

December 27, 2024

VIA EMAIL AND FEDEX

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Roberta Hines, M.D.
Dartmouth-Hitchcock Medical Center
Board of Trustees Chair
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Re: *Dartmouth Hitchcock Medical Center Organ Transplant Vaccination Policy:*
[REDACTED]

Dear Dr. Conroy, Dr. Huntington, Mr. Kacavas, and Dr. Hines:

We write on behalf of our clients, [REDACTED] and Informed Consent Action Network (“ICAN”), concerning a policy at Dartmouth Hitchcock Medical Center (“DHMC”) that requires vaccinations for organ recipients. As your staff is aware, [REDACTED] currently has 12% percent kidney function and is in desperate need of a life-saving kidney transplant. Yet your hospital refuses to approve [REDACTED] for this transplant unless she receives a COVID-19 vaccine, a shingles vaccine, and two rounds of the hepatitis B vaccine. DHMC’s vaccination requirement policy is in direct violation of New Hampshire law.

Under Section 151:21 of the New Hampshire Patients’ Bill of Rights, a “**patient shall not be denied admission, care, or services based solely on the patient’s vaccination status.**”¹ Your website acknowledges this and states that DHMC “strive[s] to preserve [patients’] rights as an individual” and links to the NH Patient’s Bill of Rights.² Thus, DHMC’s denial of organ transplant services to [REDACTED], based on her refusal to receive the COVID-19 vaccination,³ is clearly in violation of state law. As such, we strongly encourage you to reconsider your position regarding [REDACTED] kidney transplant. If DHMC refuses, [REDACTED] is prepared to pursue any and all legal recourse available to her.

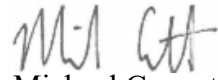
¹ See Section 151:21 Patients’ Bill of Rights., <https://gencourt.state.nh.us/rsa/html/XI/151/151-21.htm> (emphasis added).

² See <https://www.dartmouth-hitchcock.org/about/patient-rights-privacy>.

³ As [REDACTED] has explained to you, she is willing to receive the shingles and hepatitis vaccines.

We look forward to seeing the above issue promptly addressed. Govern yourselves accordingly.

Very truly yours,

Handwritten signature in black ink, appearing to read 'M-C' followed by a stylized flourish.

Michael Connett, Esq.*

Elizabeth A. Brehm, Esq.

Dana Smith, Esq.

*Counsel will seek admission *pro hac vice* should the need arise.