

Christine Finley  
Immunization Program Chief  
Vermont Department of Health  
Burlington, VT

September 2, 2015

Dear Christine Finley,

As a public health official serving the taxpayers of Vermont, surely it is not your intention to promote false and misleading claims or erroneous information when it comes to public health. However, the following claim is made in your press release dated August 14<sup>th</sup> regarding the HPV vaccine, “Three doses of the HPV vaccine given over six months are needed for a person to be *fully protected*.”

On the Gardasil Website, manufacturer Merck states, “Gardasil **does not prevent all types of cervical cancer**.”<sup>1</sup> Merck’s own product information states, “Gardasil **may not fully protect** everyone who gets the vaccine. Gardasil **will not protect against** HPV types that you already have.”<sup>2</sup>

Furthermore, Gardasil only addresses HPV Types 6, 11, 16, and 18 —just four of the forty types of HPV that can infect the genital area.<sup>3</sup> In the new Gardasil 9-HPV vaccine, nine types of HPV are included and again, Merck’s product insert states that it is given, “...to *help protect* against diseases caused by *some* types of Human Papillomavirus (HPV).” And, “Gardasil 9 *may not fully protect* each person who gets it.”<sup>4</sup>

The product information for Cervarix, manufactured by GlaxoSmithKline, states, “As with all vaccines, Cervarix *may not fully protect* all people who are vaccinated.”<sup>5</sup> And the FDA states, “None of the vaccines will protect against the types of HPV that are not covered by the vaccine.”<sup>6</sup>

It would seem your sweeping statements of full protection are in direct contradiction to the FDA and the manufacturer’s own product information.

In addition, since HPV vaccines were introduced seven years ago, the premise has been that the vaccines would prevent cervical cancer. Yet the vaccines have never definitively been demonstrated to prevent any cancer, cervical or otherwise, much less “fully protect” anyone.<sup>7 8 9</sup>

It has also been assumed for seven years that HPV vaccines are safe. Yet, to date there have been more than 32,000 HPV adverse event (VAERS) reports, including sixty-five from Vermont since 2006. Compared to all other vaccines in the U.S. schedule, Gardasil alone is associated with 61% of all serious adverse events including 63.8% of all deaths and 81.2% of all permanent disabilities in females under 30 years old.<sup>10</sup>

India<sup>11</sup> and Japan<sup>12 13</sup> have removed HPV vaccines from their recommended list due to safety and efficacy concerns. Unethical practices and serious post-HPV-vaccination injuries and deaths prompted the Supreme Court of India to initiate an investigation of the HPV vaccine program of PATH and the Bill and Melinda Gates Foundation.<sup>14</sup> In France, doctors and other health providers have called for the halt of the HPV vaccine due to questions of safety and efficacy.<sup>15</sup>

Prompted by medical reports of post-HPV-vaccination arrhythmia and motor neuron disabilities in children in Denmark, the European Medicines Agency is conducting an investigation of HPV injection adverse events.<sup>16</sup> Law suits for HPV injuries and deaths have been filed in Spain, France and Columbia.

Some studies have linked serious HPV vaccine adverse events to the aluminum adjuvant that is a known neurotoxin.<sup>17 18 19 20</sup> Yet, Cervarix and the new Gardasil 9, contain *double* the amount of aluminum adjuvant (500mcg) than Gardasil (225mcg).<sup>21 22</sup>

We already have *proven, safe and effective* ways to prevent cervical cancer with pap screening and HPV testing that carry no serious health risks and are cheaper than HPV vaccines, which range in price from \$312 to \$423 per child.<sup>23</sup>

The FDA has strict rules regarding making false claims about health products. When you state, “The HPV vaccine is cancer prevention,” that is a grossly false, unsubstantiated and misleading claim. The public deserves better from its public health officials.

Sincerely,

Jennifer Stella, Co-Director VCVC  
Dorian Yates, Co-Director VCVC  
Sandy Reider, MD

CC: Governor Peter Shumlin  
Commissioner Harry Chen  
Speaker Shap Smith  
Senator Claire Ayer, Chairwoman, Senate Health & Welfare Committee  
Representative William Lippert, Chairman, House Health Committee  
Tracy Dolan, Deputy Commissioner of Public Health  
U.S. Senator Patrick Leahy  
U.S. Senator Bernie Sanders  
U.S. Representative Peter Welch  
Vermont State Legislators

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<sup>1</sup> <http://www.gardasil.com>

<sup>2</sup> [http://www.merck.com/product/usa/pi\\_circulars/g/gardasil/gardasil\\_ppi.pdf](http://www.merck.com/product/usa/pi_circulars/g/gardasil/gardasil_ppi.pdf)

<sup>3</sup> <http://www.cancer.gov/about-cancer/causes-prevention/risk/infectious-agents/hpv-fact-sheet>

<sup>4</sup> [http://www.merck.com/product/usa/pi\\_circulars/g/gardasil\\_9/gardasil\\_9\\_ppi.pdf](http://www.merck.com/product/usa/pi_circulars/g/gardasil_9/gardasil_9_ppi.pdf)

