

# Ending Retaliation by Specialty Boards That Certify Physicians

Andrew L. Schlafly, Esq.

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The AAPS Educational Foundation has filed a lawsuit against the Biden Administration and against medical specialty boards that are threatening to revoke physicians' earned certifications, based on their statements about matters of public concern.<sup>1</sup>

The lawsuit charges violation of physicians' First Amendment right to freedom of speech; tortious interference with the Foundation's ability to hold medical conferences and post presentations on the internet without a chilling effect caused by the boards' threatened retaliation against physicians for their free speech; and misuse of the Boards' monopoly power over certification.

Numerous presenters at conferences co-sponsored by the AAPS Educational Foundation have received letters threatening revocation of their earned board certifications for statements they made or repeated at these conferences.

Physicians, like everyone else in the U.S., have a constitutional right and also a duty to speak out on matters of public concern—whether they are members of Congress, candidates for political office, or simply practicing physicians.

Accusations of “disinformation” are invoked by political operatives to attempt to silence speech that is critical of the officials they favor. This has enormous political consequences. Every percentage point below 50 percent in the approval rating of a sitting president can translate into multiple congressional seats to be gained by the opposing party in a midterm election, as Joe Biden faces this November with his approval rating of less than 40 percent throughout the summer. Public statements that are critical of how the Biden Administration has managed the COVID-19 issue tend to drive down his approval rating. Criticism of Biden's top advisor on COVID-19 issues, Dr. Anthony Fauci, is disfavored by Biden's political promoters. A generation ago, such political insiders could control what is said on the network news, but today people obtain their information predominantly from the internet. This means that political forces seeking to censor speech critical of their agenda are desperately trying to censor the speakers themselves.

The First Amendment of the U.S. Constitution prohibits such censorship based on viewpoint when the censorship is by government, or anyone acting on its behalf. Despite this, the Biden Administration established a Disinformation Governance Board (DGB) to monitor and take action against what it considers to be disinformation. Though this board notoriously failed to launch, it is still ominous.

The term “disinformation” itself is interesting, as it is broader than the term “misinformation.” The concept of “disinformation” seems to include statements that are true, or potentially true, yet are disfavored by someone. The First Amendment fully protects such information, particularly as it relates to public policy, as comments concerning COVID-19 do.

Swift criticism from many parts of the political spectrum flowed against Biden's DGB, which was aptly compared to George Orwell's Ministry of Truth in his timeless novel, *1984*. Orwell wrote:

Parsons was Winston's fellow employee at the Ministry of Truth. He was a fattish but active man of paralyzing stupidity, a mass of imbecile enthusiasms—one of those completely unquestioning, devoted drudges on whom, more even than on the thought police, the stability of the Party depended.<sup>2</sup>

Indeed, in the interest of “the stability of the Party,” the ruling party increasingly resorts to censorship of criticism.

There was no First Amendment in the Orwellian dystopia described in *1984*. Today in the United States, uniquely in the world, all citizens including physicians have a First Amendment right to free speech. When the speech is about matters of public concern, such as comments about COVID-19, then free speech safeguards should be at their zenith. Infringement on them by any government official or anyone acting on behalf of government is a grave violation of constitutional rights.

Likewise, private entities should not be retaliating against physicians or anyone else for exercising their First Amendment rights. When a private entity holds a monopoly, as specialty boards affiliated with the American Board of Medical Specialties do, it can be an abuse of their monopoly power if they retaliate against physicians for exercising their free-speech rights. In addition, it can be a legal tort to willfully interfere with the exercise of constitutional rights.

The Foundation's lawsuit alleges that Defendants wrongly misuse their authority in a politically partisan manner to chill speech critical of positions taken by Dr. Anthony Fauci, lockdowns, mask mandates, COVID-19 vaccines and treatment, and even abortion. The lawsuit further alleges that Defendants have acted in an apparently coordinated manner, using similar timing and terminology, to censor those who exercise their First Amendment rights on issues of public concern.

