

BETWEEN:

DAVID EGAN AND SHARON BROWNE AND EMMANUEL LAVERY

Plaintiffs

-And-

MINISTER FOR HEALTH, AN TAOISEACH, AND HSE

Defendants

Book of Authorities for Fraud in this Case

The involvement of Fraud in the covid19 vaccinations of children and adults in Ireland and its relevance to the Court Injunction we request from the High Court

The obtaining of Informed Consent by Non Disclosure, False Pretences, Fraudulent Misrepresentation, Deception and Fraud. Counts of Fraud, Court Precedents, National and International Laws which apply in this case of fraud. This led to both financial losses and human health losses including many people becoming seriously ill, disabled or suffering premature death caused by these experimental covid19 vaccines.

1. I cite the famous court precedent of **Lord Denning in Lazarus Estates Ltd v Beasley [1956]** where the learned judge famously said

“Fraud unravels everything. The court is careful not to find fraud unless it is distinctly pleaded and proved; but once it is proved, it vitiates judgments, contracts and all transactions whatsoever”.

And the precedent set by the judge Lord Denning certainly applies in our High Court case. We provide many examples of fraud in this document. This specifically relates to the obtaining of informed consent by non disclosure, false pretences, deception and fraud, which is fraud.

Brook Jackson the Pfizer whistleblower who exposed frauds in the Pfizer covid19 vaccine trial and in it's filings to the FDA in the USA and the EMA in Europe is now before a US Federal court. This was detailed in Point 24 of our affidavit filed in the High Court in December 2022. Pfizer admitted in this US court case that they **"delivered the fraud ordered by the government"**. This admission of fraud by Pfizer in relation to the covid19 vaccine in this US court case in 2022 is of great relevance to our High Court case. It confirms what we are pleading in this High Court case. The net effect of this is fraud and obtaining the informed consent of people by fraud and deception in the USA, Europe, Ireland and worldwide. Her Whistleblower Report was published in the British Medical Journal in November 2021. This is one of the top medical journals in the world. I enclose the link to this scientific article below

<https://www.bmj.com/content/375/bmj.n2635>

This is **'Exhibit 120 - BMJ' for the court.**

The legal documents for this court case can be viewed at

<https://www.iambrookjackson.com/casedocuments>

and this is **'Exhibit 120 – Brook Jackson' for our High Court case.**

Dr. Joseph Mercola, a medical doctor in the USA has supplied additional details and evidence about this fraud at <https://takecontrol.substack.com/p/did-pfizer-fake-covid-vaccine-research>

This is **'Exhibit 120 – Dr. Joseph Mercola' for our High Court case.**

Fraud is actually admitted to here by Pfizer itself in relation to the Pfizer covid19 vaccine in this ongoing US Federal court case which is being appealed to the higher courts in the USA at present and will end up in the US Supreme Court for final adjudication. The judge in the Texas Federal Court has recently admitted that false records and documents may have been used, but this does not adversely affect the contract which was specifically to deliver vaccines from Pfizer to the US government subject to FDA approval for these vaccines. The important point according to the judge is the FDA approval as the contract depends on that. He said if the FDA made a mistake or an error in this approval then that is their fault, and that could be the subject of litigation and court cases. The issue of false documents and records being used to get FDA approval will be resolved through appeal to the higher courts in the USA, and ultimately will be decided in the US Supreme Court.

I cite below the ongoing court case below:

United States of America ex rel. Brooks Jackson VS Ventavia Research Group, LLC et al.

Case Number: 1:21-cv-00008

This court case is ongoing and being appealed to the higher courts in the USA in 2023 and may reach final judgment and outcome at the end of 2023 or in 2024. The ramifications of this court case are immense as

the Pfizer vaccine was given to millions of people in many countries, including in Ireland and the defects and frauds being exposed in the Pfizer vaccine trial are serious and render all claims about vaccine safety and effectiveness fraudulent, defective and null and void in law.

In Lord Denning's judgment in *Lazarus Estates Ltd v Beasley* [1956] it was pointed out that there has to be substantial evidence of fraud and an intent to commit fraud and that this fraud profited the fraudster in some way while imposing significant losses on the injured parties. The points stated below in this document which show counts of fraud and in our sworn affidavits and exhibits and other documentation filed in the High Court show that fraud has taken place in relation to the covid19 vaccines and their promotion, and that fraudsters have profited while imposing massive losses on the injured parties. The high social status of the fraudsters does not confer legal immunity for frauds, crimes and related losses imposed on the injured parties.

Fraud has been corroborated from many different sources in documents and evidence we supplied to the High Court since November 2022. Fraud is proven here and detailed in these aforementioned documents and evidence and in the points below in this document. Courts have ruled that Fraud vitiates everything in law as found by Lord Denning and other learned judges in many other court precedents in Ireland, Britain, other European countries, Australasia, and North America. The informed consent of parents and guardians and children is being undermined by serious fraud here. Fraud can overturn any indemnities offered to vaccine producers, including covid19 vaccine producers. It also overturns any legal protections of vaccinators, doctors, nurses, elected politicians, Ministers, and government advisors who promoted this fraud.

Fraud unravels everything, including contracts, international contracts between governments and (vaccine) corporations, indemnities for vaccine companies and other types of businesses and individuals, laws, government policies, Ministerial protections, corporation sole protections, parliamentary protections or Dail protections, national and international agreements, government policies and laws promoting and administering covid19 vaccines and boosters, decisions of medical councils, financial gains and assets made through fraud, etc.

In this context the High Court has the power to use this precedent in our court case and to implement the Injunction we request and any other measures the High Court deems fit in the circumstances to protect the Irish people and nation and the Common Good.

2. Intent to commit Fraud and the Ingredients of Fraud in this case

The Intent to commit fraud and the ingredients of fraud will be examined in some detail here in this document. Intent also known by the Legal Latin term “Mens Rea” in courts worldwide is an important ingredient of fraud and any other crimes. We will examine Intent below.

Their Intent to commit fraud and the ingredients of fraud including obtaining informed consent for vaccines by non disclosure, false pretences, fraudulent misrepresentation, deception and fraud are clear from the following actions they took:

(i) ban and block safe and effective medical treatments for covid19 since May 2020 and create an artificial demand for lockdowns and covid19 vaccines. And they placed the lives of many people in danger from the covid19 infection through

(a) refusal to provide early treatment for covid19. They told covid19 patients to go home and isolate. In contrast to this, some medical doctors of the FLCCC including Dr. Pierre Kory in the USA had great success with early treatments for covid19 using the medical treatments in point (b) below.

(b) the banning and blocking of safe and effective medical treatments for covid19 since May 2020.

Evidence of this has been produced in our affidavits, exhibits, statement of truth and books of evidence filed in the High Court since November 2022 and will be provided by Expert Witnesses to the court. The laws and rules around Informed Consent state that alternatives to vaccines or medical drugs must be provided to the person before administering a vaccine or a drug. This was not done in Ireland. Denial of safe and effective treatments for an illness, covid19 in this case, so as to create an artificial demand for an experimental vaccine is an ingredient of Fraud in this case. Fraud in this case has a Domino Effect leading to further frauds and wrong doing.

The covid19 vaccines were given ‘Conditional marketing authorisation’ by the EMA in 2020 which the EMA claims is to “address unmet medical needs”.

Source: <https://www.ema.europa.eu/en/human-regulatory/marketing-authorisation/conditional-marketing-authorisation>

And the EMA used the following criteria

- the benefit-risk balance of the medicine is positive;
- it is likely that the applicant will be able to provide comprehensive data post-authorisation;
- the medicine fulfils an unmet medical need;
- the benefit of the medicine's immediate availability to patients is greater than the risk inherent in the fact that additional data are still required.

Let us examine how these EMA criteria and regulations have been breached:

- The EMA was incorrect and wrong, as the medical need had been met since May 2020, where many thousands of lives had been saved through the use of safe and effective medicines for treating covid19. These safe and effective medical drugs for treating and curing covid19 are listed in our affidavits and exhibits and books of evidence filed in the court since November 2022. Dr. Pierre Kory who used these medicines to successfully treat many covid19 patients in the USA will testify as an Expert Witness for us in this High Court case. For example, in India it is estimated that Ivermectin saved millions of lives from covid19. But there were unlawful and illegal attempts in Europe and North America to block, ban and censor these safe and effective medical treatments. In addition to use of these safe and effective medical drugs, recovered individuals had stronger natural immunity including T-cell memory which scientific studies have found is far superior to vaccine induced immunity.

It was against the regulatory criteria and rules of the EMA and also illegal and unlawful to give conditional marketing authorisation for a covid19 vaccine when there were safe and effective medical drugs for treating covid19.

- Non Disclosure of the Pfizer internal documents filed with the FDA in the USA and Regulators in many countries including the FDA in the USA and the EMA in Europe and HPRA in Ireland. These Pfizer documents were filed with the Regulatory authorities, and thus should have been made available to the Irish public, but were not. These documents were supposed to be covered up and never released to the public. After one US Federal court case in Texas in 2021 this was changed to release them to the general public over 75 years. This was later amended by another court order in 2022 to release them immediately and deliver 55,000 pages every month to the public with a projected total release of all documents within 2 years. These Pfizer documents were released to the public from February 2022 onwards under this US court order in Texas in the USA in 2022. I enclose **Exhibit 113** which is a copy of this US court order. And a news report on Reuters confirms this, and this news was reported across most press and media, link to Reuters news item is at the following :

<https://www.reuters.com/legal/government/paramount-importance-judge-orders-fda-hasten-release-pfizer-vaccine-docs-2022-01-07/>

These Pfizer documents showed over 1,200 deadly illnesses, diseases, disabilities, and types of deaths caused by this vaccine. These filled 9 pages and are truly shocking. This certainly shows that the covid19 vaccines are NOT safe. And other Pfizer documents tracked many thousands of members of the public suffering serious illnesses and disabilities caused by this vaccine, including 1,223 people killed by the Pfizer covid19 vaccine and the 40,000 people who got serious injuries, illnesses and disabilities in the first 90 days of the vaccination of the general public.

This is in Exhibits 1 and 2 filed by us in the High Court.

I further say that these Pfizers internal Reports released under Federal court order in the USA in January 2022 continue to show that the covid19 vaccine causes serious illnesses and disabilities including autoimmune illnesses where the immune system attacks the organs in the human body.

All of the Pfizer internal documents can be downloaded at <https://phmpt.org/pfizers-documents/> which is **Exhibit 121** for the court

I cite the book produced by this team, the Daily Clout team in the USA which is a team of doctors and other experts who are examining these Pfizer documents totalling hundreds of thousands of pages. This book titled 'Pfizer Documents Analysis Reports' , and this is a compilation of the types of serious illnesses, disabilities and deaths caused by this vaccine and identified in Pfizer's own internal documents and trial data. This is **Exhibit 67** for this High Court case and there is a link to the book here at <https://dailyclout.io/product/war-room-dailyclout-pfizer-documents-analysis-volunteers-reports/>

This team of experts, the Daily Clout, produced Report 66 titled '1,077 Immune-Mediated/Autoimmune Adverse Events in First 90 Days of Pfizer mRNA "Vaccine" Rollout, Including 12 Fatalities. Pfizer Undercounted This Category of Adverse Events by 270 Occurrences'.

This has had serious adverse consequences for many vaccinated people. This is further proof that the covid19 vaccine is not safe and that the vaccine induced mass production of spike proteins in the human body is the main factor in this unsafety. Myocarditis and Pericarditis were included in this Report 66.

Source: <https://dailyclout.io/report-66-1077-immune-mediated-autoimmune-adverse-events-in-first-90-days-of-pfizer-mrna-vaccine-rollout-including-12-fatalities-pfizer-undercounted-this-category-of-adverse-events-by-270-occurrences/>

All of the Daily Clout Reports into the covid19 vaccine harms, damage and types of death identified in the Pfizer internal documents can be downloaded at <https://dailyclout.io> . This is **Exhibit 119** for the court.

These risks of serious illnesses, disabilities and deaths from the vaccine were NOT disclosed by the Irish government and health authorities to the general public and to vaccine recipients in Ireland. Indeed there was a deliberate attempt by Pfizer and the Regulators in North America and Europe to hide and conceal these documents and never reveal them to the public.

- Historically, vaccine companies and medical doctors have been reluctant to vaccinate pregnant women due to fears for the health and safety of the unborn child, yet Pfizers own internal documents released under court order in the USA showed serious dangers for pregnant women and their unborn children, including spontaneous abortions and other types of child losses within 90 days of the rollout of the

covid19 vaccinations. One Pfizer internal document released under Federal court order in the USA and titled 'PREGNANCY AND LACTATION CUMULATIVE REVIEW' viewable at

https://phmpt.org/wp-content/uploads/2023/04/125742_S2_M1_pllr-cumulative-review.pdf

filed with the Regulators including the FDA in the USA and the EMA in Europe and HPRA in Ireland shows the dangers of the Pfizer covid19 vaccine to pregnant women and their unborn babies. These dangers were not revealed to the general public by Pfizer or by the FDA in the USA and the EMA in Europe and HPRA in Ireland when they became known in April 2021. These dangers were concealed, hidden and covered up, while the Regulators in Europe, Ireland, the USA and other countries and the Irish government and health authorities claimed the vaccine was "safe and effective" and encouraged pregnant women to get vaccinated.

Up to 28 February 2021, 673 cases were identified involving pregnant or breast feeding women. 458 of these involved vaccine exposure to the mother or fetus during pregnancy and 215 involved exposure during breast-feeding. (Remember all the fact checkers saying babies can't be exposed during breast-feeding, even though Pfizer had this data).

Out of the 458 cases involving exposure to the mother or fetus, 210 were reported with no associated adverse events. Of the remaining 248 cases there were 53 spontaneous abortions which represents 12% of the total.

It should be noted that pregnant women were excluded from the Pfizer covid19 vaccine trial as there were fears of damage to the women and /or unborn baby. This means the mass vaccinations of pregnant women was an illegal and unlawful experiment on pregnant women and their unborn babies. The Regulators including the EMA in Europe and the HPRA in Ireland and the FDA in the USA had access to this document but refused to regulate properly and refused to withdraw this vaccine for pregnant women and children. The deliberate non disclosure of this to general public promoted deprivation of full informed consent and the vaccine fraud.

These risks of serious illnesses, disabilities and deaths from the vaccine were NOT disclosed by the Irish government and health authorities to the general public and to vaccine recipients in Ireland. Indeed there was a deliberate attempt by Pfizer and the Regulators in North America and Europe to hide and conceal these documents and never reveal them to the public.

- **I say that Pfizer internal documents and documents they submitted to the FDA in the USA and to the EMA in Europe did not disclose to the public the details about a trial of the vaccine on rats which showed that the vaccine was unsafe and carried serious risks.**

In the USA, ICAN's attorneys reviewed a startling 2,237-page report from June 2020 (amended in

September 2020) that Pfizer submitted to the FDA concerning its mRNA COVID-19 vaccine. The study looked at the toxicity of Pfizer's vaccine using four different doses (including the one eventually authorized for emergency use, BNT162b2) and involved 255 rats (219 received vaccine, 36 received control) for a test period of 10 to 17 days with "3 additional weeks for the animals scheduled for the recovery period."

While the Pfizer claims in the report that the rats tolerated the vaccines "without evidence of systemic toxicity," its detailed findings indicate that was anything but the truth, as the following issues in major organs groups were observed:

- Enlarged spleens
- Enlarged adrenal glands
- Enlarged lymph nodes
- Kidney and liver congestion
- Increased fibrinogen concentration

And two rats died during the study, this was 1% of them. The study was 6 weeks only, and was very short term and did not assess the risks and deaths from the vaccine over the medium term and long term. The damage to the organs of the rats and the excessive blood clotting would have lead to premature deaths for many of the rats over the medium to long term. The same effects are now being observed in vaccinated humans.

All of these issues clearly show effects beyond the injection site. Of particular concern is the increased fibrinogen concentration; fibrinogen is made in your liver and helps your blood clot. Increased fibrinogen is associated with blood clotting, heart disease, blood vessel dysfunction, heart attacks and stroke. These issues were also seen with the dose level that was eventually licensed for humans.

Link to the Report:

https://icandecide.org/wp-content/uploads/2023/03/125742_S1_M4_4.2.3.2-38166.pdf

This is Exhibit 107 for the High Court.

Published scientific studies in 2022 and into 2023 show that vaccinated people are dying from systemic inflammation in most of their organs including the heart and brain. Pathology reports from Germany and Japan confirm this. The spike proteins which are distributed to most of the organs in the body are implicated in these deaths. This is referenced in this document and in our statement of truth and affidavits filed with the court.

- the EMA in European Union and the HPRA in Ireland and NIAC in Ireland and the Irish government and health authorities all claimed that the lipid nanoparticles, mRNA and spike proteins remained at the injection site or in the arm, and were quickly eliminated from the body. I cite information on the Irish

government web site at <https://www.gov.ie/en/press-release/e7965-minister-for-health-welcomes-green-light-for-pfizerbiontech-covid-19-vaccine/>

“the mRNA from the vaccine does not stay in the body but is broken down shortly after vaccination”

and the EMA also stated this on its web site at <https://www.ema.europa.eu/en/news/ema-recommends-covid-19-vaccine-moderna-authorisation-eu>

“The mRNA from the vaccine does not stay in the body but is broken down shortly after vaccination.”

The EMA, the HPRA, NIAC and HSE are liars, proven liars in this case. They made false statements as Pfizer documents submitted to the EMA in Europe and the HPRA in Ireland and other regulators around the world in January 2021, showed that the lipid nanoparticles, mRNA and spike proteins were distributed to most organs in the body and accumulated in them for a long period of time. This accumulation in the organs presented a significant risk to the health and life of vaccinated persons which was not disclosed to people before vaccination. None of this was disclosed to the general public and to people before they got covid19 vaccinations and boosters. This Non Disclosure to the general public was serious and has had serious implications and it amounts to obtaining informed consent by non disclosure, false pretences, deception and fraud.

These facts were detailed in Points 37 and 38 of our affidavit filed in the High Court in January 2023 and in the Statement of Truth filed in 2023. I cite the scientific paper referenced this affidavit

‘A Tissue Distribution Study of a [3H]-Labelled Lipid Nanoparticle-mRNA Formulation Containing ALC-0315 and ALC-0159 Following Intramuscular Administration in Wistar Han Rats’

referenced in Pfizer covid19 vaccine trial documents and viewable on

https://phmpt.org/wp-content/uploads/2022/03/125742_S1_M4_4223_185350.pdf

which can also be found in the long list of confidential Pfizer documents that the FDA have been forced to publish via a US federal court order here at

<https://phmpt.org/pfizers-documents/>

This scientific paper found that the vaccine contents, the lipid nanoparticles, the mRNA and spike proteins, accumulate in most of the body's organs. This study was carried out on Wistar Han rats, 21 of which were female and 21 of which were male. Each rat received a single intramuscular dose of the Pfizer Covid-19 injection and then the content and concentration of total radioactivity in blood, plasma and tissues were determined at pre-defined points following administration. In other words, the scientists conducting the study measured how much of the Covid-19 injection has spread to other parts of the body such as the skin, liver, spleen, heart etc. it showed that the mRNA and spike proteins accumulated in most of the organs in the body. The charts below shows this:

Sample	Total Lipid concentration (µg lipid equivalent/g [or mL]) (males and females combined)						
	0.25 h	1 h	2 h	4 h	8 h	24 h	48 h
Lymph (mandibular)	0.064	0.189	0.290	0.408	0.534	0.554	0.727
Lymph node (mesenteric)	0.050	0.146	0.530	0.489	0.689	0.985	1.37
Muscle	0.021	0.061	0.084	0.103	0.096	0.095	0.192
Ovaries (females)	0.104	1.34	1.64	2.34	3.09	5.24	12.3
Pancreas	0.081	0.207	0.414	0.380	0.294	0.358	0.599
Pituitary gland	0.339	0.645	0.868	0.854	0.405	0.478	0.694
Prostate (males)	0.061	0.091	0.128	0.157	0.150	0.183	0.170
Salivary glands	0.084	0.193	0.255	0.220	0.135	0.170	0.264
Skin	0.013	0.208	0.159	0.145	0.119	0.157	0.253
Small intestine	0.030	0.221	0.476	0.879	1.28	1.30	1.47
Spinal cord	0.043	0.097	0.169	0.250	0.106	0.085	0.112
Spleen	0.334	2.47	7.73	10.3	22.1	20.1	23.4
Stomach	0.017	0.065	0.115	0.144	0.268	0.152	0.215
Tests (Males)	0.031	0.042	0.079	0.129	0.146	0.304	0.320
Thymus	0.088	0.243	0.340	0.335	0.196	0.207	0.331
Thyroid	0.155	0.536	0.842	0.851	0.544	0.578	1.00
Uterus (females)	0.043	0.203	0.305	0.140	0.287	0.289	0.456
Whole blood	1.97	4.37	5.40	3.05	1.31	0.909	0.420
Plasma	3.97	8.13	8.90	6.50	2.36	1.78	0.805
Blood: plasma ratio	0.815	0.515	0.550	0.510	0.555	0.530	0.540

Table 1 Mean (Sexes-Combined) Concentration of Total Radioactivity in Whole Blood, Plasma and Tissues Following Single Intramuscular Administration of [³H]-08-A01-C01 to Wistar Han Rats

Target Dose Level: 50 µg mRNA/Animal; 1.29 mg Total Lipid/Animal

Results expressed as total lipid concentration (µg lipid equiv/g (mL)) and % of administered dose

Sample	Total Lipid Concentration (µg lipid equiv/g (or mL))							% of Administered Dose						
	0.25 min	1 h	2 h	4 h	8 h	24 h	48 h	0.25 min	1 h	2 h	4 h	8 h	24 h	48 h
Small intestine	0.030	0.221	0.476	0.879	1.279	1.302	1.472	0.024	0.130	0.319	0.543	0.776	0.906	0.835
Spinal cord	0.043	0.097	0.169	0.250	0.106	0.085	0.112	0.001	0.002	0.002	0.003	0.001	0.001	0.001
Spleen	0.334	2.471	7.734	10.296	22.091	20.080	23.353	0.013	0.093	0.325	0.385	0.982	0.821	1.030
Stomach	0.017	0.065	0.115	0.144	0.268	0.152	0.215	0.006	0.019	0.034	0.030	0.040	0.037	0.039
Testes (males)	0.031	0.042	0.079	0.129	0.146	0.304	0.320	0.007	0.010	0.017	0.030	0.034	0.074	0.074
Thymus	0.088	0.243	0.340	0.335	0.196	0.207	0.331	0.004	0.007	0.010	0.012	0.008	0.007	0.008
Thyroid	0.155	0.536	0.842	0.851	0.544	0.578	1.000	0.000	0.001	0.001	0.001	0.001	0.001	0.001
Uterus (females)	0.043	0.203	0.305	0.140	0.287	0.289	0.456	0.002	0.011	0.015	0.008	0.016	0.018	0.022
Whole blood	1.970	4.369	5.401	3.049	1.314	0.909	0.420	-	-	-	-	-	-	-
Plasma	3.965	8.132	8.903	6.503	2.360	1.783	0.805	-	-	-	-	-	-	-
Blood:plasma ratio	0.815	0.515	0.550	0.510	0.555	0.530	0.540	-	-	-	-	-	-	-

- =Partial tissue taken therefore not applicable/not applicable

Exhibit 126 has tables of the Bio-distribution of the lipid nanoparticles, mRNA and spike proteins in the human body

In the first 15 minutes following injection of the Pfizer jab, researchers found that the total lipid concentration in the ovaries measured 0.104ml. This then increased to 1.34ml after 1 hour, 2.34ml after 4 hours, and then 12.3ml after 48 hours.

The scientists, however, did not conduct any further research on the accumulation after a period of 48 hours, so we simply don't know whether the concerning accumulation continued. The accumulation in the ovaries is very serious especially for women of child bearing age and the scientific and statistical findings in 2021 and 2022 confirm this. And the accumulation in the testes has very serious implications for men and young boys. The accumulation in most of the body's organs has serious consequences for men, women and children.

This same scientific paper was available to regulators in many countries worldwide, for example the Australian regulator called the 'TGA' has released this same document which was known to them since January 2021. They have a link to this at <https://www.tga.gov.au/sites/default/files/foi-2389-06.pdf> and **this is Exhibit 152 for the court**. A video lecture about this was provided by Dr. John Campbell in England at <https://www.youtube.com/watch?v=fVNFFtmb9gA>

A recent scientific study published in April 2023 and being peer reviewed in 2023 shows that the spike proteins gets distributed to most organs in the body. This confirms the findings above. I cite this scientific paper below:

SARS-CoV-2 Spike Protein Accumulation in the Skull-Meninges-Brain Axis: Potential Implications for Long-Term Neurological Complications in post-COVID-19

Rong et al. 2023

<https://www.biorxiv.org/content/10.1101/2023.04.04.535604v1>

Another scientific paper in 2023 found Circulating Spike Protein Detected in Post-COVID-19 mRNA Vaccine Myocarditis. This further confirms and validates the findings above. I cite the scientific paper below:

Circulating Spike Protein Detected in Post-COVID-19 mRNA Vaccine Myocarditis

Yonker et al. 2023

<https://pubmed.ncbi.nlm.nih.gov/36597886/>

This is extremely important as autopsy reports of dead covid19 vaccinated people have confirmed spike protein damage to organs and vessels in the body, and this is damaging and killing people. Dr. Arne Burkhardt, a top Pathologist, has made these findings in Germany. Scientific studies show accumulation, autoimmune reactions and inflammation in the heart, the brain and blood vessels. The risk of systemic autoimmune reactions over months possibly years is present. Spike proteins have been found circulating throughout the body in children and adults for months after vaccination. This is referenced in affidavits, exhibits, statement of truth and books of evidence filed in the court and in points below. A recent scientific paper published and being peer reviewed in 2023 shows that this is the case, I cite it below:

Autoimmune Inflammatory Reactions Triggered by the COVID-19 Genetic Vaccines in Terminally Differentiated Tissues

McCullough et al. 2023

<https://www.preprints.org/manuscript/202303.0140/v1>

A news report about this at

<https://www.conservativewoman.co.uk/vaccine-damage-is-now-indisputable-say-top-scientists/>

There was a US Congressional hearing about this in March 2023, which is in our Statement of Truth filed in the court in 2023. In support of this I further say that in its most recent Covid booster advice, the Australian Technical Advisory Group on Immunisation (ATAGI) finally acknowledged that for healthy young people, the risks may outweigh the benefit:

"Adolescents and younger adults have a lower age-related risk of severe COVID-19, and a comparatively

higher risk of myocarditis following vaccination.”