<sup>5</sup> <http://www.medicines.org.uk/emc/PIL/20207.latest.pdf>

<sup>6</sup> <http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm383757.htm>

<sup>7</sup> Tomljenovic L, Shaw CA, Spinosa JP: Human Papillomavirus (HPV) Vaccines as an option for preventing cervical malignancies: (How) effective and safe? *Curr Pharm Des.* 2013;19(8):1466-87. <http://www.ncbi.nlm.nih.gov/pubmed/23016780>

<sup>8</sup> Tomljenovic L, Shaw CA: Who profits from uncritical acceptance of biased estimates of vaccine efficacy and safety? *Am J Public Health* 2012, 102(9):e13–e14.

<sup>9</sup> Tomljenovic L, Shaw CA: Human papillomavirus (HPV) vaccine policy and evidence-based medicine: are they at odds? *Ann Med* 2011, doi:10.3109/07853890.2011.645353. <http://www.ncbi.nlm.nih.gov/pubmed/22188159>

<sup>10</sup> Tomljenovic L, Wilyman J, Vanamee E, Bark T, Shaw CA. HPV vaccines and cancer prevention, science versus activism. *Infectious Agents and Cancer* 2013,8:6. <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3565961/>

<sup>11</sup> [http://articles.economicstimes.indiatimes.com/2013-01-08/news/36216483\\_1\\_vaccines-gardasil-cervical-cancer](http://articles.economicstimes.indiatimes.com/2013-01-08/news/36216483_1_vaccines-gardasil-cervical-cancer)

<sup>12</sup> [http://ajw.asahi.com/article/behind\\_news/social\\_affairs/AJ201306150057](http://ajw.asahi.com/article/behind_news/social_affairs/AJ201306150057)

<sup>13</sup> Mulcahy, Nick. Japan Withdraws HPV vaccine recommendation for girls. June 25, 2013. <http://www.medscape.com/viewarticle/806645>

<sup>14</sup> Human Rights Law Network, India: <http://www.hrln.org/hrln/reproductive-rights/pils-a-cases/1330-supreme-court-issues-notice-to-government-us-based-ngo-path-and-dcgi-in-two-hrln-vaccine-matters-1-sept-2013.html>

<sup>15</sup> French Medical Doctors call to “Delist & Suspend HPV Vaccines: <http://www.medocean.re/new/actions/vaccin-gardasil/item/90-petition-pour-la-mise-en-place-d-une-mission-parlementaire-concernant-le-gardasil>

<sup>16</sup> Chustecka Z. Safety Profile of HPV Vaccines Under Review in Europe. *Medscape.* July 13, 2015. <http://www.medscape.com/viewarticle/847841>

<sup>17</sup> Lee, SH. Detection of human papillomavirus (HPV) L1 gene DNA possibly bound to particulate aluminum adjuvant in the HPV vaccine Gardasil. *Journal of Inorganic Biochemistry.* 117 (2012) 85-92. [www.elsevier.com/locate/jinorgbio](http://www.elsevier.com/locate/jinorgbio).

<sup>18</sup> Shoenfeld Y, Agmon-Levin N. ‘ASIA’ – Autoimmune/inflammatory syndrome induced by adjuvants. *Journal of Autoimmunity*, 2010; XXX: 1-5. <http://www.ncbi.nlm.nih.gov/pubmed/20708902?dopt=Abstract>

<sup>19</sup> Tomljenovic L, Shaw CA. Mechanisms of Aluminum adjuvant toxicity and autoimmunity in pediatric populations. *Lupus* 2012; 21:223-230. <http://www.ncbi.nlm.nih.gov/pubmed/22235057>

<sup>20</sup> Shaw CA, Petrik MS. Aluminum hydroxide injections lead to motor deficits and motor neuron degeneration. *J Inorg Biochem* 2009; 103: 1555-1562. [http://homeoint.ru/pdfs/Aluminum\\_hydroxide\\_leads\\_to\\_motor\\_deficit.pdf](http://homeoint.ru/pdfs/Aluminum_hydroxide_leads_to_motor_deficit.pdf)

<sup>21</sup> [http://www.merck.com/product/usa/pi\\_circulars/g/gardasil\\_9/gardasil\\_9\\_pi.pdf](http://www.merck.com/product/usa/pi_circulars/g/gardasil_9/gardasil_9_pi.pdf)

<sup>22</sup> <http://www.vaccinesafety.edu/components-HPV.htm>

<sup>23</sup> [http://www.vtvaccine.org/vtvaccine.nsf/WebEvents/ACC1040FBA30D99585257D26006F6413/\\$File/VVPP%20-%20Vaccine%20Cost%20per%20Dose%20Comparison.pdf](http://www.vtvaccine.org/vtvaccine.nsf/WebEvents/ACC1040FBA30D99585257D26006F6413/$File/VVPP%20-%20Vaccine%20Cost%20per%20Dose%20Comparison.pdf)