## Senator Ron Johnson's Invitation to the American Board of Internal Medicine

After the American Board of Internal Medicine (ABIM) sent frightening letters to prominent physicians threatening them with revocation of their board certification based on their public comments about COVID-related policies, Senator Ron Johnson (R-Wis.) responded by inviting ABIM to attend one of his hearings on COVID, at which ABIM could explain its position. In his letter of Jun 15, 2022, Sen. Johnson states:

In America, different perspectives and diversity of opinions are protected under our Constitution and in

a time of crisis, encouraged. As a Senator charged with the responsibility of conducting oversight of federal government agencies, I asked these medical experts to publicly offer their opinions organized around the “four pillars of pandemic response” as originally published by Dr. McCullough. In order to have a balanced conversation, I invited the heads or other representatives of our federal health agencies and vaccine manufacturers to present their perspective and engage in a dialogue with Dr. McCullough, et al. I also invited those same health agency and manufacturer representatives to an event I held on November 2, 2021, featuring medical experts and individuals with vaccine injuries.

Unfortunately, the federal health agencies, public health experts and vaccine manufacturers did not accept my invitation to either event. Rather than engage in a public dialogue in which information and perspectives can be openly exchanged and debated, the individuals and organizations responsible for our pandemic response continue to attack and discredit those with a different perspective by using the vague pejorative of “spreading misinformation.”

It is well [p]ast time for the public to hear from many sides regarding COVID-19 in a public forum. The purpose of this letter is to invite you, members of your Credentials and Certification Committee, and any other medical expert of your choosing to come to Washington and engage in an open and honest interchange regarding all aspects of COVID-19, without the threat of reprisal by the ABIM or any other organization. I request your participation in a public forum on one of the following dates.... [footnotes omitted]<sup>3</sup>

Merely one day later, with an alacrity from which one might infer a lack of thoughtful, fair-minded deliberation, ABIM flatly and completely declined this invitation by its response letter to Sen. Johnson dated Jun 16, 2022.<sup>4</sup>

A Republican majority in either the House of Representatives or the Senate beginning in January could compel an appearance and testimony by ABIM and other specialty boards concerning their conduct. But a delay until January would be too long. Severe harm is already occurring due to the threats made against good physicians who speak out, and legal action to prevent against such retaliation is warranted immediately.

### **Positions Taken by Specialty Boards**

ABIM, the American Board of Obstetrics and Gynecology (ABOG), and the American Board of Family Medicine (ABFM) have certification monopolies in their respective specialties, which are based primarily on written multiple-choice medical examinations. Though ostensibly nonprofit and non-partisan, they are outspokenly allied with the Biden Administration on fundamental issues of lockdowns, mask and vaccine mandates, and some of them even on additional issues including abortion and surgical and pharmacological transgender interventions.

These specialty boards announced their campaign to act against certifications earned by physicians who make public statements with which the specialty boards disagree. ABIM and ABFM have already sent letters to physicians threatening them with revocation of their earned board certifications based on the exercise by those physicians of their First Amendment rights on matters of public policy. ABOG has publicly warned physicians against making statements against abortion and contraception, lest they have their earned board certifications revoked by ABOG if it disagrees with such statements.

This partisan retaliation by the specialty boards has been based in part on statements by physicians warning pregnant women against receiving the COVID vaccine, even though the World Health Organization issued a similar warning in 2021. Retaliation has occurred by these specialty boards against physicians who were praised by Robert F. Kennedy, Jr., in his bestselling book, *The Real Anthony Fauci*. In some cases, the retaliation is based expressly on physicians' criticism of Dr. Fauci, who as a government official may be freely criticized.

Though repeatedly wrong or contradicting himself, Dr. Fauci declared on the nationally televised *Face the Nation* that “I represent science” and that his critics “are really criticizing science.”<sup>5</sup> Republican Senators, including Dr. Rand Paul (R-Ky.) and Ted Cruz (R-Texas), sharply rebuked Dr. Fauci for his statements, and yet specialty boards seek to revoke earned board certifications from physicians in part for criticizing Dr. Fauci.

On or about May 26, 2022, ABIM sent unprecedented threatening letters to numerous prominent ABIM-certified physicians for making public statements that may disagree with the approach taken by Dr. Fauci and the Biden Administration to COVID-19. Likewise, and apparently in a coordinated manner, ABFM has sent similar threatening letters to numerous prominent ABFM-certified physicians. These letters did not explain any specific inaccuracy in anything said by these physicians, or provide any evidence of any falsehood, but instead generally objected to statements by these physicians concerning COVID-19 that are in the public debate.