Source: <https://www.health.gov.au/news/atagi-2023-booster-advice#:~:text=Overview,aged%2065%20years%20and%20over>

news report at <https://rebekahbarnett.substack.com/p/high-risk-low-benefit-of-covid-boosters>

I further say that vaccine companies, including Pfizer rely on investors and investor's expectations and this itself is based on information, on the evidence and the facts. Seeking Alpha is one of the most successful investment advice services in the world, and they provide important information and data to investors, brokers, shareholders, business people and bankers in Wall Street in the USA, the City of London, Paris, Frankfurt, Tokyo, and other high profile financial market places. They have provided recent investment information about Pfizer in the context of their covid19 vaccines. Their information corroborates our points in this affidavit concerning the covid19 vaccines. I quote Seeking Alpha:

“This TGA report assesses Pfizer's (NYSE:PFE) pre-clinical data, and was available to regulatory authorities in January 2021, prior to the vaccine rollout. The ramifications of this data are only now becoming appreciated by the general public, since it contradicts data provided by the large-scale human trials. During the last quarterly conference call, Pfizer forecast continuing high earnings from its mRNA vaccine segment. As there is this new data in the public domain together with large price hikes planned, the ambitious revenue targets for the vaccine would appear to be unrealistic.

... on page 44 [of the TGA report] we can read that the lipid capsules that carry the components for the manufacture of the “spike” protein are widely distributed after injection. What this means is that these capsules can deliver the mRNA vaccine to virtually any cell in the body. Once a cell in the body begins manufacture of the spike protein, inflammation occurs, that is to say, the body releases chemicals that trigger an immune response. In medical terms, such an event is given the suffix “itis.” For example, the heart has a protective membrane around it called the pericardium. In pericarditis, the pericardium gets inflamed and is often caused by a viral infection. Now, if you take a look at Pfizer's data, you will find a considerable number of such “itis’.”

There is also conflicting information concerning efficacy. On page 4 ... This data infers that there was almost zero protection against SARS-CoV-2 infection provided by Pfizer's vaccine as compared to unvaccinated primates.

The above is not the only troubling data in the report, but the material above gives a flavour of the content therein.

If indeed the above were true, one would reasonably expect a large number of vaccinated individuals to become sick with some “itis” or other. And in fact, as described by Pfizer's own data, there is an extravagant collection of such issues. In my article, *'HCA Healthcare: An Investment For Interesting*

Times', I speculate the interesting phenomenon of increasing poor health, by strange coincidence, from the commencement of mass vaccination for COVID.

I might also point out that, in my opinion, this increase in poor health may benefit Pfizer's other range of products in some areas of disease, the silver lining in the cloud for investors.

To Sum Up

It is entirely possible that Pfizer's targets for mRNA vaccine uptake will fail to materialise as the general populace consider the consequences to receiving an inoculation. However, there is always the possibility that governments may make a vaccination mandatory, despite the potential risks. Also, if one accepts Pfizer's assertion that sales of non-COVID related products will increase, by over 7%, PFE stock would be a hold rather than a sell, especially given the increase in illnesses."

Source: *Pfizer: Don't Bank On mRNA Vaccines*, Seeking Alpha, 1 April 2023

and <https://popularrationalism.substack.com/p/wall-street-wakes-up-pfizer-dont>

and <https://seekingalpha.com/article/4569880-hca-healthcare-an-investment-for-interesting-times>

Our affidavits and exhibits and statement of truth and books of evidence filed in the High Court show that this Bio-distribution of the lipid nanoparticles, mRNA and spike proteins in the human body has had serious consequences for men, women and children and also pregnant women and their unborn children.

This Non Disclosure of Biodistribution of lipid nanoparticles, mRNA and spike proteins to most organs in the human body and the accompanying risks to the health and lives of vaccinated people is serious and was known to Pfizer and Regulatory authorities in January 2021, and this has had serious implications for many people and it amounts to obtaining informed consent by non disclosure, false pretences, deception and fraud.

- **The consequences of the Biodistribution of lipid nanoparticles, mRNA and spike proteins to most organs in the human body were very serious - the Pathology evidence and Autopsy evidence. And there was Non Disclosure of this to the general public including those people who got the vaccines.**

Dr. Arne Burkhardt and his team of top Pathologists in Germany and Pathologists in Japan and other countries have found evidence that strongly suggests that the covid19 vaccines are distributing mRNA to most organs in the body and there is mass production of spike proteins in most organs of the body and also in the blood vessels and the immune system cells are attacking the spike proteins in the organs of the body, creating severe inflammation in the organs and in the blood vessels. It resembles autoimmunity where the immune system attacks the body's organs, tissues and/or blood vessels. This is leading to deaths, including sudden deaths. In Spring 2022, all Coroners and Pathologists around Ireland were given

information from Pathologists in Germany who discovered how the covid19 vaccines were killing people. But Irish pathologists and coroners have been blocked or banned from carrying out autopsies and post mortems on those people suspected of being killed by the vaccine. These autopsy methods have been developed by Dr. Arne Burkhardt and his team, some of the top Pathologists in Germany. These Pathology findings can be used in any country. I attach this Pathology documentation and information below

- Exhibit 7a for the court - German Pathology findings
- Germany Pathologist Findings at <https://pathologie-konferenz.de/en/>
- Dr. Arne Burkhardt's qualification, expertise, career and experience at <https://prabook.com/web/arne.burkhardt/42818>
- Dr. Arne Burkhardt - Pathology of vaccine deaths and vaccine injuries at https://odysee.com/@en:a5/Pathology-Conference_Burkhardt_Presentation_EN_20220311:7
- Dr. Arne Burkhardt - 2nd Conference on Vaccine Adverse Events Sept 18 2022 at <https://odysee.com/@LongXXvids:c/Prof-Arne-Burkhardt---2nd-Vax-Injury-Conference---Part-1:1?&sunset=lbrytv>

Here is the English language translation of Dr. Burkhardt's presentation at http://docs.shortxxvids.com/docs/Prof_Burkhardt_Nov2022_en_final.docx

- Dr. John Campbell analyses the Pathology findings of Dr. Arne Burkhardt at <https://www.youtube.com/watch?v=kEE5OfiVS7o>

These are all included in Exhibit 117 for the court

Japanese Pathology findings for a 14 year old girl killed by the covid19 vaccine at <https://www.sciencedirect.com/science/article/pii/S1344622323000548?via%3Dihub>

The title of this scientific paper is below:

A case of fatal multi-organ inflammation following COVID-19 vaccination

Nushida et al. 2023

<https://www.sciencedirect.com/science/article/pii/S1344622323000548?via%3Dihub>

This is a very important scientific study from Japan published in 2023 provides autopsy evidence that the covid19 vaccination caused multi organ inflammation and damage and sudden death in a 14 year old girl, shortly after she received the third covid19 vaccine. She had been healthy and fit prior to getting her covid19 vaccinations. The symptoms began after her first vaccination and worsened after each vaccination. The autopsy findings showed severe inflammation in her heart, lungs, liver, kidney, diaphragm, stomach, duodenum, and bladder, and the scientists provided photographic evidence of this. This correlates to other autopsy findings in Germany where there were similar findings in dead covid19 vaccinated people. We have cited them in prior affidavits and exhibits filed in the High Court.

The evidence strongly suggests that the covid19 vaccines are distributing mRNA to most organs in the body and there is mass production of spike proteins in most organs of the body and also in the blood vessels and there is strong scientific of this (see points below), and the immune system cells are attacking the spike proteins in the organs of the body, creating severe inflammation in the organs and in the blood vessels. It resembles autoimmunity where the immune system attacks the body's organs, tissues and/or blood vessels. We have provided evidence from Pfizer's own internal documents that the mRNA and spike proteins get distributed to all organs in the body to this court. This severe damage to the body's organs is progressive and would have killed the 14 year old child within one to two years. There were no infections found in the body and no past medical history of autoimmune disease or allergies. The cause of this sudden death was vaccine-related myopericarditis, which led to severe arrhythmias and progressive heart failure. This was related to the severe inflammation of the heart cited above.

These are all included in **Exhibit 117** for the court

A lecture about this important scientific paper was provided by Dr. John Campbell and this is also in **Exhibit 117 for the court**. A lecture about this important scientific paper and its findings was provided by Dr. John Campbell at <https://www.bitchute.com/video/4jbzFv9l54zX/>

- Non Disclosure of the defects, flaws and fraud in the Pfizer covid19 trials of 2020 which are itemised in affidavits filed in the court in December 2022 and January 2023 and the statement of truth field in the court in 2023. And cited above in this document. Including the flaws and frauds in the covid19 vaccine trial identified by Brook Jackson which is before the federal courts in the USA. This breached the rules and regulations of the EMA in Europe and the FDA in the USA and other regulators worldwide. The Regulator approval for the covid19 vaccine was based on fraud. All Pfizer and government and regulator claims about vaccine safety and effectiveness are based on a trial which was defective, flawed and fraudulent.
- Many social groups and people with certain illnesses were excluded from the Pfizer vaccine trial, so the vaccine was never tested on them. A list of such groups and illnesses is available online at https://www.nejm.org/doi/suppl/10.1056/NEJMoa2110345/suppl_file/nejmoa2110345_protocol.pdf and **this is Exhibit 118 for the court**

Yet this same vaccine was given to these social groups and people with certain illnesses during mass vaccinations of the public. There was non disclosure of this to these social groups and people with certain illnesses and the general public. This means they were experimented on with untested vaccines for them which could worsen their health condition or illness. This amounted to fraud and has put lives at risk in Ireland and other countries. This makes the EMA and HPRA authorisation for the covid19 vaccines fraudulent as they were based on fraud. Regulators including the EMA and HPRA should not be involved in fraud or aiding and abetting fraud.

➤ **For these covid19 vaccines there were**

- no toxicity studies
- no genotoxicity studies
- no reproductive toxicity studies
- no cardio toxicity studies
- no autoimmunity studies
- no juvenile paediatric studies
- no immuno toxicology studies
- no carcinogenic studies and no tumorigenicity studies

And there were no medium term and long term safety tests carried out on the covid19 vaccines and boosters. All government, health authority and regulator claims about the covid19 vaccines being “safe” were NOT backed up by scientific and medical evidence and were fraudulent. This makes the EMA and HPRA authorisation for the covid19 vaccines fraudulent as they were based on fraudulent claims.

- I say that the FDA in the USA and the EMA in Europe and the HPRA, NIAC and the Minister for Health in Ireland approved covid19 vaccinations for pregnant women when there were no scientific trials of the vaccine on pregnant women to establish if they were safe or not for pregnant women and their unborn children. This was criminal when one considers the massive damage done by these vaccines to pregnant women and their unborn children. Pfizer started a trial for pregnant women in Spring 2021 many months after covid19 vaccines were approved for all adults including pregnant women. As of February 2023, Pfizer have not released any data or the results of this trial. Two years have passed and no results have been given to the public. This non Disclosure appears to be a cover up. I cite news report about this from Mary Anne Demasi below.

<https://maryannedemasi.substack.com/p/exclusive-whatever-happened-to-pfizers>

I further say that Pfizer documents and Pfizer clinical studies and scientific research papers show that the covid19 vaccines were dangerous to pregnant women and their unborn children and this was known since Spring 2021 but Pfizer, and the FDA in USA and the EMA in Europe and the HPRA in Ireland promoted covid19 vaccinations for pregnant women and refused to warn them about these dangers. . This has been publicly exposed by Dr. Ah Kahn Syed. He cites and details 3 important points to confirm this.

1. Pfizer's PSUR document
2. The Pfizer-BNT Preclinical studies
3. James Thorpe and the VAERS reports

Dr. Ah Kahn Syed 's analysis and report is at

<https://arkmedic.substack.com/p/the-miscarriage-of-medicine>

This also has serious implications for pregnant women and for girls aged 5 to 11 who will mature into women.

Our affidavits and exhibits and statement of truth and books of evidence filed in the High Court show that this has had serious consequences for pregnant women and their unborn children.

- I further say that on the topic of "Information is Power", it is equally true that concealment of information and Non Disclosure of information disempowers the people, and places their lives at serious risk of injury, illness, disability or death from vaccines. On this very point, an official EU Safety Report on the Pfizer mRNA vaccine reveals damning data and corroborates our evidence that the covid19 vaccines are not safe and have caused a high number of injuries, illnesses, disabilities and deaths. Many illnesses and disabilities caused by the covid19 vaccine were identified in the Pfizer trial and also in the post authorisation period. This EU Report was kept secret and hidden from the general public. It was only released via an FOIA request and then provided to the public by an anonymous person, being provided to the Austrian science and political blog, TKP.

The following is an overview of the total number of cases - post-marketing and clinical trial data - of the 6 month reporting period:

- 327,827 case reports (individuals) containing 1,172,887 events (adverse events)
- Three times more cases reported for women than for men
- Highest number of reported cases in the 31-50 age group
- A third of all case reports were classified as serious
- 44% of case reports were classified with outcomes as either unknown or unresolved
- 84% of case reports had no history of comorbidities
- 5115 deaths occurred after vaccine was administered
- 46% of fatal outcome cases occurred in those without any comorbidities

22 people under 17 died, and had no underlying illnesses. Out of 26 pregnancy cases in the trial, 15 ended in miscarriages and 5 resulted in live births with birth defects.

A link to this EU Safety report is provided below and the report and video testimony of the person who got the report are on a dvd marked **Exhibit 92 for the High Court.**

Link to Report: https://tkp.at/wp-content/uploads/2023/01/1.PSUR_organic.pdf

Sources: <https://soniaelijah.substack.com/p/eu-safety-report-on-pfizer-biontech>

News report: <https://childrenshealthdefense.eu/eu-issues/emas-failure-to-pull-covid-19-jabs-even->

[though-risk-benefit-balance-nullified/](#)

and <https://twitter.com/i/status/1627446876671811584>

This important information was hidden from the public and kept secret and NOT provided by the EU authorities, the EMA and the Irish government and health authorities to the general public and to people who got covid19 vaccinations. There was NO full and valid informed consent for these vaccinations.

- The covid19 vaccines were in testing or experimental phase until mid 2023. A fact not communicated to the general public and vaccine recipients
- Full and Valid Informed consent was not given by members of the public for these vaccines. They were not told about the high number of vaccine injuries, illnesses, disabilities and deaths and not given other relevant and material information about the vaccine and the vaccine trial contained in this document and in our filed affidavits and exhibits and books of evidence. Evidence in this document and other documents we filed in the High Court show that informed consent was obtained by non disclosure, false pretences, deception and fraud.
- The Cost – Benefit for these vaccines was negative (costs higher than benefits) as recently found in official data and a scientific study in Britain in 2023. This is in **‘Exhibit 151 – Cost – Benefit analysis’** for the court. The EMA in Europe and HPRa failed to do a Cost-Benefit analysis and provide this to the public. The European Court of Justice has over the last 25 years demanded under the Precautionary Principle and Aarhus Convention that companies and governments and regulators carry out Cost-Benefit analysis for medical products and other products so as to protect the health and lives of the general public and those living in the lived environment. This was not done in this case.
- Another factor around informed consent involves the fact that those people who got the covid19 vaccinations were not told that the covid19 vaccine was unlicensed and experimental until mid 2023, and this means that full and valid informed consent was not given.
- Non Disclosure of the bad batches of covid19 vaccines which caused a higher rate of vaccine injuries, illnesses, disabilities and deaths as found and detailed on <https://www.howbadismybatch.com>
A new scientific paper in Denmark, found that 4.2 percent of Pfizer COVID-19 vaccine batches accounted for 71 percent of adverse events (SAEs), according to Danish researchers in a recent study published in the European Journal of Clinical Investigation on March 30, 2023. The study has raised more serious concerns about the inconsistencies in the quality of different vaccine batches and the implications for vaccine recipients. Bad vaccine batches and inconsistency in vaccine batches breaches European regulations and laws.

Batch-dependent safety of the BNT162b2 mRNA COVID-19 vaccine

- Vaccine manufacturing defects, quality control defects, and batch defects, the presence of undisclosed dangerous ingredients in the vaccines, and flaws and frauds in the Pfizer vaccine trial in 2020 identified by us in our sworn affidavits and exhibits and statement of truth and in this document further invalidated the vaccine and its approval.
- I say that Dr. Jessica Rose has publicly detailed serious defects in the covid19 vaccines and the approval process for these vaccines by the EMA in Europe which put the vaccinated public at risk of injury, illness and premature death and did not inform them about this and thus deprived them of full and valid informed consent.

Source: https://jessicar.substack.com/p/characterization-of-bnt162b2-mrna?utm_source=profile&utm_medium=reader2

And this has been confirmed by another scientist at <https://anandamide.substack.com/p/curious-kittens>
This is **Exhibit 123** for the court.

- The obtaining of informed consent for these vaccines by non disclosure, false pretences, fraudulent misrepresentation, deception and fraud detailed in sections below in this document.
- I further say the U.S. Food and Drug Administration (FDA) and the Centers for Disease Control and Prevention (CDC) cooperated to issue Emergency Use Authorizations (EUA) and roll out new, bivalent Pfizer and Moderna COVID-19 vaccines, without any human trials, which is unprecedented. The EMA in Europe has done similarly, and Ireland is impacted by this.

The new BA.4/5 bivalent vaccines were tested only in mice, not humans. Dr. Paul Offit a vaccine expert and advisor to the FDA and US government publicly objected to these vaccines. I cite CNN news channel:

“You can’t ask millions of people to get this booster dose without showing some human data that you have a dramatic increase in neutralizing antibodies to the BA.4/BA.5 strains as compared to boosting with the ancestral type,” Offit said, referring to the currently authorized shots based on the version of Covid that emerged in China, more than two years ago.

‘But some infectious disease and vaccine experts say the FDA should have waited for human data from the BA.5 shots before authorizing them. Dr. Paul Offit, a member of the FDA’s advisory committee, said data based on mice studies is not sufficient to justify authorizing the new boosters.’

“ “You have to show some evidence in people that the immune response that you’re getting with the

bivalent vaccine is clearly better, and those data haven't been presented," said Offit, an infectious disease and vaccine expert at Children's Hospital of Philadelphia.'

And a news report by a medical doctor in the USA, Dr. Meryl Nass confirms that this is the case and that bivalent boosters lack safety and effectiveness.

<https://childrenshealthdefense.org/defender/covid-boosters-no-human-trials/>

According to the Vaccine Research Center, "A study in nonhuman primates showed that an Omicron specific messenger RNA vaccine was not better than the original messenger RNA-1273 [ancestral Moderna] vaccine for protection against Omicron challenge." According to the Vaccine Research Center, the Omicron vaccines won't stimulate a good Omicron response due to antigenic priming, also known as original antigenic sin. This means the immune system has been programmed to respond over and over again to the first coronavirus infection or vaccine it encountered, even when it encounters different coronavirus antigens later. This corroborates our previous affidavits and books of evidence. Study cited below:

mRNA-1273 or mRNA-Omicron boost in vaccinated macaques elicits similar B cell expansion, neutralizing responses, and protection from Omicron.

Gagne et al. 2022

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8947944/pdf/main.pdf>

No proper safety and effectiveness studies on humans in RCT trials places the vaccine companies and FDA, the EMA and other regulators in legal difficulty as they failed to regulate and failed to adequately protect the general public. This is pure fraud and another ground for fraud.

➤ **Failure to Regulate**

As the covid19 vaccines caused large numbers of injuries, illnesses, disabilities and deaths worldwide in 2021, 2022 and into 2023, the EMA in Europe and the HPRA in Ireland

(i) refused to inform the general public about this. And refused to include this on Informed Consent forms given to vaccine recipients.

(ii) refused to properly investigate these injuries, illnesses, disabilities and deaths and establish how the vaccines were causing this. And refused to inform the general public

(iii) refused to conduct independent scientific research into the safety of the vaccines

(iv) refused to intervene to protect lives in 2021, 2022 and 2023 when it became clear that the vaccines were dangerous and causing high numbers of illnesses, disabilities and deaths

(v) it did not define tolerable safety limits of vaccines and medical drugs in terms of deaths, serious illnesses and disabilities

- (vi) refused to carry out independent and intensive electron microscope and spectroscopic investigations to establish all of the ingredients of the covid19 vaccines and publish a report for the general public
- (vii) no safety audits of the EMA

I further say that a groundbreaking new report sent to every member of the British Parliament in April 2023 by the Perseus group – a team of experts from the fields of medicine, science, pharmaceutical regulation and safety management – has set out in detail the numerous concerns raised by experts globally about the covid19 vaccines and the specific concerns about the U.K.'s Medicines and Healthcare products Regulatory Authority (MHRA) responsible for approving them. The failure of the Regulators to regulate in relation to covid19 vaccines and the great damage done to public health is exposed in this report. These experts have called an end to covid19 vaccinations and a national inquiry into this scandal.

Source: https://perseus.org.uk/wp-content/uploads/2023/04/Perseus_MHRA_Main-Report-1-1.pdf

This report exposes the failure of Regulators to regulate in relation to covid19 vaccines and is **Exhibit 122 for the court.**

Pfizer and other covid19 vaccine companies did not comply with the regulations and rules of the EMA. The Regulators including the EMA and HPRA did not comply with their own criteria, rules and regulations and laws governing them, indeed the EMA broke its own rules and regulations and engaged in fraud by authorising the vaccine and thus broke the law. The authorisation itself was based on fraud and was fraudulent. And the EMA failed to track the high number of vaccine injuries, illnesses, disabilities and deaths from Spring 2021 to the present in 2023, and take remedial actions to protect lives. The EMA did not even follow its own criteria, rules and protocols, and has acted outside the law and placed many lives in danger. And this has led to loss of many lives and to many people getting ill and disabled.

The non disclosure, false pretences, deception and fraud is very clear here.

(ii) promote PCR test frauds for covid19 which gave over 95% False Positives according to scientific studies and created an artificial demand for covid19 lockdowns and vaccines. This is detailed in our affidavits, exhibits, statement of truth and books of evidence filed in the High Court since November 2022. The whole covid19 vaccination program is predicated on this fraud and the mass panic and fear it caused. Fraud in this case has a Domino Effect leading to further frauds and wrong doing.

(iii) authorise, promote, and sell the covid19 vaccines and boosters and totally ignore all the risks and dangers associated with them regardless of the adverse consequences for the general public, and NOT disclose these risks and dangers to the general public and potential and actual vaccine recipients. Non Disclosure to the general public of the deaths, injuries, serious illnesses and disabilities caused by the covid19 vaccines which were detailed in the following:

- Non Disclosure to the Irish public of data in official government databases such as VAERS, V-Safe, DMED, MHRA, Eudravigilance, DAEN and others worldwide and official statistical reports worldwide of the large and record numbers of covid19 vaccine injuries, illnesses, disabilities and deaths, and the fact that these figures were far higher than all other vaccines over the last 50 years, and higher than all vaccines combined over a 30 year period. The general public were not informed about this, and indeed the majority of the public were and still are ignorant of these facts.

These covid19 vaccine injuries, illnesses, disabilities and deaths are detailed in our affidavits and exhibits filed in the High Court in November 2022 and December 2022 and January 2023 and our statement of truth filed in the High Court in April 2023 and books of evidence filed in the court in 2022 and 2023.

The massive rise in and number of vaccine injuries, illnesses, disabilities and deaths caused by the covid19 vaccines and registered on government databases worldwide including VAERS, V-Safe, DMED, Eudravigilance, MHRA and others is detailed in the affidavits and exhibits we filed in the High Court since November 2022 and in our books of evidence proves that these covid19 vaccines are NOT safe. Yet these numbers are less than one tenth of the actual injuries, illnesses, disabilities and deaths according to scientific studies. So the real numbers are ten times worse ! In comparison to other vaccines and similar population numbers vaccinated in the past, the covid19 vaccines have been the deadliest in the last 50 years, and have had more illnesses, disabilities and deaths than other vaccines combined together over the last 30 years according to VAERS and other government databases. The Irish government and health authorities did not reveal these facts to the Irish people and those people who got vaccinated.

- In the USA, the DMED data for the US military is shocking showing a massive increase in vaccine injuries, serious illnesses, disabilities and deaths caused by covid19 vaccines to young, fit, strong and healthy US military personnel in 2021 and 2022. This has caused a massive national security problem for the USA. A US Senator Ron Johnson sent an important letter about this to the US Secretary of Defense demanding information on shockingly high COVID-19 vaccine injury among military personnel

You can read the letter here at this link :

<https://www.ronjohnson.senate.gov/services/files/FB6DDD42-4755-4FDC-BEE9-50E402911E02>

Senator Ron Johnson's letter confirmed lawyer Thomas Renz's presentation to the US Senate earlier. The Senator set a deadline for Secretary Austin to provide information regarding vaccine injury among military personnel until February 15, 2022. I quote from this letter:

"Based on data from the Defense Medical Epidemiology Database (DMED), Renz reported that these whistleblowers found a significant increase in registered diagnoses on DMED for miscarriages, cancer, and many other medical conditions in 2021 compared to a five-year average from 2016-2020.2 For

example, at the roundtable Renz stated that registered diagnoses for neurological issues increased 10 times from a five-year average of 82,000 to 863,000 in 2021,” Sen. Johnson wrote.

