter to which the documents respond.
10. The fact that any other person or entity also possesses non-identical or identical copies of the same documents shall not be a basis to withhold any information.
11. The pendency of or potential for litigation shall not be a basis to withhold any information.
12. In accordance with 5 U.S.C. § 552(d), the Freedom of Information Act (FOIA) and any statutory exemptions to FOIA shall not be a basis for withholding any information.
13. Pursuant to 5 U.S.C. § 552a(b)(9), the Privacy Act shall not be a basis for withholding information.
14. If compliance with the request cannot be made in full by the specified return date, compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided along with any partial production.
15. In the event that a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) every privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author, addressee, and any other recipient(s); (e) the relationship of the author and addressee to each other; and (f) the basis for the privilege(s) asserted.
16. If any document responsive to this request was, but no longer is, in your possession, custody, or control, identify the document (by date, author, subject, and recipients), and explain the circumstances under which the document ceased to be in your possession, custody, or control.
17. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, produce all documents that would be responsive as if the date or other descriptive detail were correct.

18. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date shall be produced immediately upon subsequent location or discovery.
19. All documents shall be Bates-stamped sequentially and produced sequentially.
20. Two sets of each production shall be delivered, one set to the Majority Staff and one set to the Minority Staff. When documents are produced to the Committee, production sets shall be delivered to the Majority Staff in Room 2157 of the Rayburn House Office Building and the Minority Staff in Room 2105 of the Rayburn House Office Building.
21. Upon completion of the production, submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control that reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

Definitions

1. The term “document” means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, data, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, communications, electronic mail (email), contracts, cables, notations of any type of conversation, telephone call, meeting or other inter-office or intra-office communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape, or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
2. The term “communication” means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, mail, releases, electronic

message including email (desktop or mobile device), text message, instant message, MMS or SMS message, message application, or otherwise.

3. The terms “and” and “or” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information that might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neutral genders.
4. The term “including” shall be construed broadly to mean “including, but not limited to.”
5. The term “Company” means the named legal entity as well as any units, firms, partnerships, associations, corporations, limited liability companies, trusts, subsidiaries, affiliates, divisions, departments, branches, joint ventures, proprietorships, syndicates, or other legal, business or government entities over which the named legal entity exercises control or in which the named entity has any ownership whatsoever.
6. The term “identify,” when used in a question about individuals, means to provide the following information: (a) the individual’s complete name and title; (b) the individual’s business or personal address and phone number; and (c) any and all known aliases.
7. The term “related to” or “referring or relating to,” with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is pertinent to that subject in any manner whatsoever.
8. The term “employee” means any past or present agent, borrowed employee, casual employee, consultant, contractor, de facto employee, detailee, fellow, independent contractor, intern, joint adventurer, loaned employee, officer, part-time employee, permanent employee, provisional employee, special government employee, subcontractor, or any other type of service provider.
9. The term “individual” means all natural persons and all persons or entities acting on their behalf.