ABOG, in a Jul 7 public announcement, reiterated its position on COVID-19 “misinformation” from Sept 21, 2021, and expanded it to physicians who make public statements against abortion or contraception, indicating that “[e]ligibility to gain or maintain ABOG certification may be lost.”<sup>6</sup> ABOG is stridently supportive of universal access to abortion and taxpayer funding of it, and ABOG sharply criticized the recent Supreme Court decision in *Dobbs v. Jackson’s Women Health Organization*. It threatened physicians opposed to abortion if they provide “false or misleading information” that is “used to advocate for legislation, regulations, criminal code, and health policy.”<sup>6</sup> This infringes on the constitutional rights of physicians to participate in the processes of legislation and public policy decision-making, as what ABOG considers to be “false or misleading” includes many statements against abortion. ABOG denies harm caused by abortion, even harm reported in published peer-reviewed medical studies. ABOG is chilling physicians' free speech on this issue, and unjustifiably impeding robust debate of medical issues at medical conferences.

The specialty boards are businesses. Their product is to create, administer, and score examinations of physicians in certain specialties. It is doubtful that these entities have actual experience in the management of COVID-19, vaccination of pregnant women, mask mandates, or lockdowns. Yet, ABIM and ABOG engage in a pattern of advocating for positions taken by the Biden Administration on multiple issues, including abortion. On the very same day that the Biden Administration made statements criticizing the Supreme Court decision that overturned *Roe v. Wade*, ABIM itself made intemperate and unjustified public statements against the Supreme Court decision, accusing it of inflicting harm on health care in the United States “for many years to come.” ABIM is not even the specialty board for obstetrics, and apparently has no substantial legal expertise on constitutional issues.

Although only official state medical boards have the proper authority to regulate the practice of medicine, certifications by these specialty boards constitute a *de facto* essential credential for practicing in most hospitals and participating in most insurance networks. By threatening to revoke board certification of physicians, specialty boards improperly chill speech by physicians without the political accountability of official state medical boards.

### Disinformation Governance Board

Department of Homeland Security (DHS) Secretary Alejandro Mayorkas, in his capacity as a cabinet official in the Biden Administration, has created the Orwellian Disinformation Governance Board (“DGB”) in order to censor disfavored information based on its content.

The creation of the DGB and the specialty boards’ threatening letters to physicians came within months of President Joe Biden issuing the following directive: “I make a special appeal to social media companies and media outlets: Please deal with the misinformation and disinformation that’s on your shows. **It has to stop**” [emphasis added].<sup>7</sup>

Likewise, about six months earlier the Biden Administration declared at a press briefing hosted by Press Secretary Jen Psaki and Surgeon General Dr. Vivek H. Murthy that “we are in regular touch with these social media platforms, and those engagements typically happen through members of our senior staff.”<sup>8</sup>

Dr. Fauci, as the long-time director of the National Institute of Allergy and Infectious Diseases and a top adviser to President Biden, appeared to call implicitly for the censorship of speech based on content that one political party disfavors. In a May 7 Commencement address at the University of Michigan, Dr. Fauci told graduates:

If you remember nothing else from what I say today, I truly appeal to you, please remember this: It is our collective responsibility not to sink to a tacit acceptance of the normalization of untruths, because if we do, we bring danger to ourselves, our families and our communities....

This is how a society devolves into a way of life where veracity becomes subservient to propaganda rather than upheld as a guiding principle for creating

and sustaining a just social order.<sup>9</sup>

There is no statutory authority for the DGB. Congress has considered but never enacted legislation to authorize such a governmental board. Examples of proposed legislation on this issue that were never enacted include the COVID-19 Disinformation Research and Reporting Act of 2021, S. 913, 117th Cong. (2021), and A Bill To Amend the Communications Act of 1934, S. 2448, 117th Cong. (2021).

DHS Secretary Mayorkas has thereby acted without congressional authorization, which renders the DGB an *ultra vires*, unconstitutional abuse of power by the Executive Branch. He also violates the separation of powers and overreaches beyond the constitutional limits on his proper authority.