Senator Johnson included in his letter the following medical conditions presented by US lawyer Thomas Renz:

Hypertension – 2,181% increase

Diseases of the nervous system – 1,048% increase

Malignant neoplasms of esophagus – 894% increase

Multiple sclerosis – 680% increase

Malignant neoplasms of digestive organs – 624% increase

Guillain-Barre syndrome – 551% increase

Breast cancer – 487% increase

Demyelinating – 487% increase

Malignant neoplasms of thyroid and other endocrine glands – 474% increase

Female infertility – 472% increase

Pulmonary embolism – 468% increase

Migraines – 452% increase

Ovarian dysfunction – 437% increase

Testicular cancer – 369% increase

Tachycardia – 302% increase

These are stunning numbers.

At the end of his letter, Senator Johnson Secretary Austin the following questions:

Is DoD aware of increases in registered diagnoses of miscarriages, cancer, or other medical conditions in DMED in 2021 compared to a five-year average from 2016-2020? If so, please explain what actions DoD has taken to investigate the root cause for the increases in these diagnoses.

Have registered diagnoses of myocarditis in DMED been removed from the database from January 2021 to December 2021? If so, please explain why and when this information was removed and identify who removed it.

At an earlier US Senate hearing, several world-renowned doctors, scientists and medical experts spoke during a panel discussion titled “Covid-19: A Second Opinion” in Washington DC on January 24, 2022, which was hosted by Senator Ron Johnson (R-WI). During the event, Ohio attorney Thomas Renz

presented DOD medical billing data from the Defense Medical Epidemiology Database (DMED). Renz exposed the disturbing truth about what is happening to the health of our service members since the rollout of the jab a year ago. According to Renz, there was an astronomical increase in several serious illnesses and disorder diagnoses in the US military since the rushed rollout of the Covid-19 vaccine.

The whistleblowers came forward because of what they were seeing on the job as they treated military personnel, leading them to investigate the DMED system for anomalies related to the increase they had seen in their clinical experience, Renz said during the discussion. A video of this is available on

<https://rumble.com/embed/vqwbca/?pub=4>

You can read the US Senators letter here at

<https://www.ronjohnson.senate.gov/services/files/FB6DDD42-4755-4FDC-BEE9-50E402911E02>

In Autumn 2022, due to pressure from Senator Johnson and others, the US military ended the mandate for covid19 vaccinations. And several elected representatives across political parties in the US Congress are investigating the non disclosures and frauds associated with these covid19 vaccines and the massive number of injuries, serious illnesses and deaths caused by these vaccines.

These risks of serious illnesses, disabilities and deaths from the vaccine were NOT disclosed by the Irish government and health authorities to the general public and to vaccine recipients in Ireland.

- Non Disclosure of the dangerous and life changing side effects of the covid vaccines which amount to over 100 pages long according to the WHO database, Vigibase and other official sources. We provided this in an affidavit and exhibit to the court.
- Non Disclosure of the Pfizer internal documents filed with the FDA in the USA and Regulators in many countries including the EMA in Europe and HPRA in Ireland. These Pfizer documents were filed with the Regulatory authorities, and thus should have been made available to the Irish public, but were not. These documents were supposed to be covered up and never released to the public. After one US Federal court case in Texas in 2021 this was changed to release them to the general public over 75 years. This was later amended by another court order in 2022 to release them immediately and deliver 55,000 pages every month to the public with a projected total release of all documents within 2 years. These Pfizer documents were released to the public from February 2022 onwards under this US court order in Texas in the USA in 2022. I enclose **Exhibit 113** which is a copy of this US court order. And a news report on Reuters confirms this, and this news was reported across most press and media, link to Reuters news item is at the following : <https://www.reuters.com/legal/government/paramount-importance-judge-orders-fda-hasten-release-pfizer-vaccine-docs-2022-01-07/>

These Pfizer documents showed over 1,200 deadly illnesses, diseases, disabilities, and types of deaths caused by this vaccine. These filled 9 pages and are truly shocking. This certainly shows that the covid19 vaccines are NOT safe. And other Pfizer documents tracked many thousands of members of the public suffering serious illnesses and disabilities caused by this vaccine, including 1,223 people killed by the Pfizer covid19 vaccine and the 40,000 people who got serious injuries, illnesses and disabilities in the first 90 days of the vaccination of the general public.

This is in Exhibits 1 and 2 filed by us in the High Court.

I further say that these Pfizers internal Reports released under Federal court order in the USA in January 2022 continue to show that the covid19 vaccine causes serious illnesses and disabilities including autoimmune illnesses where the immune system attacks the organs in the human body.

All of the Pfizer internal documents can be downloaded at <https://phmpt.org/pfizers-documents/> which is **Exhibit 121** for the court

I cite the book produced by this team, the Daily Clout team in the USA which is a team of doctors and other experts who are examining these Pfizer documents totalling hundreds of thousands of pages. This book titled 'Pfizer Documents Analysis Reports' , and this is a compilation of the types of serious illnesses, disabilities and deaths caused by this vaccine and identified in Pfizer's own internal documents and trial data. This is **Exhibit 67** for this High Court case and there is a link to the book here at <https://dailyclout.io/product/war-room-dailyclout-pfizer-documents-analysis-volunteers-reports/>

This team of experts, the Daily Clout, produced Report 66 titled '1,077 Immune-Mediated/Autoimmune Adverse Events in First 90 Days of Pfizer mRNA "Vaccine" Rollout, Including 12 Fatalities. Pfizer Undercounted This Category of Adverse Events by 270 Occurrences'.

This has had serious adverse consequences for many vaccinated people. This is further proof that the covid19 vaccine is not safe and that the vaccine induced mass production of spike proteins in the human body is the main factor in this unsafety. Myocarditis and Pericarditis were included in this Report 66.

Source: <https://dailyclout.io/report-66-1077-immune-mediated-autoimmune-adverse-events-in-first-90-days-of-pfizer-mrna-vaccine-rollout-including-12-fatalities-pfizer-undercounted-this-category-of-adverse-events-by-270-occurr/>

Historically, vaccine companies and medical doctors have been reluctant to vaccinate pregnant women due to fears for the health and safety of the unborn child, yet Pfizers own internal documents released under court order in the USA showed serious dangers for pregnant women and their unborn children, including spontaneous abortions and other types of child losses within 90 days of the rollout of the covid19 vaccinations. I cite Pfizer document titled 'BNT162b2 Cumulative Review from

Pharmacovigilance Database' chapter titled 'PREGNANCY AND LACTATION CUMULATIVE REVIEW' on Page 1

Link is at

https://icandecide.org/wp-content/uploads/2023/04/125742_S2_M1_pll-r-cumulative-review.pdf

and also detailed in the affidavits we filed in the High Court in November and December 2022 and in January 2023. The Regulators including the EMA in Europe and the HPRA in Ireland and the FDA in the USA had access to this document but refused to regulate properly and refused to withdraw this vaccine for pregnant women and children.

All of the Daily Clout Reports into the covid19 vaccine harms, damage and types of death identified in the Pfizer internal documents can be downloaded at <https://dailyclout.io> . This is **Exhibit 119** for the court.

These risks of serious illnesses, disabilities and deaths from the vaccine were NOT disclosed by the Irish government and health authorities to the general public and to vaccine recipients in Ireland. Indeed there was a deliberate attempt by Pfizer and the Regulators in North America and Europe to hide and conceal these documents and never reveal them to the public.

- **I say that Pfizer internal documents and documents they submitted to the FDA in the USA and to the EMA in Europe did not disclose to the public the details about a trial of the vaccine on rats which showed that the vaccine was unsafe and carried serious risks.**

In the USA, ICAN's attorneys reviewed a startling 2,237-page report from June 2020 (amended in September 2020) that Pfizer submitted to the FDA concerning its mRNA COVID-19 vaccine. The study looked at the toxicity of Pfizer's vaccine using four different doses (including the one eventually authorized for emergency use, BNT162b2) and involved 255 rats (219 received vaccine, 36 received control) for a test period of 10 to 17 days with "3 additional weeks for the animals scheduled for the recovery period."

While the Pfizer claims in the report that the rats tolerated the vaccines "without evidence of systemic toxicity," its detailed findings indicate that was anything but the truth, as the following issues in major organs groups were observed:

- Enlarged spleens
- Enlarged adrenal glands
- Enlarged lymph nodes
- Kidney and liver congestion
- Increased fibrinogen concentration

And two rats died during the study, this was 1% of them. The study was 6 weeks only, and was very short term and did not assess the risks and deaths from the vaccine over the medium term and long term. The

damage to the organs of the rats and the excessive blood clotting would have lead to premature deaths for many of the rats over the medium to long term. The same effects are now being observed in vaccinated humans.

All of these issues clearly show effects beyond the injection site. Of particular concern is the increased fibrinogen concentration; fibrinogen is made in your liver and helps your blood clot. Increased fibrinogen is associated with blood clotting, heart disease, blood vessel dysfunction, heart attacks and stroke. These issues were also seen with the dose level that was eventually licensed for humans.

Link to the Report:

https://icandecide.org/wp-content/uploads/2023/03/125742_S1_M4_4.2.3.2-38166.pdf

This is Exhibit 107 for the High Court.

Published scientific studies in 2022 and into 2023 show that vaccinated people are dying from systemic inflammation in most of their organs including the heart and brain. Pathology reports from Germany and Japan confirm this. The spike proteins which are distributed to most of the organs in the body are implicated in these deaths. This is referenced in this document and in our statement of truth and affidavits filed with the court.

- Non Disclosure of over 1,200 published and peer reviewed scientific studies. These risks of serious illnesses, disabilities and deaths from the vaccine were NOT disclosed by the Irish government and health authorities to the general public and to vaccine recipients in Ireland. They were widely known by government and health and regulator authorities worldwide since April 2021.
- While the FDA, the CDC, the Department of Health in the USA were telling the public that the covid19 vaccines were safe and effective, the evidence on the VAERS system of the CDC was showing them that the covid19 vaccines were unsafe and were causing a record number of vaccine injuries, illnesses, disabilities and deaths, inside the first week of mass covid19 vaccinations, but they did not disclose these facts to the general public. General Dynamics who were the contractors for the VAERS system could not cope with the massive number, indeed record number of vaccine injuries, illnesses, disabilities and deaths in 2020 and 2021. This has been confirmed in FOI requests and in leaked emails and documents between the General Dynamics and the CDC for the period 2020 to 2022 cited below. This has been exposed on an American news station, The Highwire in March 2023. Lawyers acting for the news station The Highwire and ICAN also got possession of copies of the contracts and communications between General Dynamics and the CDC.

Also, an FOI request from CDC by Josh Guetzkow showed that the VAERS system was overwhelmed with record numbers of vaccine injuries, illnesses, disabilities and deaths by the end of January 2021, a mere 6 weeks into the mass covid19 vaccination programme. VAERS was projected to handle 1,000 reports

per day or 7,000 per week, but this quickly escalated to 2,000 per day, then 3,000, then 4,000 reports per day and the system quickly became backlogged for many months due to the massive number of reports received. According to contract documents released to ICAN lawyers, there was a backlog of 115,000 reports by February 2nd 2021 and extra staff had to be hired and more funding put in place to deal with this backlog. The contract was renegotiated to set a new target at 25,000 reports processed per week, this was an increase of 18,000 reports per week. This was 3,500 reports per day, which is 3.5 times higher than that expected when the vaccinations began in December 2020. By April, the backlog was at 75,000 reports and the reports kept coming in at 2000 to 3000 per day. This had never occurred for any other vaccine in the past, the covid19 vaccines set a new record for vaccine injuries, illnesses, disabilities and deaths which overwhelmed the CDC and its VAERS system. This was proof and evidence that the covid19 vaccines were unsafe, but this fact was concealed and hidden from the general public. Josh Guetzkow provided an analysis of this official data at <https://jackanapes.substack.com/p/the-banality-of-vaers>

Sources: The Highwire <https://thehighwire.com/ark-videos/the-vaers-expose/> and <https://www.bitchute.com/video/hKG63CX52C2U/>

Contract between General Dynamics and the CDC:

https://www.usaspending.gov/award/CONT_AWD_75D30120F09621_7523_47QTCK18D0003_4732

FOI data: raw data from General Dynamics - <https://jackanapes.substack.com/api/v1/file/c0ef992e-ecb5-40dd-a0f5-752e35775f4d.pdf>

and analysis of this data by Josh Guetzkow - <https://jackanapes.substack.com/p/the-banality-of-vaers> and <https://twitter.com/joshg99/status/1638095182582120449> -

The EMA in European Union and the HPRA in Ireland had access to the CDC databases and to this VAERS data but chose not to disclose these facts to the public in the Europe. Regulators throughout Europe also experienced pressure on their vaccine reporting systems due to a big increase in vaccine injuries, illnesses, disabilities and deaths but this was not disclosed to the general public. There were clear signals that the covid19 vaccines were unsafe and harming and killing many people, but this was deliberately concealed and hidden from the general public, while the EMA in Europe, the FDA and CDC in the USA and the HPRA in Ireland promoted the message of the vaccines being “safe and effective”.

This shows lies, deliberate deception and the use of false pretences to coax the public into getting covid19 vaccinations. This is another example of non disclosure to the public and the use of false pretences and deception to promote vaccines which they knew to be unsafe. This is fraud. This fraud led to the obtaining of informed consent for vaccines by non disclosure, false pretences, deception and fraud. And this led to mass killing of people and to mass disabling and illnesses for millions of people.

- the EMA in European Union and the HPRA in Ireland and NIAC in Ireland and the Irish government and health authorities all claimed that the lipid nanoparticles, mRNA and spike proteins remained at the injection site or in the arm, and were quickly eliminated from the body. I cite information on the Irish government web site at <https://www.gov.ie/en/press-release/e7965-minister-for-health-welcomes-green-light-for-pfizerbiontech-covid-19-vaccine/>

“the mRNA from the vaccine does not stay in the body but is broken down shortly after vaccination” and the EMA also stated this on its web site at <https://www.ema.europa.eu/en/news/ema-recommends-covid-19-vaccine-moderna-authorisation-eu>

“The mRNA from the vaccine does not stay in the body but is broken down shortly after vaccination.”

The EMA, the HPRA, NIAC and HSE are liars, proven liars in this case. They made false statements as Pfizer documents submitted to the EMA in Europe and the HPRA in Ireland and other regulators around the world in January 2021, showed that the lipid nanoparticles, mRNA and spike proteins were distributed to most organs in the body and accumulated in them for a long period of time. This accumulation in the organs presented a significant risk to the health and life of vaccinated persons which was not disclosed to people before vaccination. None of this was disclosed to the general public and to people before they got covid19 vaccinations and boosters. This Non Disclosure to the general public was serious and has had serious implications and it amounts to obtaining informed consent by non disclosure, false pretences, deception and fraud.

These facts were detailed in Points 37 and 38 of our affidavit filed in the High Court in January 2023 and in the Statement of Truth filed in 2023. I cite the scientific paper referenced this affidavit

‘A Tissue Distribution Study of a [3H]-Labelled Lipid Nanoparticle-mRNA Formulation Containing ALC-0315 and ALC-0159 Following Intramuscular Administration in Wistar Han Rats’

referenced in Pfizer covid19 vaccine trial documents and viewable on

https://phmpt.org/wp-content/uploads/2022/03/125742_S1_M4_4223_185350.pdf

which can also be found in the long list of confidential Pfizer documents that the FDA have been forced to publish via a US federal court order here at

<https://phmpt.org/pfizers-documents/>

This scientific paper found that the vaccine contents, the lipid nanoparticles, the mRNA and spike proteins, accumulate in most of the body’s organs. This study was carried out on Wistar Han rats, 21 of which were female and 21 of which were male. Each rat received a single intramuscular dose of the Pfizer Covid-19 injection and then the content and concentration of total radioactivity in blood, plasma and tissues were determined at pre-defined points following administration. In other words, the scientists conducting the study measured how much of the Covid-19 injection has spread to other parts of the body

such as the skin, liver, spleen, heart etc. it showed that the mRNA and spike proteins accumulated in most of the organs in the body. The charts below shows this:

2.6.5.5B. PHARMACOKINETICS: ORGAN
DISTRIBUTION CONTINUED

Test Art

Sample	Total Lipid concentration (µg lipid equivalent/g [or mL]) (males and females combined)						
	0.25 h	1 h	2 h	4 h	8 h	24 h	48 h
Lymph (mandibular)	0.064	0.189	0.290	0.408	0.534	0.554	0.727
Lymph node (mesenteric)	0.050	0.146	0.530	0.489	0.689	0.985	1.37
Muscle	0.021	0.061	0.084	0.103	0.096	0.095	0.192
Ovaries (females)	0.104	1.34	1.64	2.34	3.09	5.24	12.3
Pancreas	0.081	0.207	0.414	0.380	0.294	0.358	0.599
Pituitary gland	0.339	0.645	0.868	0.854	0.405	0.478	0.694
Prostate (males)	0.061	0.091	0.128	0.157	0.150	0.183	0.170
Salivary glands	0.084	0.193	0.255	0.220	0.135	0.170	0.264
Skin	0.013	0.208	0.159	0.145	0.119	0.157	0.253
Small intestine	0.030	0.221	0.476	0.879	1.28	1.30	1.47
Spinal cord	0.043	0.097	0.169	0.250	0.106	0.085	0.112
Spleen	0.334	2.47	7.73	10.3	22.1	20.1	23.4
Stomach	0.017	0.065	0.115	0.144	0.268	0.152	0.215
Testes (Males)	0.031	0.042	0.079	0.129	0.146	0.304	0.320
Thymus	0.088	0.243	0.340	0.335	0.196	0.207	0.331
Thyroid	0.155	0.536	0.842	0.851	0.544	0.578	1.00
Uterus (females)	0.043	0.203	0.305	0.140	0.287	0.289	0.456
Whole blood	1.97	4.37	5.40	3.05	1.31	0.909	0.420
Plasma	3.97	8.13	8.90	6.50	2.36	1.78	0.805
Blood: plasma ratio	0.815	0.515	0.550	0.510	0.555	0.530	0.540

Table 1 Mean (Sexes-Combined) Concentration of Total Radioactivity in Whole Blood, Plasma and Tissues Following Single Intramuscular Administration of [³H]-08-A01-C01 to Wistar Han Rats

Target Dose Level: 50 µg mRNA/Animal; 1.29 mg Total Lipid/Animal

Results expressed as total lipid concentration (µg lipid equiv/g (mL)) and % of administered dose

Sample	Total Lipid Concentration (µg lipid equiv/g (or mL))							% of Administered Dose						
	0.25 min	1 h	2 h	4 h	8 h	24 h	48 h	0.25 min	1 h	2 h	4 h	8 h	24 h	48 h
Small intestine	0.030	0.221	0.476	0.879	1.279	1.302	1.472	0.024	0.130	0.319	0.543	0.776	0.906	0.835
Spinal cord	0.043	0.097	0.169	0.250	0.106	0.085	0.112	0.001	0.002	0.002	0.003	0.001	0.001	0.001
Spleen	0.334	2.471	7.734	10.296	22.091	20.080	23.353	0.013	0.093	0.325	0.385	0.982	0.821	1.030
Stomach	0.017	0.065	0.115	0.144	0.268	0.152	0.215	0.006	0.019	0.034	0.030	0.040	0.037	0.039
Testes (males)	0.031	0.042	0.079	0.129	0.146	0.304	0.320	0.007	0.010	0.017	0.030	0.034	0.074	0.074
Thymus	0.088	0.243	0.340	0.335	0.196	0.207	0.331	0.004	0.007	0.010	0.012	0.008	0.007	0.008
Thyroid	0.155	0.536	0.842	0.851	0.544	0.578	1.000	0.000	0.001	0.001	0.001	0.001	0.001	0.001
Uterus (females)	0.043	0.203	0.305	0.140	0.287	0.289	0.456	0.002	0.011	0.015	0.008	0.016	0.018	0.022
Whole blood	1.970	4.369	5.401	3.049	1.314	0.909	0.420	-	-	-	-	-	-	-
Plasma	3.965	8.132	8.903	6.503	2.360	1.783	0.805	-	-	-	-	-	-	-
Blood:plasma ratio	0.815	0.515	0.550	0.510	0.555	0.530	0.540	-	-	-	-	-	-	-

- =Partial tissue taken therefore not applicable/not applicable

Exhibit 125 has tables of the Bio-distribution of the lipid nanoparticles, mRNA and spike proteins in the human body

In the first 15 minutes following injection of the Pfizer jab, researchers found that the total lipid concentration in the ovaries measured 0.104ml. This then increased to 1.34ml after 1 hour, 2.34ml after 4 hours, and then 12.3ml after 48 hours.

The scientists, however, did not conduct any further research on the accumulation after a period of 48 hours, so we simply don't know whether the concerning accumulation continued. The accumulation in the ovaries is very serious especially for women of child bearing age and the scientific and statistical findings in 2021 and 2022 confirm this. And the accumulation in the testes has very serious implications for men and young boys. The accumulation in most of the body's organs has serious consequences for men, women and children.

This same scientific paper was available to regulators in many countries worldwide, for example the Australian regulator called the 'TGA' has released this same document which was known to them since January 2021. They have a link to this at <https://www.tga.gov.au/sites/default/files/foi-2389-06.pdf> and **this is Exhibit 152 for the court**. A video lecture about this was provided by Dr. John Campbell in England at <https://www.youtube.com/watch?v=fVNFFtmb9gA>

A recent scientific study published in April 2023 and being peer reviewed in 2023 shows that the spike proteins gets distributed to most organs in the body. This confirms the findings above. I cite this scientific paper below:

SARS-CoV-2 Spike Protein Accumulation in the Skull-Meninges-Brain Axis: Potential Implications for Long-Term Neurological Complications in post-COVID-19

Rong et al. 2023

<https://www.biorxiv.org/content/10.1101/2023.04.04.535604v1>

Another scientific paper in 2023 found Circulating Spike Protein Detected in Post-COVID-19 mRNA Vaccine Myocarditis. This further confirms and validates the findings above. I cite the scientific paper below:

Circulating Spike Protein Detected in Post-COVID-19 mRNA Vaccine Myocarditis

Yonker et al. 2023

<https://pubmed.ncbi.nlm.nih.gov/36597886/>

This is extremely important as autopsy reports of dead covid19 vaccinated people have confirmed spike protein damage to organs and vessels in the body, and this is damaging and killing people. Dr. Arne Burkhardt, a top Pathologist, has made these findings in Germany. Scientific studies show accumulation, autoimmune reactions and inflammation in the heart, the brain and blood vessels. The risk of systemic autoimmune reactions over months possibly years is present. Spike proteins have been found circulating throughout the body in children and adults for months after vaccination. This is referenced in affidavits, exhibits, statement of truth and books of evidence filed in the court and in points below. A recent scientific paper published and being peer reviewed in 2023 shows that this is the case, I cite it below:

Autoimmune Inflammatory Reactions Triggered by the COVID-19 Genetic Vaccines in Terminally Differentiated Tissues

McCullough et al. 2023

<https://www.preprints.org/manuscript/202303.0140/v1>

A news report about this at

<https://www.conservativewoman.co.uk/vaccine-damage-is-now-indisputable-say-top-scientists/>

There was a US Congressional hearing about this in March 2023, which is in our Statement of Truth filed in the court in 2023. In support of this I further say that in its most recent Covid booster advice, the Australian Technical Advisory Group on Immunisation (ATAGI) finally acknowledged that for healthy young people, the risks may outweigh the benefit:

"Adolescents and younger adults have a lower age-related risk of severe COVID-19, and a comparatively

higher risk of myocarditis following vaccination.”

Source: <https://www.health.gov.au/news/atagi-2023-booster-advice#:~:text=Overview,aged%2065%20years%20and%20over>

news report at <https://rebekahbarnett.substack.com/p/high-risk-low-benefit-of-covid-boosters>

I further say that vaccine companies, including Pfizer rely on investors and investor's expectations and this itself is based on information, on the evidence and the facts. Seeking Alpha is one of the most successful investment advice services in the world, and they provide important information and data to investors, brokers, shareholders, business people and bankers in Wall Street in the USA, the City of London, Paris, Frankfurt, Tokyo, and other high profile financial market places. They have provided recent investment information about Pfizer in the context of their covid19 vaccines. Their information corroborates our points in this affidavit concerning the covid19 vaccines. I quote Seeking Alpha:

“This TGA report assesses Pfizer's (NYSE:PFE) pre-clinical data, and was available to regulatory authorities in January 2021, prior to the vaccine rollout. The ramifications of this data are only now becoming appreciated by the general public, since it contradicts data provided by the large-scale human trials. During the last quarterly conference call, Pfizer forecast continuing high earnings from its mRNA vaccine segment. As there is this new data in the public domain together with large price hikes planned, the ambitious revenue targets for the vaccine would appear to be unrealistic.

... on page 44 [of the TGA report] we can read that the lipid capsules that carry the components for the manufacture of the “spike” protein are widely distributed after injection. What this means is that these capsules can deliver the mRNA vaccine to virtually any cell in the body. Once a cell in the body begins manufacture of the spike protein, inflammation occurs, that is to say, the body releases chemicals that trigger an immune response. In medical terms, such an event is given the suffix “itis.” For example, the heart has a protective membrane around it called the pericardium. In pericarditis, the pericardium gets inflamed and is often caused by a viral infection. Now, if you take a look at Pfizer's data, you will find a considerable number of such “itis’.”

There is also conflicting information concerning efficacy. On page 4 ... This data infers that there was almost zero protection against SARS-CoV-2 infection provided by Pfizer's vaccine as compared to unvaccinated primates.

The above is not the only troubling data in the report, but the material above gives a flavour of the content therein.

If indeed the above were true, one would reasonably expect a large number of vaccinated individuals to become sick with some “itis” or other. And in fact, as described by Pfizer's own data, there is an extravagant collection of such issues. In my article, *‘HCA Healthcare: An Investment For Interesting*

Times', I speculate the interesting phenomenon of increasing poor health, by strange coincidence, from the commencement of mass vaccination for COVID.

I might also point out that, in my opinion, this increase in poor health may benefit Pfizer's other range of products in some areas of disease, the silver lining in the cloud for investors.

