

200 Park Avenue, 17th Floor, New York, NY 10166
sirillp.com | P: (212) 532-1091 | F: (646) 417-5967

VIA FED EX

May 26, 2022

Rochelle Walensky
Director, CDC
1600 Clifton Road
Atlanta, GA 30329-4027

Dr. Carissa F. Etienne
PAHO/WHO Director
Regional Office for the Americas
525 23rd Street NW
Washington, DC 20037

Re: *W.H.O. changes to the definition of the term "herd immunity"*

Dear Dr. Walensky and Dr. Etienne:

We write on behalf of our client, Informed Consent Action Network ("ICAN"), in response to the changes the World Health Organization has made to its websites regarding the definition of herd immunity in 2020.

(I found this article that does some great footwork on this issue here <https://www.11alive.com/article/news/verify/verify-changes-who-definition-herd-immunity-not-secret/507-f90c0199-c88e-4c66-8313-b4ae6e2a72ad>. It shows that the W.H.O did change the definition to vaccine herd immunity only and then it corrected it. Below are the three posts at the W.H.O. website proving this.

<https://web.archive.org/web/20201023093420/https://www.who.int/news-room/q-a-detail/coronavirus-disease-covid-19-serology> - June 9, 2020 version of the COVID-19 serology Q&A page. - Original definition

<https://web.archive.org/web/20201124094747/https://www.who.int/news-room/q-a-detail/coronavirus-disease-covid-19-serology> Nov. 13, 2020 - Vaccine only definition

<https://www.who.int/news-room/questions-and-answers/item/coronavirus-disease-covid-19-serology> - Dec. 31, 2020 – W.H.O. correct its statement. This is the latest update made to this particular page.)

Regards,



Aaron Siri, Esq.

Elizabeth A. Brehm, Esq.