Criticism of the DGB has been intense from both sides of the political spectrum, although misreported as being primarily from the political right. Both Elon Musk and Jeff Bezos appeared to criticize the DGB, as have liberal politicians. For example, Bezos, who owns the liberal-leaning *Washington Post*, sarcastically tweeted against the DGB as follows:

The newly created Disinformation Board should review this tweet [by Biden], or maybe they need to form a new Non Sequitur Board instead. Raising corp taxes is fine to discuss. Taming inflation is critical to discuss. Mushing them together is just misdirection.<sup>10</sup>

Twenty State Attorneys General, led by Virginia’s Attorney General and joined by Texas’s, signed and publicly released a May 5, 2022, letter addressed to Mayorkas, which protested the unconstitutionality of the DGB. It stated:

***The existence of the Disinformation Governance Board will inevitably have a chilling effect on free speech*** [emphasis added]. Americans will hesitate before they voice their constitutionally protected opinions, knowing that the government’s censors may be watching, and some will decide it is safer to keep their opinions to themselves. The resulting damage to our political system and our culture will be incalculable: as a democracy, our political debates and decisions are supposed to take place in the public square, where every citizen can participate, rather than in government office buildings where hand-picked and unaccountable partisan committees are insulated from public supervision and criticism....

[The DGB] is therefore **already** chilling free speech and impeding the political process in Virginia and every other State [emphasis in original].<sup>11</sup>

Their strong letter repeated what “Justice Brandeis explained long ago, ‘the remedy to be applied is more speech, not enforced silence.’” *Whitney v. California*, 274 U.S. 357, 377 (1927) (Brandeis, J., concurring).<sup>11</sup>

DHS announced in a May 2 press release that it directed that the “Homeland Security Advisory Council (HSAC) make recommendations for how the Department can most effectively and appropriately address disinformation that poses a threat to the homeland, while protecting free speech and other fundamental rights.”<sup>12</sup> HSAC is a committee subject to the requirements of the Federal Advisory Committee Act (FACA).

Amid a public backlash, it was widely reported on May

18 that DHS “paused” its DGB, that its first Executive Director resigned, and that recommendations were expected from HSAC within 75 days concerning how the DGB should proceed further. Yet the HSAC is acting in ongoing violations of FACA with respect to the DGB. Moreover, the DGB agenda of retaliating against speech disfavored by the Biden Administration continues to be imposed by specialty boards.

Polling shows that many people agree with physicians who criticize government approaches to COVID-19. The non-partisan widely cited “fivethirtyeight.com” website shows that 43.2 percent of Americans disapproved of Biden’s handling of COVID-19 as of Jun 22, 2022.

## The Chilling Effect

Courts recognize a pernicious “chilling effect” caused by retaliation or even threats of retaliation against someone based on exercising his First Amendment right to free speech. Physicians who speak and attend conferences held by the AAPS Educational Foundation, and the Foundation itself, have First Amendment injuries to their rights of freedom of speech, for which the “loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury” (*Elrod v. Burns*, 427 U.S. 347, 373 (1976)). The AAPS Educational Foundation has thereby suffered—and continues to suffer—irreparable harm due to retaliation against physicians who speak out.

DHS Secretary Mayorkas’s creation of a DGB has a chilling effect on internet speech and medical conference presentations, as DGB’s mere existence encourages or induces the specialty boards and others to retaliate against speakers based on the content of their speech on matters of public policy.

There is little or no transparency in the communications and actions by the DGB, and specialty boards and others will censor more speech than may even be expressly sought by the DGB.

The chilling effect caused by DHS Secretary Mayorkas’s actions is unconstitutional under the First Amendment to the U.S. Constitution. Additionally, specialty boards have lobbied for and sometimes obtained government endorsement of their certifications at the federal level. Specialty boards have also sought and sometimes obtained, at the state level, government restrictions on physicians against referring to themselves as “board certified” unless certified by the specialty boards. Many hospitals and insurance networks require certification by specialty boards, and thus their revocation of board certification can have a devastating effect on the practice of medicine by a physician, in some cases being tantamount to revoking his license to practice medicine.