To Sum Up

It is entirely possible that Pfizer's targets for mRNA vaccine uptake will fail to materialise as the general populace consider the consequences to receiving an inoculation. However, there is always the possibility that governments may make a vaccination mandatory, despite the potential risks. Also, if one accepts Pfizer's assertion that sales of non-COVID related products will increase, by over 7%, PFE stock would be a hold rather than a sell, especially given the increase in illnesses."

Source: *Pfizer: Don't Bank On mRNA Vaccines*, Seeking Alpha, 1 April 2023

and <https://popularrationalism.substack.com/p/wall-street-wakes-up-pfizer-dont>

and <https://seekingalpha.com/article/4569880-hca-healthcare-an-investment-for-interesting-times>

Our affidavits and exhibits and statement of truth and books of evidence filed in the High Court show that this Bio-distribution of the lipid nanoparticles, mRNA and spike proteins in the human body has had serious consequences for men, women and children and also pregnant women and their unborn children.

This Non Disclosure of Biodistribution of lipid nanoparticles, mRNA and spike proteins to most organs in the human body and the accompanying risks to the health and lives of vaccinated people is serious and was known to Pfizer and Regulatory authorities in January 2021, and this has had serious implications for many people and it amounts to obtaining informed consent by non disclosure, false pretences, deception and fraud.

- **The consequences of the Biodistribution of lipid nanoparticles, mRNA and spike proteins to most organs in the human body were very serious - the Pathology evidence and Autopsy evidence. And there was Non Disclosure of this to the general public including those people who got the vaccines.**

Dr. Arne Burkhardt and his team of top Pathologists in Germany and Pathologists in Japan and other countries have found evidence that strongly suggests that the covid19 vaccines are distributing mRNA to most organs in the body and there is mass production of spike proteins in most organs of the body and also in the blood vessels and the immune system cells are attacking the spike proteins in the organs of the body, creating severe inflammation in the organs and in the blood vessels. It resembles autoimmunity where the immune system attacks the body's organs, tissues and/or blood vessels. This is leading to deaths, including sudden deaths. In Spring 2022, all Coroners and Pathologists around Ireland were given

information from Pathologists in Germany who discovered how the covid19 vaccines were killing people. But Irish pathologists and coroners have been blocked or banned from carrying out autopsies and post mortems on those people suspected of being killed by the vaccine. These autopsy methods have been developed by Dr. Arne Burkhardt and his team, some of the top Pathologists in Germany. These Pathology findings can be used in any country. I attach this Pathology documentation and information below

- Exhibit 7a for the court - German Pathology findings
- Germany Pathologist Findings at <https://pathologie-konferenz.de/en/>
- Dr. Arne Burkhardt's qualification, expertise, career and experience at <https://prabook.com/web/arne.burkhardt/42818>
- Dr. Arne Burkhardt - Pathology of vaccine deaths and vaccine injuries at https://odysee.com/@en:a5/Pathology-Conference_Burkhardt_Presentation_EN_20220311:7
- Dr. Arne Burkhardt - 2nd Conference on Vaccine Adverse Events Sept 18 2022 at <https://odysee.com/@LongXXvids:c/Prof-Arne-Burkhardt---2nd-Vax-Injury-Conference---Part-1:1?&sunset=lbrytv>

Here is the English language translation of Dr. Burkhardt's presentation at http://docs.shortxxvids.com/docs/Prof_Burkhardt_Nov2022_en_final.docx

- Dr. John Campbell analyses the Pathology findings of Dr. Arne Burkhardt at <https://www.youtube.com/watch?v=kEE5OfiVS7o>

These are all included in Exhibit 117 for the court

Japanese Pathology findings for a 14 year old girl killed by the covid19 vaccine at <https://www.sciencedirect.com/science/article/pii/S1344622323000548?via%3Dihub>

The title of this scientific paper is below:

This is a very important scientific study from Japan published in 2023 provides autopsy evidence that the covid19 vaccination caused multi organ inflammation and damage and sudden death in a 14 year old girl, shortly after she received the third covid19 vaccine. She had been healthy and fit prior to getting her covid19 vaccinations. The symptoms began after her first vaccination and worsened after each vaccination. The autopsy findings showed severe inflammation in her heart, lungs, liver, kidney, diaphragm, stomach, duodenum, and bladder, and the scientists provided photographic evidence of this. This correlates to other autopsy findings in Germany where there were similar findings in dead covid19 vaccinated people. We have cited them in prior affidavits and exhibits filed in the High Court.

The evidence strongly suggests that the covid19 vaccines are distributing mRNA to most organs in the body and there is mass production of spike proteins in most organs of the body and also in the blood vessels and there is strong scientific of this (see points below), and the immune system cells are attacking the spike proteins in the organs of the body, creating severe inflammation in the organs and in the blood vessels. It resembles autoimmunity where the immune system attacks the body's organs, tissues and/or blood vessels. We have provided evidence from Pfizer's own internal documents that the mRNA and spike proteins get distributed to all organs in the body to this court. This severe damage to the body's organs is progressive and would have killed the 14 year old child within one to two years. There were no infections found in the body and no past medical history of autoimmune disease or allergies. The cause of this sudden death was vaccine-related myopericarditis, which led to severe arrhythmias and progressive heart failure. This was related to the severe inflammation of the heart cited above.

These are all included in **Exhibit 117** for the court

A lecture about this important scientific paper was provided by Dr. John Campbell and this is also in **Exhibit 117 for the court.** A lecture about this important scientific paper and its findings was provided by Dr. John Campbell at <https://www.bitchute.com/video/4jbzFv9I54zX/>

- **There was Non Disclosure by the HPRA which is the Regulator in Ireland.** According to the HPRA's web site and recent advice in 2023, myocarditis and pericarditis can develop within just a few days after vaccination, with most cases occurring within 14 days. They occur more often after the second dose as compared to the first, and more often in younger males. Available data suggest that the course of myocarditis and pericarditis following vaccination is not different from myocarditis or pericarditis in general. For Comirnaty®, the risk of myocarditis and pericarditis appears to be lower in children (5 to 11

years) than adolescents (12 to 17 years). Myocarditis and pericarditis can develop within just a few days after vaccination, with most cases occurring within 14 days. They occur more often after the second dose as compared to the first, and more often in younger males. Available data suggest that the course of myocarditis and pericarditis following vaccination is not different from myocarditis or pericarditis in general.

This is on the HPRA web site in the year 2023 at [http://www.hpra.ie/docs/default-source/default-document-library/safety-update-covid-19-vaccines-overview-of-national-reporting-experience-\(17022023\).pdf](http://www.hpra.ie/docs/default-source/default-document-library/safety-update-covid-19-vaccines-overview-of-national-reporting-experience-(17022023).pdf)

THE HPRA SAY “APPEARS TO BE LOWER BUT DOES EXIST.” SO WHY DO IT? The scientific evidence shows that the covid19 infection is harmless to children, so why expose them to vaccines which give them myocarditis and pericarditis and a life time of heart problems or premature death ? its obvious that the profit interests of vaccine companies and their paid off cronies take precedence over the lives of Irish children.

This information was NOT printed in the vaccine promotion brochures and literature and the informed consent forms given to parents and guardians and children and indeed adults who got vaccinated over the last 2 years. Parents and guardians and children and also adults did not give their full informed consent for this. This is important in the context of the large increase in excess mortality in Ireland and other highly vaccinated countries which occurred shortly after mass covid19 vaccinations began.

- **I further say that the CDC in the USA released the following data for covid19 vaccines in January 2023 and that this corroborates our evidence and further supports our statements to the High Court and our case for an Injunction.**

The analyses cover VAERS reports for mRNA COVID-19 vaccines from the period from the vaccine rollout on Dec. 14, 2020, through to the end of July 2022.

- Centers for Disease Control and Prevention’s (CDC) Vaccine Adverse Event Reporting System (VAERS) safety signal analysis based on reports from Dec. 14, 2020 – July 29, 2022, for mRNA COVID-19 vaccines shows clear safety signals for death and a range of highly concerning thrombo-embolic, cardiac, neurological, hemorrhagic, hematological, immune-system and menstrual adverse events (AEs) among U.S. adults.
- There were 770 different types of adverse events that showed safety signals in ages 18+, of which more than 500 (or 2/3) had a larger safety signal than myocarditis/pericarditis.

- The CDC analysis shows that the number of serious adverse events reported in less than two years for mRNA COVID-19 vaccines is 5.5 times greater than all serious reports for vaccines given to adults in the U.S. since 2009 (~73,000 vs. ~13,000).
- Twice as many mRNA COVID-19 vaccine reports were classified as serious compared to all other vaccines given to adults (11% vs. 5.5%). This meets the CDC definition of a safety signal.
- There are 96 safety signals for 12-17 year-olds, which include: myocarditis, pericarditis, Bell's Palsy, genital ulcerations, high blood pressure and heart rate, menstrual irregularities, cardiac valve incompetencies, pulmonary embolism, cardiac arrhythmias, thromboses, pericardial and pleural effusion, appendicitis and perforated appendix, immune thrombocytopenia, chest pain, increased troponin levels, being in intensive care and having anticoagulant therapy.
- There are 66 safety signals for 5-11 year-olds, which include: myocarditis, pericarditis, ventricular dysfunction and cardiac valve incompetencies, pericardial and pleural effusion, chest pain, appendicitis and appendectomies, Kawasaki's disease, menstrual irregularities, vitiligo and vaccine breakthrough infection.

The safety signals cannot be dismissed as due to "stimulated," exaggerated, fraudulent or otherwise artificially inflated reporting, nor can they be dismissed due to the huge number of COVID-19 vaccines administered.

There are several reasons why, but the simplest one is this: the safety signal analysis does not depend on the number of reports, but whether or not some AEs are reported at a higher rate for these vaccines than for other non-COVID vaccines. Other reasons are discussed in the full post below.

- In August 2022, the CDC told The Epoch Times that the results of their safety signal analysis "were generally consistent with EB [Empirical Bayesian] data mining [conducted by the U.S. Food and Drug Administration (FDA)], revealing no additional unexpected safety signals."

So either the FDA's data mining was consistent with the CDC's method — meaning they "generally" found the same large number of highly alarming safety signals — or the signals they did find were expected. Or they were lying. We may never know because the FDA has refused to release their data mining results.

- For children the most common adverse events were

Adverse Event Safety Signals for 5-11 Year-olds:

- Myocarditis
- Pericarditis
- Ventricular dysfunction
- Cardiac valve incompetencies
- Pericardial & pleural effusion
- Chest pain
- Appendicitis & appendectomies
- Kawasaki's disease
- Menstrual irregularities
- Vaccine breakthrough infection
- Vitiligo

Adverse Event Safety Signals for 12-17 Year-olds:

- Myocarditis
- Pericarditis
- Bell's Palsy
- Genital ulcerations
- High blood pressure
- Tachycardia
- Menstrual irregularities
- Cardiac valve incompetencies
- Pulmonary embolism
- Cardiac arrhythmias
- Thromboses
- Pericardial and pleural effusion
- Appendicitis (and perforation)
- Immune thrombocytopenia
- Chest pain
- Intensive care
- Increased troponin levels
- Anticoagulant therapy

- Sources: https://www.theepochtimes.com/health/exclusive-cdc-finds-hundreds-of-safety-signals-for-pfizer-and-moderna-covid-19-vaccines_4956733.html

and

<https://childrenshealthdefense.org/defender/cdc-vaers-covid-vaccines-serious-injuries/>

This information was deliberately withheld and hidden from the general public, and was released only because of pressure from organizations to launch FOI requests for this data in the USA. And none of this data was communicated to the general public and to vaccine recipients and to parents and guardians prior to vaccinations. The same illness and disabilities are being caused to many people in the European Union but the EMA has refused to release this information to the general public.

This Non Disclosure of important evidence and facts, and the use of false pretences and deception to promote the vaccines as “safe” is deliberate fraud. There was no full and valid informed consent given for these vaccines.

- For these covid19 vaccines there were

- no toxicity studies
- no genotoxicity studies
- no reproductive toxicity studies
- no cardio toxicity studies
- no autoimmunity studies
- no juvenile paediatric studies
- no immuno toxicology studies
- no carcinogenic studies and no tumorigenicity studies

And there were no medium term and long term safety tests carried out on the covid19 vaccines and boosters. All government, health authority and regulator claims about the covid19 vaccines being “safe” were NOT backed up by scientific and medical evidence and were fraudulent. This involved both Non Disclosure to the public and the use of false pretences, deception and fraud to get informed consent by fraud.

- Many social groups and people with certain illnesses were excluded from the Pfizer vaccine trial, so the vaccine was never tested on them. A list of such groups and illnesses is available online at https://www.nejm.org/doi/suppl/10.1056/NEJMoa2110345/suppl_file/nejmoa2110345_protocol.pdf and **this is Exhibit 118 for the court**

Yet this same vaccine was given to these social groups and people with certain illnesses during mass vaccinations of the public. There was non disclosure of this to these social groups and people with certain illnesses and the general public. This means they were experimented on with untested vaccines for them which could worsen their health condition or illness. This amounted to fraud and has put lives at risk in Ireland and other countries.

- Non Disclosure of the dangerous ingredients in the vaccine. The Pfizer documents released under a US court order, mentioned in a section above, provide us with more information about the ingredients of the covid19 vaccines. Two of the lipids in Pfizer Covid-19 vaccines are ALC-0159 and ALC-315, as confirmed by an assessment report of the Pfizer Covid-19 vaccine published by the European Medicines Agency.

Source: https://www.ema.europa.eu/en/documents/assessment-report/comirnaty-epar-public-assessment-report_en.pdf

Both ALC-0159 and ALC-315 are classified by their manufacturers, Cayman Chemical, as being toxic and hazardous to humans. Yet these toxic and hazardous chemicals were in the Pfizer covid19 vaccines.

Sources: <https://cdn.caymanchem.com/cdn/insert/34336.pdf> and <https://cdn.caymanchem.com/cdn/insert/34337.pdf>

The Pfizer documents show that graphene oxide was used in the manufacturing of these vaccines, and is present within the vaccines.

Source: https://phmpt.org/wp-content/uploads/2023/02/125742_S1_M4_4.2.1-vr-vtr-10741.pdf, page 7

Scientific studies have found that graphene oxide is toxic to humans and can cause various illnesses in humans. It is implicated in illnesses of the nervous system and also in abnormal and excessive blood clotting which can cause several types of heart, circulatory and cardiovascular illnesses and premature deaths.

I cite an important published scientific study about this:

Toxicity of graphene-family nanoparticles: a general review of the origins and mechanisms

Ou et al. 2016

<https://particleandfibretoxicology.biomedcentral.com/articles/10.1186/s12989-016-0168-y>

This confirms what was stated in our affidavit filed in the court in December 2022 which detailed scientists, and scientific studies and research which found graphene in the covid19 vaccines. The findings above confirms what has been found by scientists in Spain in 2021 and 2022. Dr. Pablo Campra Madrid, a Professor of Chemical Sciences at Spain's University of Almería leads a team of scientists known as 'Quinta Columna'. Dr. Ricardo Delgado Martin is a member of this scientific research team, called 'Quinta Columna', who are mostly based in Seville in Spain. They have published several scientific reports about graphene in these vaccines and provided photographic and video evidence which are available online at <https://www.laquintacolumna.net/> and a recent scientific report is at www.data-analytica.org/Delgado.pdf.

Dr. Ricardo Delgado Martin made an official report about this to the European Parliament in January 2022 which is viewable at https://www.europarl.europa.eu/doceo/document/P-9-2022-000303_EN.html

Dr. Ricardo Delgado Martin gave a shocking and disturbing interview about the graphene found in these vaccines and the effects of graphene in the human body at <https://odysee.com/@StopTheCrime:d/Breaking-News-SHOCKING---Here-is-What-Really-is-in-the-Vaccines:d?src=embed>

These are included in Exhibits 114 for the court.

In addition to Non Disclosure of this to the general public, the Irish government and regulator and health authorities denied that graphene was in the vaccines.

This Non Disclosure of the toxic ingredients of the vaccine to the public has had and is having adverse consequences for the health of many millions of people in terms of new blood abnormalities, new

illnesses, disabilities and premature deaths, fuelling the rise in excess mortality and the rise in excess disability figures in highly vaccinated countries in 2022 and 2023.

- Non Disclosure of the defects, flaws and fraud in the Pfizer covid19 trials of 2020 which are itemised in affidavits filed in the court in December 2022 and January 2023 and the statement of truth filed in the court in 2023. And cited above in this document. Including the flaws and frauds in the covid19 vaccine trial identified by Brook Jackson which is before the federal courts in the USA. All Pfizer and government and regulator claims about vaccine safety and effectiveness are based on a trial which was defective, flawed and fraudulent. It is based on a fraud.
- Non Disclosure of the manufacturing defects in the Pfizer vaccine identified by Sasha Latypova itemised in affidavits filed in the court in December 2022 and January 2023 and the statement of truth filed in the court in 2023 and cited below in this document which render the vaccine defective, unsafe and ineffective.
- I say that on January 26th 2023, the Food and Drug Administration (FDA) is being sued by Children's Health Defense (CHD) for withholding the results of key COVID-19 vaccine safety analyses. This has implications for the EMA in Europe which follows the lead, the direction and decisions of the FDA, especially in relation to covid19 vaccines. The FDA's actions violate federal law, the new lawsuit, filed on Jan. 26 in federal court in Washington by the nonprofit Children's Health Defense (CHD), alleges. The suit is seeking the raw results from the FDA's analyses of reports to the Vaccine Adverse Event Reporting System (VAERS). The system, which the FDA runs with the U.S. Centers for Disease Control and Prevention, accepts reports of post-vaccination adverse events. As part of its vaccine safety monitoring, the FDA pledged to run a type of analyses called Empirical Bayesian (EB) data mining on the reports to see if any safety signals were triggered. Signals give agencies an idea of which problems may be caused by vaccines. Agencies are supposed to research signals to verify them or rule them unrelated to vaccination. Both the FDA and CDC have failed in their duty to do this and failed to provide the American public and the public around the world with this important information and data. This has placed the lives of many Americans in danger and the lives of many European and Irish people in danger.

This has serious implications for Ireland and Europe as the EMA in Europe follows the lead, the direction and decisions of the FDA and has access to the same data as the FDA and CDC in the USA. Thus the EMA is also criminally culpable in hiding this important data. The signals so far for the vaccines show increased risk of premature death, and serious illnesses and disabilities, many life long, and more hospitalizations. This has placed the lives of many Americans in danger and the lives of many European and Irish people in danger.

Courts including High Courts need to be mindful of the fact that those people supporting mass covid19 vaccinations and boosters are in fact supporting crimes, frauds and criminality, and that this needs to be ended through the adjudications and judgments of the courts.

- I further say that on the topic of “Information is Power”, it is equally true that concealment of information and Non Disclosure of information disempowers the people, and places their lives at serious risk of injury, illness, disability or death from vaccines. On this very point, an official EU Safety Report on the Pfizer mRNA vaccine reveals damning data and corroborates our evidence that the covid19 vaccines are not safe and have caused a high number of injuries, illnesses, disabilities and deaths. Many illnesses and disabilities caused by the covid19 vaccine were identified in the Pfizer trial and also in the post authorisation period. This EU Report was kept secret and hidden from the general public. It was only released via an FOIA request and then provided to the public by an anonymous person, being provided to the Austrian science and political blog, TKP.

The following is an overview of the total number of cases - post-marketing and clinical trial data - of the 6 month reporting period:

- 327,827 case reports (individuals) containing 1,172,887 events (adverse events)
- Three times more cases reported for women than for men
- Highest number of reported cases in the 31-50 age group
- A third of all case reports were classified as serious
- 44% of case reports were classified with outcomes as either unknown or unresolved
- 84% of case reports had no history of comorbidities
- 5115 deaths occurred after vaccine was administered
- 46% of fatal outcome cases occurred in those without any comorbidities

22 people under 17 died, and had no underlying illnesses. Out of 26 pregnancy cases in the trial, 15 ended in miscarriages and 5 resulted in live births with birth defects.

A link to this EU Safety report is provided below and the report and video testimony of the person who got the report are on a dvd marked **Exhibit 92 for the High Court.**

Link to Report: https://tkp.at/wp-content/uploads/2023/01/1.PSUR_organic.pdf

Sources: <https://soniaelijah.substack.com/p/eu-safety-report-on-pfizer-biontech>

News report: <https://childrenshealthdefense.eu/eu-issues/emas-failure-to-pull-covid-19-jabs-even-though-risk-benefit-balance-nullified/>

and <https://twitter.com/i/status/1627446876671811584>

This important information was hidden from the public and kept secret and NOT provided by the EU authorities, the EMA and the Irish government and health authorities to the general public and to people who got covid19 vaccinations. There was NO full and valid informed consent for these vaccinations.

- The CDC discovered as early as February 19, 2021, that mRNA vaccines were causing myocarditis in adolescent and young males, just 10 weeks after the rollout of the first vaccines. Yet they did not reveal this to the public until Dr. Tom Shimabukuro, made the tacit assertion over three months later on May 27, 2021, that there might be a connection between vaccines and myocarditis. In Europe, the EMA and HPRA denied there was a link until mid July 2021. This Non Disclosure was outrageous and placed millions of lives at risk.

Source: International Journal of Vaccine Theory, Practice, and Research,

<https://ijvtpr.com/index.php/IJVTPr/article/view/61>

and EMA <https://www.ema.europa.eu/en/medicines/dhpc/covid-19-mrna-vaccines-comirnaty-spikevax-risk-myocarditis-pericarditis>

- Non Disclosure of information in Pfizer documents leaked in March 2023 by Project Veritas showing the company had evidence that suggests patients who receive a COVID-19 vaccine are at an increased risk of myocarditis and pericarditis especially in young boys and males under 30.

Source: <https://www.projectveritas.com/news/breaking-confidential-pfizer-documents-reveal-pharmaceutical-giant-had/>

Although Pfizer couldn't identify a "clear mechanism" behind the increased risk in males, it did identify several possibilities. These included direct cardiotoxicity, acute/active viral infection, genetic predisposition and pre-existing conditions, a prior history of myocarditis, immune-mediated mechanisms and vaccine-associated autoimmunity, molecular mimicry to the spike protein and sex-related effects.

News report at <https://childrenshealthdefense.org/defender/myocarditis-pfizer-covid-vaccine/>

- Non Disclosure of the bad batches of covid19 vaccines which caused a higher rate of vaccine injuries, illnesses, disabilities and deaths as found and detailed on <https://www.howbadismybatch.com>

A new scientific paper in Denmark, found that 4.2 percent of Pfizer COVID-19 vaccine batches accounted for 71 percent of adverse events (SAEs), according to Danish researchers in a recent study published in the European Journal of Clinical Investigation on March 30, 2023. The study has raised more serious concerns about the inconsistencies in the quality of different vaccine batches and the implications for vaccine recipients. Bad vaccine batches and inconsistency in vaccine batches breaches European regulations and laws.

Batch-dependent safety of the BNT162b2 mRNA COVID-19 vaccine

Hansen et al. 2023

<https://onlinelibrary.wiley.com/doi/10.1111/eci.13998>

➤ **Pathology evidence and Autopsy evidence. And Non Disclosure of this to the general public including those people who got the vaccines.**

In Spring 2022, all Coroners and Pathologists around Ireland were given information from Pathologists in Germany who discovered how the covid19 vaccines were killing people. But Irish pathologists and coroners have been blocked or banned from carrying out autopsies and post mortems on those people suspected of being killed by the vaccine. These autopsy methods have been developed by Dr. Arne Burkhardt and his team, some of the top Pathologists in Germany. These Pathology findings can be used in any country. I attach this Pathology documentation and information below

- **Exhibit 7a** for the court - German Pathology findings

- Germany Pathologist Findings at <https://pathologie-konferenz.de/en/>

- Dr. John Campbell analyses the Pathology findings of Dr. Arne Burkhardt on **Exhibit 117** which is a dvd for the court. And also viewable at <https://www.youtube.com/watch?v=kEE5OfiVS7o>

Japanese Pathology findings for a 14 year old girl killed by the covid19 vaccine at

<https://www.sciencedirect.com/science/article/pii/S1344622323000548?via%3Dihub>

The title of this scientific paper is below:

A case of fatal multi-organ inflammation following COVID-19 vaccination

Nushida et al. 2023

<https://www.sciencedirect.com/science/article/pii/S1344622323000548?via%3Dihub>

This is a very important scientific study from Japan published in 2023 provides autopsy evidence that the covid19 vaccination caused multi organ inflammation and damage and sudden death in a 14 year old girl, shortly after she received the third covid19 vaccine. She had been healthy and fit prior to getting her covid19 vaccinations. The symptoms began after her first vaccination and worsened after each vaccination. The autopsy findings showed severe inflammation in her heart, lungs, liver, kidney, diaphragm, stomach, duodenum, and bladder, and the scientists provided photographic evidence of this. This correlates to other autopsy findings in Germany where there were similar findings in dead covid19 vaccinated people. We have cited them in prior affidavits and exhibits filed in the High Court.

The evidence strongly suggests that immune system cells were attacking the spike proteins in the organs of her body. We have provided evidence from Pfizer's own internal documents that the mRNA and spike proteins get distributed to all organs in the body to this court. This severe damage to the body's organs was progressive and would have killed the child within one to two years. There were no infections found

in the body and no past medical history of autoimmune disease or allergies. The cause of this sudden death was vaccine-related myopericarditis, which led to severe arrhythmias and progressive heart failure. This was related to the severe inflammation of the heart cited above.

A lecture about this important scientific paper was provided by Dr. John Campbell and this is **Exhibit 117 for the court**. A lecture about this important scientific paper and its findings was provided by Dr. John Campbell at <https://www.bitchute.com/video/4jbzFv9l54zX/>

- vaccine caused injuries, illnesses, disabilities and deaths in official foreign government body reports and statistics released under FOI requests or court orders
- In autopsies performed on dead covid19 vaccinated people showing that the vaccine or booster as the cause of death or the most likely cause of death. But not disclosed to the general public.
- In expert scientific reports signed by thousands of top scientists, medical doctors and medical professionals which we have provided in affidavits and exhibits to the court
- I say that the FDA in the USA and the EMA in Europe and the HPRA, NIAC and the Minister for Health in Ireland approved covid19 vaccinations for pregnant women when there were no scientific trials of the vaccine on pregnant women to establish if they were safe or not for pregnant women and their unborn children. This was criminal when one considers the massive damage done by these vaccines to pregnant women and their unborn children. Pfizer started a trial for pregnant women in Spring 2021 many months after covid19 vaccines were approved for all adults including pregnant women. As of February 2023, Pfizer have not released any data or the results of this trial. Two years have passed and no results have been given to the public. This non Disclosure appears to be a cover up. I cite news report about this below.

<https://maryannedemasi.substack.com/p/exclusive-whatever-happened-to-pfizers>

- The gain of function studies performed on the virus and the spike protein to make both more contagious and more deadly have been detailed in our affidavits, exhibits, statements of truth, and books of evidence filed in the High Court. The covid19 vaccine causes the human body to mass produce this gain of function spike protein. The gain of function spike protein was developed in a laboratory in China and the USA to be more contagious and deadly to humans. This is a public health threat to humans and the high number of vaccine injuries, illnesses and disabilities provide evidence of this. This was not disclosed to the general public. All the public was told was that the vaccine was “safe and effective”.
- As more and more people suffered injuries, serious illnesses and disabilities and deaths from the covid19 vaccines and boosters in Ireland from mid 2021 to the end of 2021 and for all of 2022 and into

2023, the Irish government and health authorities refused to report this to the general public. And they censored this news on RTE and in the press and media. And there is evidence that Coroners have been censored. These were despicable acts which placed the lives of many Irish people in danger and led to loss of lives and loss of health for many thousands of people. And now this places the lives of many Irish children in danger.

Many attempts were made by people around Ireland to warn the Irish government and health authorities about the dangers and risks of these covid19 vaccines in 2021, 2022 and 2023 but they were ignored, fobbed off, gaslighted and dismissed. In the case of medical doctors who tried to do this, they were shut up and silenced and censored by the Irish Medical Council on the directions of the Irish government and health authorities. The Irish Medical is controlled by the government. One medical doctor lost his licence and several other doctors received very threatening letters and were put under investigation. And the Irish government and health authorities had the data and access to the national and international databases showing that these vaccines were unsafe from January 2021 onwards and that fraud was involved in the vaccine trials and in the vaccine information given to the general public and in the promotion of the vaccines and in the cover up of vaccine injuries, illnesses, disabilities and deaths . Yet they persisted in this fraud and continued promoting the vaccines, advising people to get more covid19 vaccinations and boosters, even up to the present in 2023. They censored all those people including medical doctors who tried to warn the Irish people about the dangers and risk of these covid19 vaccines. They censored RTE and the press and media so as to hide and conceal all mention of covid19 vaccine injuries, illnesses, disabilities and deaths. There was also censorship on social media and the Internet, and this is being revealed in court cases worldwide and in US Congress investigations in 2022 and 2023.

The Coroners were blocked from reporting deaths caused by the covid19 vaccines. We provided evidence of this. The Irish government and health authorities dismissed, ignored and fobbed off the many thousands of people injured, made ill, disabled or killed by the covid19 vaccines and refused to give them a platform to speak or present their case in the press and media. The Irish government and health authorities knew about the high number of covid19 vaccine injuries, illnesses, disabilities and deaths in Ireland and many other countries but chose to ignore it and dismiss it, and do nothing about it, and censor it, and block, ban and de-platform anybody who publicly spoke up about this.

This proves 'intent', there was a clear intent to push only one narrative and to censor and block and ban all mention of covid19 vaccine injuries, illnesses, disabilities and deaths and the risks and dangers of this vaccine. There was clear intent to ignore all danger signals and all warnings and all risks associated with these vaccines and there was intent to deceive the general public and place the public in more and more danger. Intent has been proven by their actions from 2021 up to the present in 2023.

The large rise in excess mortality figures since mass covid19 vaccinations began in Ireland from mid 2021 onwards to the present in 2023 has mirrored what happened in other highly vaccinated countries during this time. And by contrast, lowly vaccinated countries had very small increases or zero increase or negative excess mortality figures during this time period. And this too is being ignored and dismissed by them. The intent to deceive, to lie, to mislead the general public has had dire consequences for the Irish people and nation. Conflicts of interest on the part of all the persons involved in promoting and pushing the covid19 vaccinations need to unravelled by this High Court and the other courts around Ireland in order to fully clarify the conflicts of interest involved and the financial intent of the parties involved in promoting and pushing the covid19 vaccinations. The financial intent explains the intent of those people involved. The courts must follow the conflicts of interest and follow the money. .

- From Spring 2022 onwards, many other countries have stopped recommending covid19 vaccines and boosters to under 40's and to children, including Britain, Sweden, Finland, Denmark, France, and others due to the injuries, illnesses, disabilities and deaths caused by these vaccines and boosters. This was known to the Irish government and health authorities in mid 2022 yet they persisted in vaccinations and not informing the general public about the risks and dangers and the actions of other governments.
- Another factor around informed consent involves the fact that those people who got the covid19 vaccinations were not told that the covid19 vaccine was unlicensed and experimental until mid 2023, and this means that full and valid informed consent was not given.
- In official figures worldwide showing higher All Cause Mortality for vaccinated adults and children
- In published peer reviewed scientific studies showing the ineffectiveness of the vaccine after 4 months due to antibody dependent enhancement or immune priming.
- NOT told about the superiority of natural immunity over covid19 vaccine induced immunity. Information provided by Pfizer to regulators worldwide including the EMA in Europe and HPRA in Ireland clearly showed that natural immunity was superior to vaccine induced immunity yet this information was not disclosed to the general public. This was known to regulators since January 2021 and was exposed recently on Page 9 of a report of the Regulator in Australia called the TGA. This report is on <https://www.tga.gov.au/sites/default/files/foi-2389-06.pdf> and is **Exhibit 152 for the court.**

Let me repeat this, natural immunity was found to be superior to vaccine induced immunity yet this information was not disclosed to the general public from January 2021 to the present.

- Not disclosing the infection fatality rate for covid19 for children and adults and different age groups. This would have revealed a risk for children which was less than that for colds and flus every year and a risk for adults equivalent to flu every year. This risk was reduced further by the Omicron variants. With the Omicron variants the risk of death is less than that of flus every year. This information was important for people making a decision whether to take the covid19 vaccine or not.

- The World Health Organization (WHO) in March 2023 announced that healthy children and teens should be considered low priority for COVID-19 vaccines and may not need the vaccinations. This confirms information we have given to the court since November 2022 showing the infection fatality rate for covid19 for children was less than that for colds and flus every year. There was no risk to children from the infection but the vaccines presented a high risk of injuries, illnesses, disabilities or death. This information was deliberately concealed and hidden from the Irish public by the government and health authorities.

Source: WHO, <https://www.who.int/news/item/28-03-2023-sage-updates-covid-19-vaccination-guidance>

news report: <https://childrenshealthdefense.org/defender/who-kids-teens-covid-shots/>

- Non Disclosure of the threat to pregnant women and their unborn babies as revealed in the Pfizer documents released under a federal court order in the USA in January 2022 and in scientific studies on this. This is in our affidavits, exhibits, books of evidence and statement of truth filed in the court.
- Not revealing that there were safe and effective medicines for treating and curing covid19 since May 2020. This information was important for people making a decision whether to take the covid19 vaccine or not.
- No Cost-Benefit analysis done in Ireland published and distributed to the general public. This was important for children, parents and the general public but was not done. This points to either incompetence or corruption or both.

We have a Cost - Benefit analysis for the covid19 vaccines based on official British government data and published scientific findings worldwide in our affidavit filed in January 2023 and a statement of truth filed in 2023. This is in **‘Exhibit 151 – Cost – Benefit analysis’** for the court. The EMA in Europe and HPRA failed to do a Cost-Benefit analysis and provide this to the public. The European Court of Justice has over the last 25 years demanded under the Precautionary Principle and Aarhus Convention that companies and governments and regulators carry out. The costs far outweigh the benefits. Cost-Benefit analysis should have been carried out by Irish government and health authorities, but was not carried out. Their claims of “safe and effective” are worthless and not credible.

- the dangers of the gain of function spike protein. Non disclosure and concealment of the gain of function studies performed on the spike protein in a lab and how this presents a danger to covid19 vaccinated people who mass produce this spike protein indefinitely in their own bodies. The legal and political debate over whether or not a gain of function virus and a gain of function spike protein constitutes a “Bioweapon” continues in the US Congress and US courts and also in other countries and

we will await their decisions on this matter before using the term “Bioweapon” in this High Court case. Though the Precautionary Principle which applies here and is often used in the Irish courts should apply here in this court case and in other court cases about this in Ireland.

- led to a massive rise in excess mortality in highly covid19 vaccinated countries. And the deliberate misconstruing, misinterpreting, and obfuscating of the reasons for the massive rise in excess mortality figures after mass covid19 vaccinations so as to mislead the general public and not warn them about the relationship between mass covid19 vaccinations and the large rise in excess mortality. Refusal to analyse the causality or causal relationship between mass covid19 vaccinations and the sudden large rise in excess mortality. And refusal to communicate this to the general public. Exhibit 150 provides strong evidence of this Causality using the Bradford Hill criteria.

The Irish government and health authorities did not reveal these facts to the Irish people and those people who got vaccinated. They parroted the words “safe and effective” for these vaccines continuously in the press and media and in medical leaflets but refused to tell the Irish public about the risks and dangers. This in itself was fraud and they used fraud and deception to get the informed consent of people for these vaccines in Ireland. This has had devastating consequences for many people around Ireland in terms of vaccine injuries, serious illnesses, disabilities and premature deaths.

This clearly shows the use of Non Disclosure, Deception and False Pretences. And also, they refused to update the general public about these higher risks and dangers as they became more widely known in late 2021 and into 2022 and 2023. This deprived people of fully informed decision making and full and valid informed consent. **This was the obtaining of informed consent by Non Disclosure, False Pretences, Deception and Fraud.**

This evidence was detailed in our affidavits, exhibits, statement of truth, and books of evidence filed in the High Court since November 2022 and in our Book of Authorities cited in court and filed in March 2023. I might add that these False Pretences misled many people in Ireland and have had devastating effects for many thousands of people around Ireland causing both physical health losses and financial losses. False Pretences is an important ingredient of fraud. The obtaining of informed consent by Non Disclosure, False Pretences, Deception and Fraud is Fraud according to the legal understanding of the term, and according to the Irish law, EU law and international law and court precedents in the superior courts in Ireland, Britain, European countries, North America, and other countries.

(iv) Fraudulent Business Model which causes serious illnesses and disabilities and premature deaths and this creates sales for more products and more profits into the future

Pfizer's internal covid19 vaccine documents released under a federal court order in the USA in 2022 show that the covid19 vaccines cause over 1,000 types of deadly illnesses, disabilities and premature deaths. It covers 9 pages and was presented to the High Court judge in our case on March 10th 2023. The Vigiaccess database of the WHO shows that the covid19 vaccine causes thousands of deadly illnesses, disabilities and premature deaths and is over 100 pages long. Our evidence in the affidavits, exhibits, statement of truth and books of evidence filed in the High Court confirm that this is happening worldwide. These deadly illnesses and disabilities caused by the covid19 vaccines have created new markets and profits for new medical drugs and vaccines to treat the illnesses and disabilities caused by the covid19 vaccines. This has created more profits and revenues for the vaccine companies and other Big Pharma companies. This amounts to a criminal racket to poison millions of people with covid19 vaccines and make them seriously ill, disabled and at significant risk of premature death and then sell them medical services and medicines and profit from this. This is a fraudulent and criminal business model.

This was recently pointed out in an investment report by a top Investment advice firm 'Seeking Alpha' . I quote them:

"I might also point out that, in my opinion, this increase in poor health may benefit Pfizer's other range of products in some areas of disease, the silver lining in the cloud for investors."

Source: *Pfizer: Don't Bank On mRNA Vaccines*, Seeking Alpha, 1 April 2023

and <https://popularrationalism.substack.com/p/wall-street-wakes-up-pfizer-dont>

and <https://seekingalpha.com/article/4569880-hca-healthcare-an-investment-for-interesting-times>

These investors state that they are expecting very high returns and profits from hospitals and from medical services and medical drugs in 2023 and for future years. How very interesting. It appears that poisoning many, many people and disabling many people with experimental vaccines is a very profitable business.

These mass covid19 vaccinations and boosting amounts to a criminal racket to poison millions of people with covid19 vaccines and make them seriously ill, disabled and at significant risk of premature death and then sell them medical services and medicines and profit from this. This is a fraudulent and criminal business model.

(v) in addition to Non Disclosure they deceived the general public about these vaccines and used False Pretences such as "safe and effective" and "stops transmission of the virus" and "stops spread of the virus" and "prevents infection". These statements have been proven to be false and are now widely accepted as being false. At the same time the government and health authorities were parroting the term "safe and effective" for these vaccines, they knew that the evidence showed that this was not the case.

The leaders of the EMA in Europe and the HPRA in Ireland and the Irish government and Health authorities stated that:

(i) covid19 vaccines were safe and effective

(ii) prevented transmission

(iii) they introduced vaccine passports on the grounds that covid19 vaccination prevented transmission of the virus. And they used these vaccine passports to discriminate against unvaccinated people in Ireland and other countries.

The scientific, medical and statistical evidence from around the world show these to be lies and a fraud. This fraud was exposed by Janine Small, the Pfizer executive in the European Parliament on October 11th 2022, where she stated that the covid19 vaccine had not been tested for stopping transmission. It was not proven to stop transmission. It did not stop transmission. Yet the Irish government and health authorities in Ireland and in other countries publicly claimed the covid19 vaccine stops transmission and they used this to promote the vaccine to the general public, and they implemented vaccine passports and discrimination and mandates in some places of employment to allegedly stop transmission of the virus. This was based on deception and fraud. This was detailed in our affidavit filed in the High Court in December 2022.

I present Exhibit 23 which is a screenshot of the HSE web site where they stated that the vaccine stops children spreading COVID-19 to others. The HSE implemented official Irish government policy and the policy of the Minister for Health, and distributed and administered covid19 vaccines, ran the vaccination centres, and injected the covid19 vaccines into people in Ireland. This lie about the covid19 vaccines stopping spread as seen on the HSE web site is proof that they gained and are gaining the informed consent of people by fraud and deception. And this lie was part of Irish government policy and the policy of the Minister for Health.

The net effect of this is fraud and obtaining the informed consent of people by fraud and deception.

The Chief Medical Officer in Ireland for 2021 and 2022 was Tony Holohan and he claimed in the press and media during this time that the covid19 vaccines stop transmission of the virus. This was a lie and a deception and it deceived the Irish public. This lie was repeated by the Minister for Health and the Taoiseach and by RTE and the Irish press and media. It was the main reason for the introduction of vaccine passports which were unlawful, unconstitutional and illegal and were based on a fraud and were themselves fraudulent. The covid19 has never been proven to stop transmission according to Pfizer after the trials in 2020 and other vaccine makers and according to the testimony of Janine Small a Pfizer executive who testified before the EU Parliament in 2022. Tony Holohan and the Irish government and health authorities engaged in lies and fraud to convince the Irish public to get the covid19 vaccine. This is

serious as Tony Holohan and these others was trusted and widely seen as a god or a hero or a messiah by most Irish people during this time. This fraud has had serious consequences for many Irish people today and into the future.

On a related point if the covid19 vaccines were truly “safe and effective” as claimed by Tony Holohan and the Minister for Health and the Taoiseach and by RTE, then why are Pfizer and other covid19 vaccine manufacturers indemnified and protected from being sued in the courts ? and why was this protection in the EMA contracts and Irish government contracts ? their public statements repeated many times of the covid19 vaccines being “safe and effective” should have meant that there was no need for indemnification and protection from being sued as the vaccines were supposed to be “safe”. This most clearly exposes the lie and the fraud.

To worsen this fraud, vital information about the covid19 vaccines is being deliberately concealed and hidden from the general public by government and health authorities, Christian Terhes an MEP from Romania in the European Parliament requested details of the Pfizer vaccine contract with the EU authorities and he was handed hundreds of pages of redacted and blacked out pages. So important information about the covid19 vaccine and the covid19 contracts with the EU are being deliberately concealed from MEPs and the general public. Christian Terhes, MEP has stated in the EU Parliament that the EU Commission contract with Covid vaccine makers is worth 71 billion euros and will supply 4.6 billion vaccines which is 10 vaccines for every person in the EU. Yet the details of these contracts are concealed from MEP's and members of the general public. The MEP's believe that Ursula Van Der Leyn, the President of the EU Commission, who negotiated the EU contracts with Pfizer has a conflict of interest as her husband is a top executive in a pharmaceutical company which is developing vaccine technologies and parts for Pfizer. Both Ursula Van Der Leyn and her husband stand to make massive financial gains, in the millions of euros, from these EU deals with Pfizer. Ursula Van Der Leyn has not publicly declared her interest and any conflicts of interest and she has refused to reveal the details of the EU deals which are on her mobile phones. This is now the subject of an investigation by the EU Prosecutor and court of auditors.

This deliberate and illegal concealment of important information about the covid19 vaccines has had the effect of reinforcing non disclosure and preventing informed decisions and blocking full and valid informed consent for this covid19 vaccine in the EU including in Ireland. They are obtaining informed consent by deliberate concealment, deception and fraud. This is made all the more serious when one considers the dangerous ingredients in the covid vaccines and the injuries, illnesses, disabilities and deaths caused by the covid19 vaccines and the large rise in excess mortality shortly after mass covid19 vaccinations in 2021 and 2022.

I enclose a video from the EU Parliament showing this which the judges here can view at their leisure - <https://rumble.com/v1nk7fg-in-covid-hearing-pfizer-director-admits-vaccine-was-never-tested-on-prevent.html>

This is 'Exhibit – Terhes' for the court

Pfizer vaccine Regulatory filings with Health Canada date-stamped April 2021 show Pfizer had strong evidence that its vaccine's efficacy waned and the vaccine was rapidly losing effectiveness. Pfizer did not release these results until the end of July 2021.

Sources: Health Canada filing at <https://clinical-information.canada.ca/ci-rc/item/252736> and Pfizer Press Release in April 2021 at <https://investors.pfizer.com/Investors/News/news-details/2021/Pfizer-and-BioNTech-Confirm-High-Efficacy-and-No-Serious-Safety-Concerns-Through-Up-to-Six-Months-Following-Second-Dose-in-Updated-Topline-Analysis-of-Landmark-COVID-19-Vaccine-Study-04-01-2021/default.aspx>

The intent to deceive is very clear from the evidence above and the fraud is obvious. The injured parties relied on these False Pretences and they made the decision to get vaccinated and boosted based on these False Pretences. Both the Intent to Deceive and False Pretences are important ingredients of fraud. And the reliance of the injured party on these False Pretences is another important ingredient of fraud.

(vi) The Irish government and health authorities claimed and still claim that the covid19 vaccines are “safe and effective” yet the medium term safety and long term safety of the vaccine was never established and unknown according to Pfizer and other vaccine companies and scientists and scientific studies, and the vaccine was in Phase 3 trial until mid 2023. It takes from 5 to 10 years to establish the safety and effectiveness of vaccines and other medical products. The covid19 vaccine trial lasted for about 6 months. This time period was far too short to assess and evaluate the safety of the vaccine. And in Points below we identify many defects, flaws and frauds in the Pfizer covid19 vaccine trial in 2020. No proper safety studies have been conducted to measure all cause mortality over the short, medium and long term for these covid19 vaccines. For these covid19 vaccines there were

- no toxicity studies
- no genotoxicity studies
- no reproductive toxicity studies
- no cardio toxicity studies
- no autoimmunity studies. This failure was significant as scientific studies are now showing the spike protein is leading to autoimmune reactions in many organs and all over the body.
- no juvenile paediatric studies

- no immuno toxicology studies
- no carcinogenic studies and no tumorigenicity studies

All government, health authority and regulator claims about the covid19 vaccines being “safe” were not backed up by scientific and medical evidence and were fraudulent. Yet this fraud and these false pretences were used to get informed consent from the public and those people who got the vaccinations and boosters.

The HSE provided false information about the covid19 vaccines to the public in a document titled

‘Covid-19 Vaccine - Important Information about the ComirnatyPfizerBioNTech vaccinefor children aged five to 11’ and viewable at

<https://www.hse.ie/eng/services/covid-19-resources-and-translations/covid-19-vaccine-materials/covid19-vaccine-easy-read-and-accessible-information/large-print-information-leaflet-for-parents-pfizer-vaccine-5-11s-v4.docx>

stating “The COVID-19 vaccine has gone through the same clinical trials and safety checks as all other licensed vaccines”

Studies of adverse effects in the short term from the covid19 vaccines show that the vaccines were unsafe and this has been documented in our affidavits filed in the High Court, our exhibits, and our books of evidence. In such circumstances, to claim that the covid19 vaccines were safe was a lie, a fraud and a deception. This is another ground for fraud. This led to the gaining of informed consent from people by non disclosure, false pretences, fraud and deception.

Many scientists and medical professionals and ourselves as Plaintiffs have identified many scientific flaws and defects in the Pfizer covid19 vaccine trial itself in **Point 8 in our December 2022 affidavit** filed in the High Court which render the trial itself and its findings defective, flawed and fraudulent, and render all claims about vaccine safety and effectiveness defective, flawed and fraudulent. Other flaws and defects and frauds in the Pfizer covid19 trial of 2020 were identified in the affidavits filed in the High Court since November 2022 and the statement of truth filed in 2023.

These important and material facts were NOT communicated by the Irish government and health authorities to the general public and to vaccine recipients in Ireland. This was deliberately concealed from the general public, while false allegations about vaccine safety and effectiveness were spread everywhere. The Irish government and health authorities have repeated these same false allegations in promoting Pfizer covid19 vaccines. This is of huge importance. I cite the legal principle which applies in this court case - ‘Falsus in uno, Falsus in omnibus’ which is a Latin and legal term meaning "false in one thing, false in everything." This means fraud and it also means that the scientific reports and studies and the affidavits of experts delivered by the defendants to us and to the High court rely on this fraud and cite

this fraud and are tainted by this fraud and are based on fraud and are inadmissible in this court and other courts. Courts and tribunals are not to be undermined and brought into disrepute by fraud. The net effect of this is fraud and obtaining the informed consent of people by fraud and deception.

We will present an army of covid19 vaccine injured to the High Court in this High Court case to give their testimony to the High Court. These people did not give their full and valid informed consent for these vaccines, as they were not told about the dangers and risks of these vaccines and the high number of vaccine injuries, illnesses, disabilities, and deaths. And they will state that all they told was that the vaccines were “safe and effective” by the Irish government and health authorities and by their parrots in the press and media. Now these vaccine injured people are suffering the consequences in terms of new illnesses and disabilities, loss of income and career, and the higher risk of premature death.

And we will present top scientists and medical doctors as expert witnesses for this High Court case who will confirm and verify the evidence we present to the court, and the harms caused by the covid19 vaccines and the fact that they are not safe and effective and the fact that full and valid informed consent was not given for these vaccines.

False Statements, false claims and the use of False Pretences and the reliance of others on this are vital ingredients of fraud.

(vii) Pfizer and the other vaccine companies and the Irish government and health authorities have constantly claimed that the covid19 vaccines were “safe and effective” in 2021 and 2022 and 2023 and if that was and is truly the case then they should have rejected, removed or lifted the indemnity for vaccine companies as the vaccines were supposed to be “safe”, very safe. This would mean that the vaccine companies can be sued in courts if their vaccines cause harm to people. The fact here is that the vaccine companies should have had no worries about removing the indemnity as they claimed the vaccines were safe and effective, but the facts show that they did have such worries because they knew the vaccines were unsafe. And the vaccine companies demanded the indemnity. This indemnity is part of the contract signed between Pfizer and the EU and between Pfizer and many other countries. This in itself proves the covid19 vaccines were unsafe, and exposes the vaccine companies including Pfizer and the Irish government and health authorities as liars.

The fact that the indemnity protects the vaccine companies, and Irish taxpayers are liable to pay for the injuries, illnesses, disabilities and deaths caused by the covid19 vaccines points to the fact that the Irish government and health authorities and vaccine companies already knew the covid19 vaccines were unsafe and are still unsafe. Their very actions speak for themselves and confirm that the vaccines are unsafe. The legal principle of **Res Ipsa loquitur** which is Latin: “*the thing speaks for itself*” applies here. This points to deliberate and calculated deception which is another ingredient of fraud.

(viii) persistence in this Deception and Fraud despite many warnings from members of the public about the dangers and risks to the general public. Persistence in an activity indicates Intent. In fact, persistence is one of the strongest indicators of Intent. Persistence which indicates Intent is another ingredient of fraud. This persistence allows a court to infer Intent in this case.

(ix) Fraudulent Misrepresentation and Breaches of Contract law

payment for these vaccines was made by the general public via taxpayer's money. All persons pay taxes whether directly from wages and salaries or indirectly through VAT and sales taxes and road taxes and property taxes, excises and custom duties and other forms of taxes. In this contract between Pfizer (and other vaccine companies) and the Irish taxpayers, the Irish taxpayer was deceived, misled, and defrauded in the contract for covid19 vaccines as they were told the vaccines were safe and effective, and stopped transmission of the virus, but they were not safe and effective and did not stop transmission of the virus, and there was fraudulent misrepresentation on the part of the vaccine companies. And the taxpayers were NOT told about the significant risk of injury, serious illnesses, disabilities and premature death from this vaccine and the loss of vaccine effectiveness after 4 months before buying the covid19 vaccines and boosters. This information above was material to the contract and vital to the contract and its deliberate omission means the contract was fraudulent. The taxpayers were the victims of fraudulent misrepresentation and fraud in this contract. This is breach of contract based on fraud. The government and health authorities signed a fraudulent contract with the vaccine companies using taxpayers money.