## The Homeland Security Advisory Council and the Federal Advisory Committee Act

HSAC is governed by its charter, which requires that members be drawn from “police, fire, emergency medical services, and public works; public health; state, local, and tribal officials; national policy makers; experts in academia and the research community; and leaders from the private

sector including, but not limited to, owners and operators of critical industries, resources, and infrastructure.”<sup>13</sup>

Accordingly, none of the members of HSAC is required by its charter to have any experience with First Amendment freedom of speech issues, social media, censorship on the internet, or addressing public “disinformation” however defined. Moreover, nothing in the charter of HSAC authorizes it to address First Amendment issues concerning freedom of speech, or censorship on the internet. The charter limits it as an advisory body to providing only “organizationally independent, strategic, timely, specific and actionable advice to the Secretary and senior leadership on matters related to homeland security.”<sup>13</sup>

The purpose of HSAC is plainly stated in its charter and primarily relates to “terrorist attacks, major disasters, or other emergencies,” a phrase that is repeated multiple times.

As the DGB provides advice to a federal agency, it is subject to FACA. An official, publicly released letter dated Jun 7, 2022, by Sen. Charles Grassley (R-Iowa) and Sen. Josh Hawley (R-Mo.) to DHS Secretary Mayorkas explains facts indicative of a FACA violation:

Documents show that, contrary to [Mayorkas’s] May 4, 2022, testimony before the Senate Committee on Homeland Security and Governmental Affairs, the DGB was established to serve as much more than a simple “working group” to “develop guidelines, standards, [and] guardrails” for protecting civil rights and civil liberties. In fact, DHS documents show that the DGB was designed to be the Department’s central hub, clearinghouse and gatekeeper for [Biden] Administration policy and response to whatever it happened to decide was “disinformation”....

Documents also suggest that the Department has been working on plans to “operationalize” its relationships with private social media companies to implement its public policy goals. For example, we obtained draft briefing notes prepared for a scheduled April 28, 2022, meeting ... [and t]he briefing notes frame the planned meeting ... [with] the Twitter executives as “an opportunity to discuss operationalizing public-private partnerships between DHS and Twitter, as well as [to] inform Twitter executives about DHS work on MDM, including the creation of the Disinformation Governance Board and its analytic exchange...”<sup>14</sup>

Apparent violations of FACA include: failure to ensure that HSAC is “fairly balanced in terms of the points of view represented and the functions to be performed by the advisory committee” (5 U.S.C. app. 2 § 5(b)(2)); failure to appoint a Designated Federal Officer; and failure to make any documents of HSAC available concerning its communications and activities with respect to the DGB. FACA requires that “the records, reports, transcripts, minutes, appendixes, working papers, drafts, studies, agenda, or other documents which were made available to or prepared for or by each advisory committee shall be available for public inspection and copying at a single location in the offices of the advisory committee or the agency to which the advisory committee reports until the advisory committee ceases to exist” (5 U.S.C. app. 2 § 10(b)).

## Violation of Section 2 of the Sherman Antitrust Act

Each of the specialty boards has a certification monopoly in its respective medical practice specialties, each controlling more than 80 percent of the market for certification of physicians in their corresponding specialties. This lawsuit alleges that specialty boards have abused their examination-based monopoly in order to interfere with physicians' freedom of speech, and that specialty boards have thereby wrongfully interfered with the market for medical conferences and the posting of presentations from such conferences on the internet.

## Prayer for Relief

The Declaratory Judgment Act provides relief when statutory duties are violated (*Citizens for Responsibility & Ethics in Wash. v. Cheney*, 593 F. Supp. 2d 194, 222 (D.D.C. 2009)). Accordingly, this lawsuit seeks a declaratory judgment against any concerted activity by the specialty boards with the Biden Administration in infringing on the First Amendment right of freedom of speech by physicians by threatening to revoke their earned certifications based on the physicians' statements about matters of public concern. Further, it seeks a declaration that specialty boards are tortiously interfering with the ability of the AAPS Educational Foundation to hold medical conferences and post presentations on the internet without a chilling effect caused by the specialty boards' threatened retaliation against physicians for making statements on matters of public concern. Additionally, it seeks a declaration that specialty boards are misusing their monopoly power over certification, which is based primarily on written multiple-choice examinations, to retaliate against physicians for their public statements on matters of public policy.

Regarding HSAC, the lawsuit seeks a declaration that HSAC has violated FACA and must comply with all its requirements.

The prayer for relief also seeks an injunction requiring the DGB to be disbanded and permanently discontinued.

**Andrew L. Schlafly, Esq.**, is General Counsel of the Association of American Physicians and Surgeons. Contact: [aschlafly@aol.com](mailto:aschlafly@aol.com).