Then the government and health authorities committed more fraud by using False Pretences and fraudulent claims to authorise, market, promote and sell these vaccines and boosters to the public and obtain the informed consent of people by Non Disclosure, False Pretences, deception and fraud. People who got vaccinated or boosted entered a contract with the Irish government and health authorities and the people were led to believe the vaccines and boosters were safe and effective, but the evidence shows they were not. So we have two distinct frauds here, two fraudulent contracts. One affecting the taxpayer and the other one affecting the general public. One fraud leading to the other, in a domino effect.

The first injured party here are taxpayers who paid a lot of money in a fraudulent contract for a fraudulent and dangerous product, and the second injured party is the general public who are also taxpayers who have been duped by fraudulent claims, non disclosure, false pretences, deception and fraud to get these vaccinations and boosters and suffered loss, harm, injury and deaths as a result. These two distinct frauds, two fraudulent contracts, are important ingredients of fraud in this court case.

This fraud makes the vaccine contracts null and void and makes the indemnities null and void and makes those persons, companies, politicians, and state bodies who manufactured or sold, or marketed or promoted or injected these vaccines personally liable under the civil law and the criminal law.

(x) I further say that the Pfizer covid19 vaccines are in experimental stage until mid 2023. And the other covid19 vaccines of other companies are also in experimental stage until 2023. Thus they were and still are trials or more accurately experiments. Our books of evidence contain details of these trials and trial dates. Under EU laws, a Clinical Trials Register should have been set up in Ireland in January 2021. I further say that the Irish government and health and regulatory authorities failed to create a Clinical Trials Register in Ireland for these vaccine trials as required under EU Regulation (EU) No 536/2014 of 2014 and the Implementing Regulation (EU) 2017/556 of 24 March 2017 and the European Clinical Trials Directive 2001/20/EC of 2001. This Clinical Trials Register should contain the names and details of the persons participating in these covid19 vaccine trials, and monitoring reports for individuals, and detailed health status reports, including safety reports and adverse effects reports. And it should be made available to the general public, subject to GDPR protections. The Clinical Trials Register is described on the EU web site at <https://www.clinicaltrialsregister.eu/about.html> . The Irish government and health and regulatory authorities breached these EU laws.

As regards reporting, many medical doctors in Ireland did not report covid19 vaccine injuries, illnesses, disabilities or deaths out of fear of being labeled “anti vaccine” and being investigated by the Medical Council or being sued by the vaccine injured. Most of the Irish public do not know about vaccine injury reporting systems. There was no legal compulsion or mandate to report all covid19 vaccine injuries and deaths in Ireland. There was and still is no adequate reporting system. This was and is a further breach of EU laws.

I cite the relevant EU laws below and links to them:

Regulation (EU) No 536/2014 of the European Parliament and of the Council of 16 April 2014 on clinical trials on medicinal products for human use, and repealing Directive 2001/20/EC Text with EEA relevance <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32014R0536>

The Commission Delegated **Regulation (EU) 2017/1569** of 23 May 2017, supplementing Regulation (EU) No 536/2014 of the European Parliament and of the Council applies to all clinical trials authorised on the basis of the Clinical Trials Regulation. It specifies principles and guidelines for good manufacturing practice for investigational medicinal products for human use, and arrangements for inspections. Complementary to this, the detailed Commission guideline, adopted on 8 December 2017, on the good manufacturing practice for investigational medicinal products, pursuant to the second paragraph of the **Article 63(1) of Regulation (EU) No 536/2014** was adopted on 8 December 2017.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32017R1569>

European Clinical Trials Directive 2001/20/EC

If clinical trials are conducted outside the EU, but submitted for marketing authorisation in the EU, they have to follow similar principles to the provisions of the Clinical Trials Directive in Point 7 of this affidavit below I detail other serious breaches of these EU laws.

The failure to comply with these EU laws and the outright refusal to comply in Ireland is a serious breach of EU laws and is grounds alone for suspending or ending the covid19 vaccination programme in Ireland and other EU countries which have failed to comply with EU law. It is also grounds for civil cases and criminal cases in the Irish courts and European courts for those persons damaged by the breaches of these EU laws.

I further say that there have been breaches of Section 9, subsections 4 and 5 of the Control of Clinical Trials Act, 1987. The 6 days requirement was not met and was totally ignored and the people receiving the covid19 vaccines were not informed about the ongoing trial they were part of and not informed about the dangers and risks. In fact, the general public were not told that mass covid19 vaccinations was a large scale trial until mid 2023.

These breaches of Irish and EU laws amount to fraud and the obtaining of informed consent for vaccines by fraud.

(xi) facilitate this fraud by censoring the press and media and social media and the Internet. And the censoring and threatening of medical doctors and Coroners, and the censoring, blocking and banning of all persons who raised concerns about the risk and dangers of these vaccines. This is detailed in our statement of truth filed in the court in 2023 and our sworn affidavits and exhibits filed in the court since November 2022.

Covering up the fraud, concealing the fraud, and denying it is another vital ingredient of fraud.

(xii) knowledge of the dangers and risks involved in this mass covid19 vaccination and boosting and what was done to warn the general public brings us to the part of who knew what and when. By December 10th 2020 before mass covid19 vaccinations began these important and material facts were known to the vaccine manufacturers and to the FDA in the USA and to the EMA in the European Union and through the EMA to the regulatory authorities in Ireland. The vaccines could have been stopped then. By March 2021 the vaccine manufacturers and the FDA had data showing that the vaccines were harming, killing and disabling the general public and posed a major public health risk. They could have been stopped then. By May 2021, the CDC in the USA and the EMA in Europe and the HPRA in Ireland had safety signals showing that the vaccines were causing a high number of deaths, injuries and disabilities

and that these were increasing over time and they could have halted the vaccine as they had done with other vaccines in the past. They refused to do this.

By September 2021, the high number of deaths, injuries, illnesses, and disabilities caused by these vaccines were well known to the Irish government and to the Irish health authorities and to many governments worldwide. Yet they persisted in promoting vaccines and they introduced and enforced vaccine passports and discrimination and also coerced people working in the healthcare sector and other sectors into getting this vaccine. Important and material information was deliberately concealed and hidden from the general public and vaccine recipients while forms of coercion and manipulation were used to promote uptake of the vaccines. This was an outrageous abuse of and breach of the Constitutional rights and Natural Law rights and human rights of the Irish people, as it used coercion not free will and voluntary informed consent. It gained informed consent by a mixture of coercion and deception, including a vaccine passport which based on a fraud – that being that the vaccine stopped spread or transmission. The fact that these vaccines and vaccine passports led to injuries, serious illnesses, disabilities and deaths means that several criminal laws were broken by the Irish government and health authorities.

By Spring 2022, the Irish government and health authorities were well aware of the injuries, serious illnesses, disabilities and deaths caused by the covid19 vaccines and had been warned by members of the public, but they ignored and dismissed them and began authorising marketing and promoting boosters and injecting boosters into people which carried the same or a higher risk of harm and death as the original covid19 vaccines. The Intent here was and is very clear, that being to deliberately ignore and dismiss all risks and dangers associated with these vaccines and boosters and to continue the fraudulent claims and False Pretences, and place the Irish public in significant danger so as to profit the vaccine companies, and this is another important ingredient of Fraud.

1. **(xiii)** caused massive enrichment of the vaccine companies and their servants, lobbyists, political vassals, academic vassals, press and media vassals, and others who received financial inducements while causing massive losses to the many people injured, made seriously ill, disabled and killed by the vaccines and suffered substantial financial losses. The legal facts clearly show beneficiaries of fraud and injured parties from this fraud. The great efforts made by the Irish government and health authorities to ignore, dismiss, fob off, 'gaslight' or mock and neglect the thousands of people who were injured, made seriously ill, disabled or suffered premature death shows Malicious Intent to cover up this wrong or crime against the people and not accept liability for it.

A beneficiary of fraud and an injured party for this fraud is another ingredient of fraud. Intent including Malicious Intent is another vital ingredient of fraud.

(xiv) The need for the High Court to differentiate between Experts who have Conflicts of Interest and Experts who have no Conflicts of Interest and are Honest. Some Experts have been proven to be liars and have had Conflicts of Interest during the covid19 era of 2020 to 2023

I further say that some Experts have used untruths, lies and misinformation to obtain the informed consent of people for vaccines by non disclosure, false pretences, deception and fraud. The evidence shows that it is the “Experts” who lied, misled, deceived and peddled the covid19 lies and frauds for the last 3 years. This has been exposed in 2023 and I cite a newspaper article in the New York Post by a leading American medical doctor and surgeon, Dr. Marty Makary from Johns Hopkins University in the USA. He describes 10 lies or misinformation provided by the experts to the government and to the public in the USA and in other countries, including Ireland.

Misinformation #1: Natural immunity offers little protection compared to vaccinated immunity

Misinformation #2: Masks prevent COVID transmission

Misinformation #3: School closures reduce COVID transmission

Misinformation #4: Myocarditis from the vaccine is less common than from the infection

Misinformation #5: Young people benefit from a vaccine booster

Misinformation #6: Vaccine mandates increased vaccination rates

Misinformation #7: COVID originating from the Wuhan lab is a conspiracy theory

Misinformation #8: It was important to get the second vaccine dose three or four weeks after the first dose

Misinformation #9: Data on the bivalent vaccine is ‘crystal clear’

Misinformation #10: One in five people get long COVID

These lies and misinformation and frauds determined government policies, laws and regulations from 2020 to the present in 2023. And many “Experts” are continuing to engage in this.

Source: New York Post, February 27, 2023

<https://nypost.com/2023/02/27/10-myths-told-by-covid-experts-now-debunked/>

Emails released under the FOI law in the USA show that Tony Fauci and other government officials and top scientists believed that a lab leak was responsible for covid19 and that gain of function studies had taken place on the sars virus in the Wuhan lab. They decided to cover up the lab leak and deny it as the

NIH had funded these scientific studies in the Wuhan lab. They lied to the public and deceived the public.
news report: <https://childrenshealthdefense.org/defender/covid-lab-leak-theory-cover-up-collapse-cola/>
and https://www.youtube.com/watch?v=sD0i_YxPATc
emails: <https://usrtk.org/wp-content/uploads/2023/01/Request-20-320.pdf#page=792>

More lies, deception and cover ups about the origins of the sars-cov2 virus are provided in Point 123 below of this affidavit.

I further say that in addition to Non Disclosure and concealment of important information about these vaccines, that lies and liars have dominated the covid19 narrative and the promotion of covid19 vaccines in several countries. Lies from Tony Fauci of NIH, Rochelle Walensky of CDC, US President Joe Biden, the CEO's of Pfizer, Moderna, Jansen, and Astrazeneca, Bill Gates of the WHO, Tedross the head of the WHO, the leaders of the EMA in Europe and the Irish government and Health authorities stated that:

- (i) covid19 vaccines were safe and effective
- (ii) prevented transmission
- (iii) introduced vaccine passports on the grounds that covid19 vaccination prevented transmission of the virus. And used these vaccine passports to discriminate against the unvaccinated in Ireland and other countries.

The scientific, medical and statistical evidence from around the world show these to be lies and a fraud. And these liars are continuing to lie today and now some of them are denying what they said in the past. They realize they lied in the past and they are now trying to deny this or water it down or mitigate it. I provide one small sample below of the lies told by prominent people and these lies formed government policies and laws in Ireland and many other countries.



James Cintolo, RN FN CPT
@healthbyjames



"Vaccinated people do not carry the virus, and do not get sick."

- CDC Director Rochelle Walensky



6:21 PM · Jan 14, 2023 · 4.2M Views

8,079 Retweets 2,700 Quote Tweets 24.1K Likes

and this was reported in New York Times at <https://www.nytimes.com/2021/04/01/health/coronavirus-vaccine-walensky.html> and <https://nymag.com/intelligencer/2021/04/cdc-data-suggests-vaccinated-dont-carry-cant-spread-virus.html>

and in Fortune at <https://fortune.com/2021/04/01/its-official-vaccinated-people-dont-transmit-covid-19/>

But, several months later on live television Walensky claimed the covid19 vaccines do not prevent transmission and vaccinated people are getting infected with covid19 and the vaccines are proving to be ineffective

<https://twitter.com/i/status/1480295777213857799>

and <https://www.shtfplan.com/headline-news/cdc-director-what-vaccines-cant-do-anymore-is-prevent-transmission>

and <https://www.naturalnews.com/2022-09-16-walensky-cdc-spread-misinformation-covid-vaccine-safety.html>

A litany of lies <https://infonomena.substack.com/p/the-myocarditis-iceberg>

I further say that in addition to lies, there was use of deception and lies to promote excessive fear and panic among the general public to force them to accept lockdowns, masks and covid19 vaccines. The evidence and facts and all opposing views were dismissed and censored by those politicians intent on

pushing the fear and panic agenda on the public. This occurred in several countries including Ireland. The ex Minister for Health in Britain, Matt Hancock, has recently been publicly exposed as being a prime example of this. The whatsapp messages of Matt Hancock have been released for the public to view and they are shocking. I cite a link to news reports about this below

<https://www.google.com/search?q=matt+hancock+whatsapp+frighten>

The Lockdown Files at <https://www.telegraph.co.uk/news/lockdown-files/>

and news articles about this at <https://expose-news.com/2022/12/10/deluded-hancock-thinks-he-got-it-right/> and <https://www.spectator.co.uk/article/the-shabby-dishonesty-of-matt-hancocks-diaries/>

and <https://www.spectator.co.uk/article/the-truth-about-matt-hancock/>

and I include a message sent by Matt Hancock to others proving this.

Matt Hancock

We frighten the pants of everyone with the new strain

11:17



but the complication with that Brexit is taking the top line

11:17



Damon Poole

Yep that's what will get proper bahviour change

11:17

Matt Hancock

When do we deploy the new variant

11:35



25 January, 2021



Damon Poole | Department of Health Media Special Adviser
Have you spoken with tedros about nwap

13:21



Matt Hancock

yes

13:52



messed

13:52



Damon Poole

No promises but I'm trying to land a Bill gates endorsement of the platform

18:52

Matt Hancock

Tell him that considering how many people I'm getting his chips injected into, he owes me one!

18:53



Damon Poole

Haha

18:53

It should be pointed out to the court that Matt Hancock has not elucidated exactly what he meant by 'chips' being injected into people. The role of Tedross and Bill Gates in government decision making was very revealing as they are unelected and do not serve the people. They serve profit interests, Big Pharma interests, and Globalist interests.

I further say the government and health authorities in Ireland and several other countries forced the people to wear masks during the covid19 pandemic and used the police, courts, fines, and jail sentences to harshly enforce this on the general public. The scientific evidence, including RCT's, meta analysis, and Cochrane reviews, now prove that the masks they promoted did not work and do not work. The masks do not stop transmission of the virus and do not stop infection. The only masks which do work are those worn by scientists in level 3 to level 5 laboratories which are sealed off. These were not used by the general public during the covid19 pandemic. The purpose of masks and mask mandates and lockdowns was to create mass fear, paranoia, and panic and an artificial demand for covid19 vaccines. And this has been reinforced by the fact that effective medical drugs and early treatments for covid19 available since May 2020 were blocked and banned by government and health authorities. We have expert witnesses who will testify to this fact in the High Court.

I cite scientific studies about masks below.

Physical interventions to interrupt or reduce the spread of respiratory viruses

Jefferson et al. 2023

<https://pubmed.ncbi.nlm.nih.gov/36715243/>

Effectiveness of Adding a Mask Recommendation to Other Public Health Measures to Prevent SARS-CoV-2 Infection in Danish Mask Wearers : A Randomized Controlled Trial

Bundgaard et al. 2021

<https://pubmed.ncbi.nlm.nih.gov/33205991/>

Nonpharmaceutical Measures for Pandemic Influenza in Nonhealthcare Settings—Personal Protective and Environmental Measures

Xiao et al. 2020

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7181938/>

The evidence showing the failures of lockdowns, social distancing, masks and vaccines from 2020 to 2022 are provided in our books of evidence, numbers 1 to 15

Top scientists and medical doctors have issued a report detailing the failures of lockdowns, social distancing, masks and vaccines and they have called for a public inquiry or commission into these failures.

The title of this Report is **QUESTIONS FOR A COVID-19 COMMISSION**

and this is **Exhibit 73** for the High Court

<https://dailysceptic.org/wp-content/uploads/2023/02/QUESTIONS-FOR-A-COVID-19-COMMISSION-by-the-Norfolk-Group.pdf> or <https://dailysceptic.org/2023/02/07/martin-kulldorff-jay-bhattacharya-and-colleagues-demand-a-full-inquiry-into-americas-disastrous-covid-response/>

or <https://www.data-analytica.org/questions.pdf>

Dr. Jay Bhattacharya, a Professor of Medicine at Stanford University in the USA said that there was no scientific consensus about lockdowns, masks, school closures, covid19 vaccines, mandates and passports, and he said "What happened was a relatively small group, a cartel almost, of very powerful scientific bureaucrats took over the whole apparatus of science — at least as far as the public eye is concerned — dominated the media, dominated the message to politicians, and as a result, we had a catastrophic response to COVID. And we're going to be paying the costs of that for a very long time."

Source: <https://twitter.com/i/status/163218327778763779>

Peter Daszak a central figure in the covid19 pandemic and the Wuhan laboratory and gain of function studies stated the following prior to the covid19 pandemic, which explains why this was done and sums it all up:

"We need to increase public understanding of the need for medical countermeasures such as a pan-coronavirus vaccine. A key driver is the media and the economics will follow the hype. We need to use that hype to our advantage, to get to the real issues. Investors will respond if they see profit at the end of the process."

The evidence shows that the selling of covid19 vaccines and the making of massive profits and financial gains including commissions, undeclared payments, inducements, grants, investments, etc. and massive transfers of wealth from this was the objective of all of these measures above - masks, lockdowns, social distancing, business closures, mandates, passports, etc., and this was reinforced by the fact that vaccine injuries, illnesses, disabilities and premature deaths and the excess deaths they caused have been and are being completely ignored by government and health authorities. And effective medical drugs for treating covid19 since May 2020 were blocked, censored, and banned. This explains the motives behind those people in government and health authorities who brought in these harsh measures and laws and also deprived people of full and valid informed consent for these covid19 vaccines.

I further say in addition and in furtherance of and in support of Point 74 in the previous affidavit filed in January 2023 that Bill Gates one of the most vocal supporters of the covid19 lockdowns and later of the covid19 vaccines and boosters and the second biggest funder of the WHO and who has power and control over the WHO which itself has a lot of power over governments worldwide , and is a man of considerable political power and economic power globally, has changed his mind about covid19 vaccines after he made massive profits from the vaccines and boosters. He now claims they lack effectiveness and durability which contradicts what he said since 2021, but corroborates what is in this affidavit and previous affidavits and our books of evidence. He and others have made vast profits from these experimental covid19 vaccines while many vaccinated people worldwide, including in Ireland must endure premature deaths or loss of loved ones, serious injuries, illnesses and disabilities from these vaccines and big rises in excess mortality.

The **Conflict of Interest** here is very obvious. Bill Gates used the WHO and its power over governments worldwide, including the Irish government and health authorities, and used many other organizations, including Universities and academics and the press and media, to push for hard lockdowns, masks, school closures, etc. with the final objective of selling covid19 vaccines and boosters and making massive profits. And of course, ignoring, fobbing off, and denying the high number of injuries, illnesses, disabilities and deaths caused by these vaccines and boosters to many millions of people around the world, including in Ireland. Also, the destruction of many small and medium sized businesses during lockdowns greatly increased the sales, profits and market share of big globalist corporations who were allowed to remain open and conducted a lot of business online. Bill Gates and his supporters have shares and financial interests in these big globalist corporations.

The plan was quite simple:

- Lock down every state and every country

- Ban and block safe and effective medicines and treatments for covid19 since May 2020. Create an artificial demand for experimental covid19 vaccines
- Develop and sell the COVID19 vaccines and make them mandatory in many workplaces and through use of vaccine passports in society
- Shut down and censor all opposition and medical doctors and scientists who object or question the agenda
- Only after the vaccine is given can people get back to work and the lockdowns and other restrictions end

Igor Chudov did a brilliant analysis of the facts and evidence, drawing in Event 201, the role of the WEF and the WHO and other globalist organizations and their power over national governments and the press and media in this at <https://igorchudov.substack.com/p/creepy-conspiratorial-globalists>

A news report about this at <https://childrenshealthdefense.org/defender/bill-gates-profits-biontech-effectiveness-covid-vaccines/>

The following tweet from Robert Kennedy of the well known Irish-American political dynasty in the USA describes this situation quite well and succinctly.



Robert F. Kennedy Jr. 
@RobertKennedyJr

...

Bill Gates just admitted mRNA jabs don't stop infection, don't block transmission, don't block mutants, don't last, don't work at all — after he sold stock in his vaccine ventures 😂😂😂. Thanks, Suckers!



childrenshealthdefense.org

Bill Gates — After Reaping Huge Profits Selling BioNTech Shares — Trashes Effe...

Bill Gates, long recognized as one of the world's foremost proponents of vaccines, raised some eyebrows at a recent talk in Australia when he admitted ...

8:32 PM · Jan 27, 2023 · **3.5M** Views

Source: <https://twitter.com/RobertKennedyJr/status/1619070787994140673?>

Peter Daszak a central figure in the covid19 scandal and the Wuhan laboratory and gain of function studies

echoed Bill Gates and this profit driven agenda above when he stated the following prior to the covid19 pandemic, which sums it all up:

"We need to increase public understanding of the need for medical countermeasures such as a pan-coronavirus vaccine. A key driver is the media and the economics will follow the hype. We need to use that hype to our advantage, to get to the real issues. Investors will respond if they see profit at the end of the process."

These conflicts of interest are widely believed to have played a role in this fraud. Government advisors, members of advisory bodies, NPHET, CMO, NIAC, HPRA, the Medical Council and academics, senior civil servants have all benefitted from Big Pharma funding and grants and investments and other forms of funding from them in the past and present. Many had investments in vaccine companies and Big Pharma. They had a vested interest in promoting the covid19 vaccines and boosters regardless of the risks and dangers to the general public. Massive profits and financial gains were made and this is continuing into the future. Conflicts of interest on the part of all the persons involved in promoting and pushing the covid19 vaccinations need to unravelled by this High Court and the other courts around Ireland in order to fully clarify the conflicts of interest involved and the Financial Intent of the parties involved in promoting and pushing the covid19 vaccinations. The courts must follow the Conflicts of Interest and follow the money in this case. This will involve organisations such as the Criminal Assets Bureau and their foreign counterparts and examination of accounts both onshore and offshore. This will be important in terms of Restitution and Compensation for the injured parties. The Financial Intent explains the Intent of those people involved and their persistence in this fraud mentioned in a point above. The Financial Intent which underlies Intent is another important ingredient of Fraud.

The truth behind covid19 and the lockdowns and other restrictions and the covid19 vaccines and the vaccine passports and mandates, and the cover ups of many injuries, illnesses, disabilities and deaths caused by these vaccines and will be caused for many years into the future can only be attained by following the money and the conflicts of interest of those in government and health authorities and their "advisors" and the big global corporations and lobbyists who lobby and contract with these governments, and those who control the WHO all of whom orchestrated this highly profitable venture.

(xv) No Vaccine Injury Compensation program for those people injured, made ill, disabled or killed by the vaccine fraud in Ireland

Those people injured, made seriously ill or disabled or killed by the covid19 vaccines were duped by fraudulent claims about the covid19 vaccine. They relied on the fraudulent claims and the False Pretences and legally should not have to bear financial responsibility for the consequences of the fraud, wrong doing and crimes committed by others against them. The courts here in Ireland and abroad have in the past

demanding that those people or entities guilty of committing fraud must be made to pay restitution to and compensate the injured party, which in this case are the vaccine injured, ill, disabled, and the dead or close relatives of the dead.

However, the Irish government and health authorities have ignored the massive losses imposed by their fraud on the injured parties. These losses include physical health losses, loss of life, job/ career losses, and financial losses. From a legal and Constitutional perspective this involves the loss of bodily integrity and loss of the right to life, and loss of a right to work and earn a living for many thousands of people who were injured, made ill, disabled and who died from these vaccines. No Vaccine Compensation program was put in place in 2021 and 2022. The people who are vaccine injured face financial hardships, poverty, and bankruptcy trying to pay for doctors, expensive diagnostic tests, expensive medical treatments, alternative treatments, hospital stays, etc. to recover from the injuries, illnesses, and disabilities caused by these vaccines. Most of these people cannot afford the legal fees to fight for justice and compensation in the High Court and Supreme Court. Massive losses have been imposed on the people of Ireland. Losses, including massive losses in this case, is another vital ingredient of fraud. And the guilty party ignoring, dismissing and denying the losses and damage they caused to the injured party is another ingredient of fraud.

Other countries have vaccine injury compensation programmes but NOT Ireland. In Britain they have had to increase staff by twenty times to cope with the vast amount of covid19 vaccine injuries, illnesses and disabilities in 2022 and 2023. I cite a news report from The Telegraph newspaper in Britain

<https://www.telegraph.co.uk/news/2023/03/24/vaccine-damage-payment-scheme-boosts-staff-numbers-four-80-covid/>

The same is happening in other countries.

Adults and children who were injured or made ill or disabled or died from these covid19 vaccines have to go to the High court and/or Supreme court to get justice and compensation and this can cost up to 100,000 euros and more and this cost can be increased to over 200,000 euros if they lose the case and have to pay the Costs of the other side. The state, representing the vaccines and vaccine makers, hire the best lawyers and barristers in the country and hire the top doctors, hospital consultants and scientists as expert witnesses to attack and destroy the people who are vaccine injured in court. They have no realistic chance of winning such court cases and this is widely known. And, Individuals and families face the threat of losing their homes in such court cases. This is far too expensive and burdensome and acts to deprive ordinary people of justice under law, and this breaches the Irish Constitution, the EU Charter of Fundamental Rights and EU Human Rights law and UN Human Rights law. This system is completely unfair and is illegal, unlawful and breaches the Irish constitution and national and international laws. But more

importantly this defective system supports the Fraudsters who can defraud an entire population, the taxpayers of Ireland and expect to get away with it due to the high legal costs of trying to get justice in the courts in Ireland. If a fraudster calculates that he or she can get away with fraud, then this will give them the motivation and the Intent to commit fraud, and this itself is another ingredient of fraud.

This amounts to mass theft and larceny from the vaccine injured who were duped by non disclosure, false pretences, deception and fraud into getting covid19 vaccinations which were unsafe and have inflicted massive financial losses and health losses on them and loss of life in some cases.

(xvi) Falsus in Uno, Falsus in Omnibus (Latin legal term meaning false in one thing, false in all things)

The track record of Pfizer and other vaccine companies in relation to their use of false claims, false pretences and fraud and damage and losses caused to injured parties in the past was itemised in affidavits filed in December 2022 and January 2023 in the High Court. They have been found guilty of fraud and bribery and corruption and other serious offences several times in courts over the past 30 years and have had to pay fines of billions of euros. This is a legal fact. In these past cases they used the term “safe and effective” to describe and market and sell their medical products. The courts found that they were not safe and effective. Today we are faced with a similar situation, but on this occasion the machinery of government and the state are being used to promote the “safe and effective” message and the fraud associated with that. This track record in fraud and fines totalling billions of euros is another indicator of fraud in this case. I cite the legal term **Falsus in Uno, Falsus in Omnibus**, which is Latin and means false in one thing, false in all things, which is often quoted in these type of cases in the superior courts in Ireland, Britain, and North America.

The Role of Persistence in the Revealing of Intent

Many attempts were made by people around Ireland to warn the Irish government and health authorities about the dangers and risks of these covid19 vaccines in 2021, 2022 and 2023 but they were ignored, fobbed off, gaslighted and dismissed. In the case of medical doctors who tried to do this, they were shut up and silenced and censored by the Irish Medical Council on the directions of the Irish government and health authorities. The Irish Medical is controlled by the government. One medical doctor lost his licence and several other doctors received very threatening letters and were put under investigation. And the Irish government and health authorities had the data and access to the national and international databases showing that these vaccines were unsafe from January 2021 onwards and that fraud was involved in the vaccine trials and in the vaccine information given to the general public and in the promotion of the vaccines and in the cover up of vaccine injuries, illnesses, disabilities and deaths . Yet

they persisted in this fraud and continued promoting the vaccines, advising people to get more covid19 vaccinations and boosters, even up to the present in 2023. They censored all those people including medical doctors who tried to warn the Irish people about the dangers and risk of these covid19 vaccines. They censored RTE and the press and media so as to hide and conceal all mention of covid19 vaccine injuries, illnesses, disabilities and deaths. There was also censorship on social media and the Internet, and this is being revealed in court cases worldwide and in US Congress investigations in 2022 and 2023.

The Coroners were blocked from reporting deaths caused by the covid19 vaccines. We provided evidence of this. The Irish government and health authorities dismissed, ignored and fobbed off the many thousands of people injured, made ill, disabled or killed by the covid19 vaccines and refused to give them a platform to speak or present their case in the press and media. The Irish government and health authorities knew about the high number of covid19 vaccine injuries, illnesses, disabilities and deaths in Ireland and many other countries but chose to ignore it and dismiss it, and do nothing about it, and censor it, and block, ban and de-platform anybody who publicly spoke up about this.

This proves 'intent', there was a clear intent to push only one narrative and to censor and block and ban all mention of covid19 vaccine injuries, illnesses, disabilities and deaths and the risks and dangers of this vaccine. There was clear intent to ignore all danger signals and all warnings and all risks associated with these vaccines and there was intent to deceive the general public and place the public in more and more danger. Intent has been proven by their actions from 2021 up to the present in 2023.

This Intent and the actions of this Intent has led to serious consequences and losses for many people. The large rise in excess mortality figures since mass covid19 vaccinations began in Ireland from mid 2021 onwards to the present in 2023 has mirrored what happened in other highly vaccinated countries during this time. And by contrast, lowly vaccinated countries had very small increases or zero increase or negative excess mortality figures during this time period. And this too is being ignored and dismissed by them. The intent to deceive, to lie, to mislead the general public has had dire consequences for the Irish people and nation. Conflicts of interest on the part of all the persons involved in promoting and pushing the covid19 vaccinations need to unravelled by this High Court and the other courts around Ireland in order to fully clarify the conflicts of interest involved and the financial intent of the parties involved in promoting and pushing the covid19 vaccinations. The financial intent explains the intent of those people involved. The courts must follow the conflicts of interest and follow the money.

Their deliberate attempt to conceal the facts, the evidence and the fraud, and then to censor them by several methods points to the fact they knew that they were engaged in illegal and unlawful activity which was harmful to the people of Ireland and causing great physical losses and financial losses for the injured parties, and they tried to escape both criminal liability and civil liability for this by censoring and

hiding the evidence. This enabled them to persist in their activities and they persisted in this. Their persistence shows their real Intent and proves Intent. They have shown everybody what their true Intent was and still is.

Their Intent is revealed through their actions numbered **(i) to (xvi)** above, and also in their persistence in these actions despite many warnings from members of the public and from safety signals worldwide. Persistence is a very strong indicator of Intent. They persisted and persisted in their activity. Their intent clearly shows their grim determination to push an agenda based on Deception and Fraud. The legal test for 'Mens Rea' is satisfied here, as the Intent is clearly shown. I cite the US Supreme Court in its ruling on 'Mens Rea' or Intent in *Rehaif v. United States*

"As this Court has explained, the understanding that an injury is criminal only if inflicted knowingly 'is as universal and persistent in mature systems of law as belief in freedom of the human will and a consequent ability and duty of the normal individual to choose between good and evil.'"

Rehaif v. United States, 139 S. Ct. 2191, 2196 (2019) (citing *Morrisette*, 342 U.S. at 250).

In the Irish Supreme Court precedent set in *Melling v. O Mathghamhna* it was stated that: "where mens rea is made an element of an offence it is generally an indication of criminality." The requirement of mens rea, for the act must be done knowingly.

The Irish Supreme Court held, in *The People (DPP) v Power* (2008), that where a criminal offence was created by statute, and the statute was silent as to mens rea, there was a presumption that mens rea was required in relation to the offence as a whole and in relation to each constituent part of the offence. Causing vaccine injuries, illnesses, disabilities and deaths to many thousands of people in Ireland and refusing to do anything to stop this or mitigate it is a criminal offence and also a civil offence.

In the superior courts in Britain, judgments concerning "Mens rea" have made use of section 8 Criminal Justice Act 1967 which provides a statutory framework within which *mens rea* is assessed and measured. It states:

A court or jury, in determining whether a person has committed an offence,

- (a) shall not be bound in law to infer that he intended or foresaw a result of his actions by reasons only of its being a natural and probable consequence of those actions; but
- (b) shall decide whether he did intend or foresee that result by reference to all the evidence, drawing such inferences from the evidence as appear proper in the circumstances.

Under s. 8(b), therefore, the jury is allowed some latitude in applying a hybrid test to impute intention or foresight (for the purposes of recklessness) on the basis of all the evidence. The EMA in Europe and the

Irish regulator and Irish government and health authorities had a massive amount of evidence showing serious illnesses, disabilities and deaths caused by the covid19 vaccine but chose not to act to protect the general public, and persisted in promoting these vaccines at the expense of causing more injuries, more illnesses, disabilities and deaths to the general public. This was gross or extreme recklessness on the part of the EMA in Europe and the Irish regulator and Irish government and health authorities.

An important court precedent involving "Mens rea" from Britain is R v. Majewski [1977], argued in the House of Lords, where the learned judges stated the following 'The state of mind stigmatised as wrongful by the criminal law which, when compounded with the relevant prohibited conduct, constitutes a particular offence.' In this case, the excuse of Recklessness was no defence in court and it proved basic intent could convict in addition to the well established specific intent.

The legal principle of **Res Ipsa loquitur** which is Latin: "*the thing speaks for itself*" applies here. We have all observed the non disclosure, the deception and frauds in the promotion of these covid19 vaccines and the terrible consequences in terms of record numbers of vaccine injuries, illnesses, disabilities and deaths, and the large rise in excess mortality shortly after mass vaccinations, especially in highly vaccinated countries. This legal principle of **Res Ipsa loquitur** has been upheld by the Supreme Court and High Court in Ireland since the foundation of the Irish State. The most recent application of this legal principle was in the Irish Supreme Court in Doherty v Reynolds and St. James's Hospital Board [2004], where the legal principle of **Res ipsa loquitur** was applied in the judgment of the Supreme Court in circumstances very similar to the one being presented here in the High Court. The Supreme Court found that the only reasonable and logical explanation in the circumstances was medical negligence and the injured party was entitled to compensation. The same principle applies to those many people injured, made seriously ill or disabled or killed shortly after receiving the covid19 vaccinations or boosters and the reasonable and logical explanation in the circumstances was Intent to gain informed consent by Non Disclosure, False Pretences Deception and Fraud for financial gain and other pecuniary advantages.

A similar precedent set by Judge Walsh in the People vs Thompson (1960) in the Court of Criminal Appeal where the learned judge stated Intent can be inferred from the facts of the case is very relevant to our case. Intent in our case can indeed be inferred from the facts of the case and from points (i) to (xiii) above. The legal facts clearly show beneficiaries of fraud and injured parties from this fraud in our case, and this is a vital ingredient of fraud. The great efforts made by the beneficiaries of this fraud, in this case the covid19 vaccine companies and the Irish government and health authorities to ignore, dismiss, fob off, 'gaslight' or mock and neglect the thousands of people who were injured, made seriously ill, disabled or suffered premature death shows Malicious Intent to cover up this wrong or crime against the Irish people and not accept liability for it. Malicious Intent is another ingredient of Fraud, especially in respect

of trying to conceal or cover up the crime including the injury done to others.

More Relevant Court Precedents in this court case

This is similar to other frauds committed in the past. Court precedents will guide the High Court in this case. The precedent set by Judge Fennelly in AG V Scott Dyer (2004) in relation to Intent is relevant in our High Court case. I cite the precedent of Quinn VS Wren (1985) where deception and deceit showed the intent of the guilty party. The ingredients of fraud are all there as found by Justice Geoghan in Myles VS Sreenan (1999), and losses suffered by the injured parties are very large in our case. In the High Court case of EGAN V O' TOOLE [2005] the learned judge upheld the importance of intent combined with the use of false pretences and conspiracy to commit fraud in proving fraud and that this was and continues to be an offence in Ireland. The precedent set by Judge Walsh in the People vs Thompson (1960) in the Court of Criminal Appeal where the learned judge stated Intent can be inferred from the facts of the case is very relevant in our case.

As already noted above, Non Disclosure enabled and facilitated the false pretences used to promote these covid19 vaccines and boosters to the general public. In the High Court case of People (Attorney General) v Singer (1961), Judge O'Dalaigh stressed the importance of false pretences in proving fraud and this is evident here in this case. And false pretences involve some degree of planning and some degree of Intent to defraud, and this is also proven in our case. We can support that in the points below showing more examples of false pretences and have provided more examples in our sworn affidavits, exhibits statement of truth, and books of evidence. The High Court judgment of Judge O'Dalaigh in People (Attorney General) v Singer (1961) was a landmark case in Irish law and has great relevance to our case and indeed other court cases involving covid19.

Courts in Ireland and other countries have relied on a significant amount of strong circumstantial evidence in cases to enable them to draw inferences that certain claims are fraudulent. In Banco Ambrosiano SPA and Others v Ansbacher & Company Ltd and Others (1987), which was argued in the Supreme Court, Justice Henchy stated that:

"Proof of fraud is frequently not so much a matter of establishing primary facts as of raising an inference from the facts admitted or proved... If the Court is satisfied on balancing the possible inferences open on the facts, that fraud is the rational and cogent conclusion to be drawn, it should so find"

We have provided a large amount of evidence to the High Court some of it circumstantial and others very specific and detailed by foreign government bodies and others showing strong causality between mass covid19 vaccinations and a sudden large rise in excess mortality and in excess disability closely corresponding to the roll out of covid19 vaccines and boosters and also corresponding to autopsy findings

showing spike protein damage to several organs including the heart which was fatal. And this corresponded to the scientific findings in official government databases worldwide, Pfizer's internal documents released under a US federal court order, over 1,000 published scientific studies and many expert scientific reports worldwide. Our causality document, Exhibit 150, fulfils the Bradford Hill criteria in respect of causality. Inferences can be made by this High Court based on overwhelming and irrefutable evidence worldwide, presented by us to the court. The evidence in our court case is substantial and when combined together and viewed as a whole shows the balance of probabilities points to fraud in this court case. The precedent set for balance of probabilities in *Banco Ambrosiano SPA and Others v Ansbacher & Company Ltd and Others* (1987) is relevant here.

In the fraud cases of *Peter Slattery v Belinda McLoughlin & the MIBI*, *Ian Doyle v Belinda McLoughlin & the MIBI*, *Samantha Byrne v Belinda McLoughlin & Zurich Insurance Plc*, and *Jessica Byrne v Belinda McLoughlin & Zurich Insurance Plc*, before the Circuit Criminal Court, the learned Judge Groarke, stated the following about fraud

"there is a fraud where one party makes a material statement knowing it to be false, or without belief in its truth, or reckless, not caring if it is true or false. The conduct must be dishonest by the ordinary standards of reasonable and honest people."

This certainly applies in our court case, where false statements and the use of false pretences are obvious. The British court precedents are similar in this respect, for example, in *Welham VS DPP* (1960) before the High Court in England, Judge Lord Radcliffe described what 'defraud' means and the important role of knowingly using false statements and the Intent to defraud in this, and this applies in our court case. Many precedents were cited in that court case, and it is a landmark case in fraud. The involvement of many people in this fraud, leads us to cite *Scott v Metropolitan Police Commissioner* (1975) in England where fraud conspiracy was well described and applies here in our case. The precedent set in *R VS Warburton* (1870) also applies in our court case. In the USA, several fraud conspiracies have been prosecuted under the RICO act. This deals with highly organised fraud conspiracies and criminal conspiracies. The test for fraud in the USA is similar to that in Ireland and Britain.

As regards allegations of coincidences in relation to a sudden massive increase in excess mortality after mass covid19 vaccinations, I cite the statement of Judge Groarke in the Circuit Criminal Court in the four fraud cases mentioned above, where he stated this *"pushed the explanation of coincidence off the cliff"*. In other words the evidence clearly showed that the excuse of coincidences was not credible, not reliable, not believable and not true in the circumstances. By way of contrast, the excess mortality in lowly vaccinated countries was either very low or zero or in negative figures.

Judge Groarke's findings and judgment as regards his dismissal of coincidences has relevance to our court case. The evidence we provided to the High Court is very substantial and this means that the excuse of coincidences is not credible, not reliable, not believable and not true in the circumstances. And furthermore we can provide the High Court with a large number of vaccine injured people who will testify that they were healthy prior to getting the covid19 vaccinations and/or boosters and became ill or disabled after getting the vaccinations and/ or boosters. Also relatives of people killed by the vaccine or booster can testify similarly. We are not dealing with coincidences here in this court case.

The Non Disclosure of risks and dangers associated with a vaccine has significant case law and precedents. Non Disclosure enabled and facilitated the false pretences used to promote these covid19 vaccines and boosters to the general public. This placed the general public at a massive disadvantage and facilitated the fraud committed against them. Many of these precedents are mentioned in the Informed Consent section of our first Book of Authorities and our affidavits filed in the court, and some will be mentioned here. Non Disclosure still remains an important issue in these type of court cases, for example in Davis VS Wyeth (1968) the US 9th Circuit Court made the vaccine manufacturer liable for the injuries caused by their polio vaccine as there were inadequate warnings of risks and dangers supplied to the vaccine recipients and the general public. The California Court of Appeals took a similar approach and made a similar judgment in Grinnell v. Charles Pfizer & Co. (1969). And there was a similar judgment in Reyes v. Wyeth Laboratories (1974) in the USA. The precedent set in Givens v. Lederle (1975) was also similar. In Tinnerholm v. Parke-Davis & Co., the drug manufacturer was held negligent in failing to send out warnings to foreseeable users of new developments regarding the harmful side effects produced by its drug. Likewise, the court in Stromsodt v. Parke-Davis & Co. found the manufacturer liable for injuries caused by use of its drug on the basis of its failure to warn of dangers that were inherent in its use and that could have been discovered by adequately testing the product. The 'Davis test' concerning warnings about the risks and dangers of a vaccine or drug was and still is used in US courts and Canadian courts and is named after the aforementioned Davis VS Wyeth (1968) case heard before the US 9th Circuit Court.

The use of Non Disclosure, False Pretences, deception and fraud as stated above shows Dishonesty and the most recent case dealing with this is Ivey v Genting Casinos (UK) [2017] which was judged in the High Court and Supreme Court in Britain. Ivey lost the case due to his dishonesty and this case has set a new precedent in Britain where dishonesty is grounds for revoking a contract to pay a person involved in dishonesty and fraud. This echoes Judge Lord Denning's ruling in Beasley vs Lazarus estates (1956) where dishonesty and fraud unravels contracts and other types of agreements, and this also applies to politicians and civil servants involved in fraudulent contracts.

These court precedents cited above apply to the fraud involved in these covid19 vaccine contracts and to the covid19 vaccines and by extension to the vaccine passports based on this fraud and to the fraudulent measures and policies which led to an artificial demand for the vaccines, passports and lockdowns. There are strong legal grounds here for an Injunction and any other measures the High Court deems fit in the circumstances.

3. The Deprivation of Full and Valid Informed Consent. The Obtaining Informed Consent for vaccines by Non Disclosure, False Pretences, Fraudulent Misrepresentation, Deception and Fraud.

The court precedents regarding the deprivation of full and valid informed consent are listed and detailed in our affidavits filed in the court since November 2022 and in our statement of truth and our Book of Authorities filed in the High Court and given to the judge and defendants in March 2023. They apply here in the sense that informed consent was obtained by non disclosure, false pretences, fraudulent misrepresentation, deception and fraud. The court precedents we cite here are from Ireland, Britain, Europe and North America and apply in our pleading for fraud in this court case. We have cited over 30 court precedents from the superior courts in Ireland and these other countries to support our case here in the High Court and our pleading for fraud. We have also cited the breaches of the Irish Constitution, and the Natural Law as understood by the Irish Constitution and superior courts in Ireland, and international human rights, and international laws and treaties in this deprivation of informed consent for experimental covid19 vaccines and the damage caused to bodily integrity, the right to life and the right to earn a living.

4. The ingredients of fraud are all present in this High Court case

- 1) the making of a statement
- 2) the falsity of that statement
- 3) an Intent to deceive using that false statement including the use of false pretences. And an intent not to rectify and correct the false statement. And also Persisting in this fraud over time.
- 4) reasonable reliance on the statement by the injured party
- 5) the deliberate and calculated concealment of the truth which contradicted the false statement
- 6) injury and/ or losses sustained by the injured party as a result of this reliance
- 7) some gain or advantage achieved by the person(s) making the false statement
- 8) attempts to conceal and hide this fraud so as to avoid criminal liability and civil liability. This is an indirect admission of guilt.

The fraud being pleaded here, involves a fraud which caused massive losses to the Irish people and nation, who were the injured party, including physical health losses and loss of lives and massive financial

losses caused to the Irish people and nation and this has been deliberately done, and deliberately ignored, denied, and dismissed and even censored by some elected politicians and civil servants and government advisors and the fact that they placed foreign interests and profits above the welfare and health and lives of the Irish people and nation raises the charge of Treason against those politicians, civil servants and government advisors responsible for this. The Irish Constitution makes these people accountable to the people of Ireland not to vaccine companies and foreign interests. The facts and evidence show that the Irish Constitution was attacked, and Irish Constitutional rights were attacked, and Irish Natural Law rights were attacked and the dignity and standing of the Irish courts were attacked, the Human Rights of the Irish people were attacked by these aforementioned people for the financial benefit of foreign interests. And this attack has been ongoing since 2020, inflicting massive losses on the Irish people and nation, which is continuing into the present day. This points to Treason.

The High Court must make a distinction between elected politicians who serve the Irish people and nation and the national interest as stated in the Irish Constitution of 1937 on one side and on the other side those elected politicians who serve Globalist interests not national interests, and place these Globalist interests above the interests of the Irish people and nation and the national interest. And indeed endanger and even destroy the lives, the health and the well being of the Irish people and nation to serve these Globalist interests and their profit interests and their Globalist political agenda. And some of these elected politicians and their advisors and civil servants are members and attendees at Globalist meetings where Globalism is preached and nationalism is condemned and actively opposed and the desire to destroy nationalism is openly expressed. The evidence produced to this court is damning as regards the covid19 vaccines and boosters and their relationship to the large rise in excess mortality, actual mortality, disability figures, the big difference in death rates between vaccinated and unvaccinated people, the Causality outlined in Exhibit 150, and the many types of serious illnesses, disabilities and deaths which foreign governments and health and statistical authorities have found and even Pfizer in their internal documents have admitted to. The evidence is overwhelming and irrefutable. We are all in very new territory here as regards the courts, the legal system and politics in Ireland today. The legal reason for an Injunction is clear and has been proven here and in our evidence and documentation given to the court in the sense of protecting the Irish people and nation and the High Court has power to implement this Injunction and any other measures it deems fit to further protect the Irish people and nation and enforce justice and restitution in these circumstances.

I cite some of the laws which apply here in this case:

THE USE OF THIS FRAUD TO ATTACK THE IRISH CONSTITUTION AND CONSTITUTIONAL RIGHTS AND HUMAN RIGHTS AND CIVIL RIGHTS. THE IMPOSITION OF TOTALITARIANISM ON THE IRISH NATION

CONTRARY TO THE IRISH CONSTITUTION AND LAWS AND THE WILL OF THE IRISH PEOPLE. THIS MAY CONSTITUTE THE CRIME OF TREASON.

TREASON ACT 1939

AND

OFFENCES AGAINST THE STATE (AMENDMENT) ACT, 1998

OFFENCES AGAINST THE STATE ACT, 1939

AND

CRIMINAL JUSTICE ACT 1990

On the Substantive issues of Fraud and Treason mentioned in the point above, this High Court case revolves around important Irish Constitutional issues and breaches of the Irish Constitution and the need for full accountability by elected politicians and senior civil servants, all of which affect the Public Interest and the Common Good. I cite the Irish Constitution of 1937:

'All powers of government, legislative, executive and judicial, derive, under God, from the people whose right it is to designate the rulers of the State, and in final appeal, to decide all questions of national policy, according to the requirements of the common good'

Under the Irish Constitution, the power belongs to the people of Ireland, and it is important to realise that the elected politicians and senior civil servants serve the people of Ireland and are accountable to the people of Ireland. They do not serve and are not accountable to big vaccine companies or Big Pharma or their lobbyists or foreign Globalist institutions. This is a very important point. This accountability by government is meant to protect, maintain and uphold the Fundamental rights of the Irish people as stated in articles 40 to 44 of the Irish Constitution, and the Natural Law rights and unenumerated rights of the people in the Irish Constitution. In this High Court case we are dealing with breaches of Constitutional rights and Natural Law rights, specifically the right to bodily integrity and right to life. In this High Court case we are dealing with breaches of Constitutional rights and Unenumerated rights and Natural Law rights, specifically the right to bodily integrity and right to life. These rights are among the most important Constitutional rights and Natural Law rights a living person can have, and are so absolutely fundamental to the Common Good and Public Interest that the breaching of them in this case requires urgent remedy from the High Court or Supreme Court namely Injunctions and any other remedies the courts deem fit.

This accountability is enforceable and can be enforced through the separation of powers, by means of judicial independence, of legislative independence, and of executive independence which empowers and allows each branch of government to act as a check and balance against the other to ensure full accountability to the other branches of government and full accountability to the people of Ireland. And

there is one further means of accountability, that being freedom of the press and media to hold all branches of the government to account and make them totally accountable to the people of Ireland. This is Irish Constitutional democracy. This High Court case involves these separation of powers and a free press and media and full accountability to the people of Ireland.

Fundamental to this accountability to the people of Ireland as defined in the Irish Constitution is the issue of full Disclosure and the provision of full information to the people and fully informed decision making by the people and the giving of full and valid informed consent for experimental covid19 vaccines by the people and the accompanying protection of the bodily integrity of the people of Ireland. It these failures of accountability which are being addressed in this High Court case. These issues of accountability affect life and death for people and serious illnesses and disabilities for people, involving their bodily integrity and thus directly affect the Fundamental rights and unenumerated of the people of Ireland as defined in articles 40 to 44 in the Irish Constitution and previous judgments of the High Court and Supreme Court.

Ultimately the executive is accountable to the people of Ireland and the Irish Constitution and the judiciary must act as a check and balance here. Executive over-reach is being argued here in the context of dangers to the health of the people of Ireland and deliberate non disclosure of this to the people of Ireland. The crux of the matter is does the executive have the legal right to not disclose the dangers of these vaccines to the public, and then poison the public with these vaccines and obtain informed consent for these vaccines by non disclosure, false pretences, fraudulent misrepresentation, deception and fraud ? Does the executive have a mandate from the people of Ireland to do that ? the answer is 'No'. This is a clear case of executive over-reach and wrong doing and indeed criminal activity.

The failure in this accountability by the executive and by elected politicians and senior civil servants is clear, and has resulted in many lives being lost and many more will be lost this year and in subsequent years and many thousands of previously healthy Irish people are condemned to suffer serious illness and disabilities now and into the future. This outrageous crime against the Irish people and nation needs to be addressed by this court and other courts around Ireland and possibly the international courts also.