## REFERENCES

1. Complaint. *Association of American Physicians and Surgeons Educational Foundation v. American Board of Internal Medicine, American Board of Obstetrics & Gynecology, American Board of Family Medicine, and Alejandro Mayorkas*, in his official capacity as the Secretary of the U.S. Department of Homeland Security. Case No. 3:22-cv-240. United States District Court for the Southern District Of Texas. Available at: <https://aapsonline.org/judicial/aapsedfnd-v-abim-abog-abfm-dhs-7-12-2022.pdf>. Accessed Aug 5, 2022.
2. Orwell G. 1984. Available at: <https://nichequotes.com/orwell-ministry-of-truth-quotes>. Accessed Aug 6, 2022.
3. Johnson R. Sen. Johnson calls on American Board of Internal Medicine to participate in COVID-19 public forum. Press release; Jun 15, 2022. Available at: <https://www.ronjohnson.senate.gov/2022/6/sen-johnson-calls-on-american-board-of-internal-medicine-to-participate-in-covid-19-public-forum>. Accessed Aug 6, 2022.
4. Baron R. Letter to Sen. Ron Johnson; Jun 16, 2022. Available at: <https://www.skirsch.com/covid/ABIMreply.pdf>. Accessed Aug 6, 2022.
5. CBS News. Transcript: Dr. Anthony Fauci on 'Face the Nation'; Nov 28, 2021. Available at: <https://www.cbsnews.com/news/transcript-dr-anthony-fauci-on-face-the-nation-november-28-2021/>. Accessed Aug 6, 2022.
6. ABOG. Statement Regarding Misinformation and Disinformation and Medical Professionalism; Jul 7, 2022. Available at: <https://www.abog.org/about-abog/news-announcements/2022/07/07/statement-regarding-misinformation-and-disinformation-and-medical-professionalism>. Accessed Aug 6, 2022.
7. Biden J. Remarks at Virtual Meeting on Military Deployments Supporting Hospitals for the COVID-19 Response, The White House; Jan 13, 2022. Available at: <https://tinyurl.com/45ezsejt>. Accessed Aug 6, 2022.
8. Psaki J, Murthy VH. Press briefing. The White House; Jul 15, 2021. Available at: <https://tinyurl.com/bdsc4jhh>. Accessed May 12, 2022.
9. Bleiler J, Iseler J. Fauci to comeback graduates: Fight 'the normalization of untruths.' *University Record*, May 7, 2022. Available at: <https://record.umich.edu/articles/fauci-to-comeback-grads-fight-normalization-of-untruths/>. Accessed Aug 6, 2022.
10. Bezos J. Twitter posting; May 13, 2022. Available at: <https://twitter.com/JeffBezos/status/1525309091970699265>. Accessed Aug 6, 2022.
11. Miyares J. Letter to Department of Homeland Security; May 5, 2022. Available at: [https://www.oag.state.va.us/files/MIYARES2022/DGBLetter\\_Final.pdf](https://www.oag.state.va.us/files/MIYARES2022/DGBLetter_Final.pdf). Accessed Jun 11, 2022.
12. Homeland Security. Fact Sheet: DHS internal working group protects free speech and other fundamental rights when addressing disinformation that threatens the security of the United States. Press release; May 2, 2022. Available at: <https://www.dhs.gov/news/2022/05/02/fact-sheet-dhs-internal-working-group-protects-free-speech-other-fundamental-rights>. Accessed Aug 6, 2022.
13. United States Department of Homeland Security. Homeland Security Advisory Council Charter. Available at: [https://www.dhs.gov/sites/default/files/publications/hsac\\_charter\\_renewal\\_508.pdf](https://www.dhs.gov/sites/default/files/publications/hsac_charter_renewal_508.pdf). Accessed Aug 6, 2022.
14. Grassley CE, Hawley J. Letter to Alejandro N. Mayorkas; Jun 7, 2022. Available at: [https://www.grassley.senate.gov/imo/media/doc/grassley\\_hawley\\_to\\_deptofhomelandsecuritydisinformationgovernanceboard.pdf](https://www.grassley.senate.gov/imo/media/doc/grassley_hawley_to_deptofhomelandsecuritydisinformationgovernanceboard.pdf). Accessed Aug 6, 2022.

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