5. The Domino Effects of Fraud

Fraud is not an isolated crime. Fraud has Domino Effects or a ripple effect, where it leads to other frauds or crimes or breaches of the criminal law and civil law and/or breaches of the Constitution and Human Rights and international law. For example, one fraud could lead to the committing of many other crimes, frauds, and injustices and to losses on a massive scale. The fraud associated with the covid19 vaccine is a good example of this. This will be examined in the points below.

6. The Civil and Criminal laws and court precedents regarding fraud.

The High Court needs to be mindful of the following facts in this court case:

(i) that the fraud here has civil aspects and criminal aspects and this is highly relevant as this court case involves significant risk and danger to the lives of children in Ireland and to families in Ireland.

(ii) The Irish Constitution gives special protections to families and children. I cite article 42a of the Irish Constitution:

‘ 1. The State recognises and affirms the natural and imprescriptible rights of all children and shall, as far as practicable, by its laws protect and vindicate those rights.’

And I cite article 41 the Irish Constitution giving families *‘inalienable and imprescriptible rights, antecedent and superior to all positive law’*

And the protection of these Constitutional rights will require the use of an Injunction in this case. Court Injunctions can and have been put in place to prevent frauds, stop frauds, punish frauds, and to protect rights and to save lives in the past. This court case involves these issues.

The High Court needs to be made aware of the breaches of the laws involved here when considering whether to give an Injunction in this case. Irish law and international law have specific provisions for prosecuting fraud in the courts and also provisions for preventing fraud and for stopping fraud which is taking place. The Irish law and courts have made fraud a serious criminal offence and civil offence, and it has been prosecuted in both the criminal courts and civil courts in the past, including the High Court and Supreme Court. Obtaining the informed consent of people for a vaccine, a medical drug or any product or service by non disclosure, deception and fraud which

(a) leads to serious injury, illness, disability or death to the injured parties and

(b) to significant financial losses for the injured parties, including monetary loss, job/ career loss, business loss, family loss, home loss, asset loss

and there is the involvement of state officials in this fraud and the accompanying misuse of taxpayer’s money and state resources in this fraud, and the use of false advertising in the press and media, and there is the threatening and blackmailing of medical doctors for political reasons in this fraud and the falsifying of causes of death for political reasons in this fraud are the criminal offences of:

(i) fraud. Conspiracy to defraud is a common law offence which has been prosecuted many times in the Irish courts.

(ii) assault and battery in terms of vaccine injuries, illnesses, and disabilities and premature deaths. This has been prosecuted in Irish courts in the past.

(iii) poisoning causing injury, illness or death. This has been prosecuted in Irish courts in the past.

(iv) voluntary or involuntary manslaughter in the case of deaths caused by vaccine / medical product / medical procedure. This has been prosecuted in Irish courts in the past.

(v) Reckless Endangerment of Children

(vi) massive financial losses for the vaccine injured, ill and disabled and the families of those people killed by the covid19 vaccines. Fraud which leads to massive losses. And also theft through fraud.

(v) unlawful and illegal vaccine mandates in some sectors of the economy and vaccine passports based on this fraud which coerced people into getting the vaccines and breached their legal and Constitutional right to informed consent. This coercion led to a continuation of these frauds including the obtaining of informed consent by non disclosure, deception and fraud. A fraud which has placed the lives of many people in danger.

Some of the laws which apply here in this case

- **THEFT AND FRAUD OFFENCES ACT 2001**

PART 2

Section 4. Theft and Related Offences

Section 6. Making gain or causing loss by deception

Section 7. Obtaining services by deception

Sections 9 and 10.

Section 11. Suppression, etc., of documents.

Section 14. Robbery

Section 21

Section 26. Using false instrument

Section 27.

Sections 43 and 44. Corruption

Section 56. Orders for Restitution

- **CRIMINAL JUSTICE (CORRUPTION OFFENCES) ACT 2018**

PART 2 Corruption Offences

Section 5. Active and passive corruption

Section 6. Active and passive trading in influence

Section 7. Corruption in relation to office, employment, position or business

Section 8.

Section 9.

Section 10: Intimidation

PART 4 Presumptions Relating to Corruption

Section 14.3

PART 3

Sections 11 – 13

This Act contains several corruption offences, namely:

- active and passive corruption;
- active and passive trading in influence;
- corruption in relation to office, employment, position or business;
- giving a gift, consideration or advantage that may be used to facilitate an offence; • creating or using a false document; and
- intimidation.

The Act also defines “corruptly” broadly, to include acting with an improper purpose personally or by influencing another person(s), whether:

- by means of making a false or misleading statement;
- by means of withholding, concealing, altering or destroying a document or other information; or
- by other means

CONSPIRACY TO DEFRAUD IS A COMMON LAW OFFENCE. EGAN V O' TOOLE [2005] IEHC 413

SECTION 5 OF CRIMINAL LAW (JURISDICTION) ACT, 1976

COMMON LAW OFFENCE OF MISCONDUCT IN PUBLIC OFFICE

Part I to Part VI OF ETHICS IN PUBLIC OFFICE ACT, 1995

Politicians and their advisors and state officials may also be guilty of secondary criminal offences. Irish law makes it an obligation and a legal duty to report crimes to the gardai if one believes that crimes have been committed. Section 19 of the Criminal Justice Act 2011 (“the 2011 Act”) establishes that a person/corporate entity will be guilty of an offence: If they have information; and. ... they fail without a reasonable excuse to disclose that information as soon as it is practicable to do so to An Garda Síochána (the Irish police force).

and Section 8 of Criminal Law Act, 1997

ARTICLE K.3 (2) (C) OF THE TREATY ON EUROPEAN UNION AND EUROPEAN COUNCIL ACT OF 26 MAY 1997

THE ENGLISH CASE OF R. V. DYTHAM [1979] QB 722

ALL SECTIONS OF EU CRIMINAL LAW CONVENTION ON CORRUPTION - CRIMINAL LAW CONVENTION ON CORRUPTION (ETS 173)

• CRIMINAL CONSPIRACY TO COMMIT FRAUD AND CRIME(S)

In the USA and other jurisdictions, these are called ‘RICO charges’ and have led to successful prosecutions in many cases.. Government and state officials and politicians can be made subject to these type of

charges.

Section 71 Offence of Criminal Conspiracy

Section 72 Organised crime

Section 73 Commission of offence for criminal organisation

OF CRIMINAL JUSTICE ACT 2006

In Scott v Metropolitan Police Commissioner (1975) in England fraud conspiracy was well described and applies here.

The precedent set in R VS Warburton (1870) also applies in our court case. Injury has been caused to many, many people and losses have been very large.

- **SECTION 5 OF CRIMINAL LAW (JURISDICTION) ACT, 1976**

Deliberately causing financial losses to individuals, families, businesses through frauds and threats associated with the covid19 vaccines, vaccine passports and discrimination and the threat of criminal prosecution, vaccine mandates in workplaces and the threat of losing one's job / career, and/or the strategic use of lockdowns to drive this fraud.

- **INVOLUNTARY MANSLAUGHTER INCLUDING MANSLAUGHTER BY AN UNLAWFUL AND DANGEROUS ACT AND GROSS NEGLIGENCE MANSLAUGHTER. AND THE OFFENCE OF POISONING. AND THE OFFENCE OF ASSAULT.**

- Section 5 **OF OFFENCES AGAINST THE PERSON ACT, 1861**

- Section 4, (1) **OF CRIMINAL JUSTICE ACT, 1964**

- Section 6, 2(b)

OF CRIMINAL JUSTICE ACT, 1990

THE PEOPLE (DPP) V CULLAGH (1998)

THE PEOPLE (DPP) V WAYNE O'DONOGHUE (2005)

- SECTIONS 12 AND 13 OF THE NON FATAL OFFENCES AGAINST THE PERSON ACT 1997
- ARTICLE 32 OF THE GENEVA CONVENTION 1949
- NUREMBERG CODE 1947

- **LEGAL DUTY TO REPORT FRAUD AND CRIME**

The Irish Constitution and Constitutional Rights, Human Rights and Irish Democracy are endangered here. The reporting and prosecution of crimes in courts is a legal and Constitutional requirement which applies

to all persons in Ireland regardless of their position. Any obstruction or interference in this is a perversion of the course of justice. This applies at all stages including reporting criminal offences, police investigations, prosecution decisions and processes, court dates and processes, etc.. All persons are subject to this.

Politicians and their advisors and state officials may also be guilty of secondary criminal offences. Irish law makes it an obligation and a legal duty to report crimes to the gardai if one believes that crimes have been committed.

Section 19 of the Criminal Justice Act 2011 (“the 2011 Act”)

establishes that a person/corporate entity will be guilty of an offence: If they have information; and. ... they fail without a reasonable excuse to disclose that information as soon as it is practicable to do so to An Garda Síochána (the Irish police force).

SECTION 8 OF CRIMINAL LAW ACT, 1997

CRIMINAL JUSTICE ACT, 2011

SWEENEY V IRELAND, 2019

Section 7. Penalties for assisting offenders

Section 8. Penalty for concealing offence

OF CRIMINAL LAW ACT, 1997

COMMON LAW OFFENCE OF PERVERTING THE COURSE OF JUSTICE

OFFENCES AGAINST THE STATE (AMENDMENT) ACT, 1998

OFFENCES AGAINST THE STATE ACT, 1939

Section 27 **OF** CRIMINAL JUSTICE (CORRUPTION OFFENCES) ACT 2018

- **CLINICAL NEGLIGENCE**

PART 15 Clinical Negligence Actions - **219.** (1) The Civil Liability and Courts Act 2004 is amended by inserting the following Part after Part 2: PART 2A Clinical Negligence Actions

OF LEGAL SERVICES REGULATION ACT 2015

- **FALSIFYING DEATH CERTIFICATES AND CAUSES OF DEATH**

Sections 69 - 71

OF CIVIL REGISTRATION ACT 2004

- **INFORMED CONSENT NOT GIVEN IN IRELAND**

BREACH OF EMA REGULATIONS AND EU REGULATIONS AND IRISH LAWS REGARDING LISTING OF ALL SIDE EFFECTS OF COVID19 VACCINES AND EXPLAINING THESE TO ALL PERSONS BEFORE THEY RECEIVE THESE VACCINES.

AND AS THIS IS A VACCINE EXPERIMENT UNTIL 2023 THE IRISH GOVERNMENT AND HSE HAVE NOT STATED AND IDENTIFIED THE CONTROL GROUP AND THE PLACEBO USED AND PLACEBO GROUP AS REQUIRED UNDER IRISH LAW AND EU LAW AND EMA REGULATIONS AND MEDICAL ETHICS

IRISH LAWS AND EU DIRECTIVES / LAWS GOVERNING CLINICAL TRIALS OF VACCINES AND MEDICAL PRODUCTS AND INFORMED CONSENT IN IRELAND

EU PARLIAMENTARY ASSEMBLY RESOLUTION 2361

EU PARLIAMENTARY ASSEMBLY RESOLUTION 2071

NUREMBERG CODE 1947

[EU Directive 2001/82/EC](#), The amendments are incorporated into the [consolidated text of Directive 2001/82/EC](#);

[EU Directive 2001/83/EC](#) on the Community code relating to [medicinal products](#) for human use, as amended. The amendments are incorporated into the [consolidated text of Directive 2001/83/EC](#);

[EU Regulation \(EC\) No 726/2004](#), laying down Community procedures for the authorisation and supervision of [medicinal products](#) for human and veterinary use and establishing a European Medicines Agency, as amended. The amendments are incorporated into the [consolidated text of Regulation \(EC\) No 726/2004](#).

CONSUMER PROTECTION ACTS 2007 AND 2014

LAWS REGARDING SERIOUS ASSAULT AND GREIVIOUS BODILY HARM

ARTICLE 32 OF THE GENEVA CONVENTION 1949

- **RECKLESS ENDANGERMENT OF CHILDREN**

CRIMINAL JUSTICE ACT 2006

- **THREATS, BLACKMAIL AND EXTORTION AND WITNESS INTIMIDATION AGAINST MEDICAL DOCTORS, NURSES, HSE STAFF INCLUDING AGENCY STAFF, SCIENTISTS AND PUBLIC SERVANTS**

Section 17. Blackmail and Extortion

OF CRIMINAL JUSTICE (PUBLIC ORDER) ACT, 1994

Section 41. Intimidation etc. of witnesses, jurors and others

OF CRIMINAL JUSTICE ACT, 1999

- **FALSE ADVERTISING REGARDING SAFETY OF COVID19 VACCINES AND EFFECTIVENESS OF COVID19 VACCINES AND THE NEED FOR LOCKDOWNS AND FALSE STATEMENTS REGARDING THE NON EXISTENCE OF SAFE AND EFFECTIVE MEDICINES FOR COVID19 SUCH AS IVERMECTIN, HYDROXYCHLOROQUINE, ETC.**

This includes NPHET and Tony Holohan and the head of the HSE the Minister for Health and RTE and Dr. Luke O'Neill who appeared on RTE, a state sponsored television station which is controlled by the state, in relation to this many times.

Breaches of

CONSUMER PROTECTION ACTS 2007 AND 2014

COMMON LAW. THE MOST RELEVANT AREAS OF COMMON LAW ARE PASSING OFF, DEFAMATION AND MALICIOUS FALSEHOOD

THE BROADCASTING ACT 2009 AND THE EC (AUDIOVISUAL MEDIA SERVICES)REGULATIONS 2010 (AS AMENDED)

- **THE USE OF FRAUD TO ILLEGALLY RESTRICT COMPETITION.
ANTI COMPETITIVE PRACTISES.**

Safe and effective medicines for successfully treating covid19 were illegally and unlawfully blocked and banned by the state from May 2020 onwards. The use of these medicines could have saved thousands of lives. The obvious purpose of blocking and banning these effective and safe medicines was to create an artificial demand for lockdowns and for covid19 vaccines. This is detailed in our books of evidence and sworn affidavits filed in the High Court.

Sections 4 - 8

OF COMPETITION ACT, 2002

- **THE USE OF FRAUD TO IMPOSE UNLAWFUL AND ILLEGAL DISCRIMINATION AND APARTHEID IN IRELAND THROUGH THE INTRODUCTION OF COVID VACCINE PASSPORTS OR CERTIFICATES IN SOCIETY AND VACCINE MANDATES IN MANY WORKPLACES. UNLAWFUL AND ILLEGAL DISCRIMINATION AGAINST UNVACCINATED PEOPLE AND CRIMINAL DEPRIVATION OF AND BREACHES OF THEIR CONSTITUTIONAL RIGHTS AND HUMAN RIGHTS. AND CONSTRUCTIVE DENIAL OF THE CONSTITUTIONAL RIGHTS OF THE PEOPLE IN IRELAND**

All Sections **OF EQUAL STATUS ACTS 2000 – 2015**

All Sections **OF** EMPLOYMENT EQUALITY ACTS 1998 – 2015

Articles 40 - 44 **OF** IRISH CONSTITUTION 1937 AND CONSTRUCTIVE DENIAL OF THESE
CONSTITUTIONAL RIGHTS

Article 15 and

13th Amendment to the Irish Constitution and Article 40.3.3º

34th Amendment to the Irish Constitution and Article 40 of the Constitution

OF THE IRISH CONSTITUTION 1937

THE UNENUMERATED RIGHTS OR INALIENABLE RIGHTS OR NATURAL LAW RIGHTS IN THE IRISH
CONSTITUTION OF 1937 UPHELD IN THE SUPREME COURT AND HIGH COURT INCLUDING THE FOLLOWING
COURT PRECEDENTS:

McGee v. The Attorney General

Ryan v Attorney General

Cox v Ireland

Kennedy v Ireland

Attorney General v X

The State (Healy) v Donoghue

State (Trimbole) v Governor of Mountjoy Prison

A. v The Governor of Arbour Hill Prison

McKinley v Minister for Defence

G v An Bord Uchtála

NHV v Minister for Justice

Byrne v Ireland

AM v Refugee Appeals Tribunal

Merriman v Fingal County Council

Carter v Minister for Education and Skills

CONSTRUCTIVE DENIAL OF CONSTITUTIONAL RIGHTS CONTRARY TO IRISH CONSTITUTION 1937

Article 2

Article 3

Article 5

Article 8

Article 9

Article 10

Article 11

Article 14

Article 17

Protocol No. 4, Article 2

OF EUROPEAN CONVENTION ON HUMAN RIGHTS 1953

TITLE I

TITLE II

TITLE IV

TITLE V

TITLE VII

OF CHARTER OF FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION

ALL ARTICLES **OF UN DECLARATION OF HUMAN RIGHTS 1948**

All Sections **OF CHARTER OF FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION**

All Sections **OF THE NUREMBERG CODE 1947 (WHICH IS LEGALLY BINDING IN IRELAND)**

ARTICLE 58 of the Siracusa Principles on Limitations and Exceptions to the International Covenant on Civil and Political Rights (1958)

- **THE USE OF THIS FRAUD TO CAUSE THE ARREST AND FALSE IMPRISONMENT OF PEACEFUL PROTESTORS AND PERSONS ACCUSED OF BREAKING THE UNCONSTITUTIONAL AND UNLAWFUL LOCKDOWN LAW AND VACCINE PASSPORT LAW**

Section 15 **OF NON-FATAL OFFENCES AGAINST THE PERSON ACT, 1997**

Section 11 **OF CRIMINAL LAW ACT, 1976**

- **THE USE OF THIS FRAUD TO CRIMINALISE INNOCENT PEOPLE SUCH AS PEACEFUL PROTESTORS AND PERSONS EXERCISING THEIR CONSTITUTIONAL RIGHTS AND HUMAN RIGHTS THROUGH THE BRUTAL ENFORCEMENT OF UNCONSTITUTIONAL LOCKDOWNS AND VACCINE PASSPORT DISCRIMINATION AND WORKPLACE MANDATES AND BRINGING FALSE CHARGES AGAINST THEM**

COMMON LAW OFFENCE OF PERVERTING THE COURSE OF JUSTICE

NON-FATAL OFFENCES AGAINST THE PERSON ACT, 1997

- **THE USE OF THIS FRAUD TO INCITE HATRED AGAINST THE UNVACCINATED AND ANTI LOCKDOWN PROTESTORS WHICH LED TO THREATS AGAINST AND HARASSMENT OF THESE PEOPLE**

PROHIBITION OF INCITEMENT TO HATRED ACT 1989

Section 10 Harassment

Section 5 Threats to Kill

Section 2 Assault

Section 3 Assault causing Harm

Section 13 Endangerment

OF NON-FATAL OFFENCES AGAINST THE PERSON ACT, 1997

- **THE USE OF THIS FRAUD TO CAUSE THE UNLAWFUL HARASSMENT OF PERSONS ATTENDING CHURCH SERVICES AND RELIGIOUS SERVICES BY POLICE AND ILLEGALLY DISCRIMINATE AGAINST AND HARASS UNVACCINATED PERSONS ATTENDING RELIGIOUS SERVICES WHICH WAS UNCONSTITUTIONAL INTERFERENCE IN RELIGION AND THE RIGHT TO FREEDOM OF RELIGION**

Articles 40 - 44 **OF** THE IRISH CONSTITUTION 1937

Article 9 **OF** EUROPEAN CONVENTION ON HUMAN RIGHTS 1953

Article 18 **OF** THE UN DECLARATION OF HUMAN RIGHTS

ARTICLE 10 **OF** THE EU CHARTER OF FUNDAMENTAL RIGHTS

- **THE USE OF THIS FRAUD TO ATTACK THE IRISH CONSTITUTION AND CONSTITUTIONAL RIGHTS AND HUMAN RIGHTS AND CIVIL RIGHTS. THE IMPOSITION OF TOTALITARIANISM ON THE IRISH NATION CONTRARY TO THE IRISH CONSTITUTION AND LAWS AND THE WILL OF THE IRISH PEOPLE. THIS MAY CONSTITUTE THE CRIME OF TREASON.**

TREASON ACT 1939

AND

OFFENCES AGAINST THE STATE (AMENDMENT) ACT, 1998

OFFENCES AGAINST THE STATE ACT, 1939

AND

CRIMINAL JUSTICE ACT 1990

- **THE USE OF THIS FRAUD TO CARRY OUT CENSORSHIP OF RTE AND THE PRESS AND MEDIA AND OF MEDICAL DOCTORS AND SCIENTISTS ON THESE COMMUNICATIONS MEDIUMS AND THE ABUSE OF CONSTITUTIONAL RIGHTS FOR THE PURPOSE OF THE SPREADING OF LIES IN THE PRESS AND MEDIA**

Article 40 **OF** IRISH CONSTITUTION 1937

Article 19 **OF** THE UN DECLARATION OF HUMAN RIGHTS

Article 10 **OF** EU CONVENTION ON HUMAN RIGHTS

Article 11 **OF** THE EU CHARTER OF FUNDAMENTAL RIGHTS

- **UNLAWFULLY PROFITEERING FROM THIS FRAUD. THE PROCEEDS OF CRIME CAN BE INVESTIGATED, FROZEN AND SEIZED.**

PROCEEDS OF CRIME (AMENDMENT) ACT 2016

CRIMINAL ASSETS BUREAU ACT 1996

PROCEEDS OF CRIME ACT 1996

Section 7

OF CRIMINAL JUSTICE (MONEY LAUNDERING AND TERRORIST FINANCING) ACT 2010

and the civil offences of

(i) the tort of fraud or tort of deceit and fraudulent misrepresentation

(ii) medical negligence and medical malpractice

(iii) civil actions in the civil courts arising from the crimes mentioned above

(iii) breach of one's Constitutional right to bodily integrity and/or the right to life

(iv) breaches of one's Constitutional rights, unenumerated rights, Natural Law rights and international Human Rights detailed in the section above titled

THE USE OF THIS FRAUD TO IMPOSE VACCINE PASSPORTS AND UNLAWFUL AND ILLEGAL DISCRIMINATION AND IMPOSE CRIMINAL DEPRIVATION OF AND BREACHES OF CONSTITUTIONAL RIGHTS AND HUMAN RIGHTS. AND IMPOSE CONSTRUCTIVE DENIAL OF CONSTITUTIONAL RIGHTS ON THE PEOPLE OF IRELAND

7. Under the Irish Constitution all people are equal before the law, there is no special provision to protect those persons or organisations who manufacture vaccines and who commit fraud and cause losses, both financial losses and human life and human health losses, including physical harm, death, serious injuries or disabilities to the general public and losses of job, career, money etc.. And there is no legal immunity for state officials and elected politicians and government advisors. I cite the Irish Supreme court precedent of

Best v Wellcome Foundation Ltd

where a corporate entity had to take financial and legal responsibility for damage done to a person by a vaccine. In this respect Irish courts have a Constitutional and legal duty of care to ensure that members of the general public are not put at high risk of death or serious injury, illness or disability and accompanying

financial losses from an experimental vaccine or medical product or procedure and the blatant non disclosure of these risks and dangers to the general public. And covid19 vaccines are within this category.

8. Fraud unravels everything including Indemnities, Contracts, Ministerial Protections, Corporation Sole Protections and Parliamentary Protections or Dail Protections

Ministers, politicians and senior civil servants and government advisors are governed by a code of conduct, the Constitution and laws. This code of conduct, the Constitution and laws governing their position including the Ministers and Secretaries act 1924 as amended does not include:

(a) a right to commit frauds or participate in frauds or promote frauds or assist frauds in any way or allow frauds to be committed or ignore frauds being committed

(b) place the lives of the Irish people and nation in serious danger from these frauds

(c) hide behind a Ministerial protection and/or a corporation sole so as to avoid criminal liability and civil liability for the frauds stated in the points above

The evidence in our sworn affidavits, and exhibits, statement of truth, and books of evidence and first Book of Authorities and this Book of Authorities shows that some Ministers and senior civil servants and government advisors at the very least allowed serious frauds to be committed or ignored frauds being committed and at worst assisted these frauds or participated in these frauds and/or promoted these frauds. The fact that some Ministers and senior civil servants acted outside their code of conduct, the Constitution and laws governing their position including the Ministers and Secretaries act 1924 as amended means that they lose the protections of these positions or corporation soles. They were acting outside their role as Minister or senior civil servant or government advisor, they were acting outside their jurisdiction.

This fraud makes the vaccine contracts null and void and makes the indemnities null and void and makes those persons, companies, politicians, and state bodies who manufactured or sold, or marketed or promoted or injected these vaccines personally liable under the civil law and the criminal law.

As cited above in Lord Dennings case of Lazarus Estates Ltd v Beasley [1956], fraud unravels everything including contracts, laws, indemnities, government policies, Ministerial protections, corporation sole protections, parliamentary protections or Dail protections, national and international agreements, financial gains and assets made through fraud, etc.

This means elected politicians, Ministers, and senior civil servants lose their Ministerial protections and TD protections and corporation sole protections. They can be sued and prosecuted in their personal capacity as living men and women who are legally obliged to take personal responsibility for their actions here, and as these actions involve various degrees of fraud, they must answer for this and be made liable

for this as living men and women in courts of law.

9. Restitution and Compensation

This fraud makes the vaccine contracts null and void and makes the indemnities null and void and makes those persons, companies, politicians, and state bodies who manufactured or sold, or marketed or promoted or injected these vaccines personally liable under the civil law and the criminal law.

Fraud is both a crime and a tort, incurring both criminal liability and civil liability. The legal principle of Restoration in original condition or **Restitutio in Integrum** can provide effective redress and compensation for the injured parties of this fraud. The precedent set by Judge Lord Denning in *Beasley vs Lazarus estates* (1956) and other superior court precedents in Ireland, Britain and North America, some cited here and in other documents we filed in the High Court show that fraud unravels everything including contracts between governments and vaccine companies, indemnities, Ministerial protections, corporation sole protections, parliamentary protections or Dail protections, and financial gains and assets made through fraud. Fraud unravels all of these and makes null and void in law. The people and businesses responsible for manufacturing, approving, selling, promoting and injecting the covid19 vaccines are liable under the criminal law and civil law and can be sued by those people who suffered losses from these covid19 vaccines ; this includes injuries, illnesses, disabilities and deaths caused by the covid19 vaccines and loss of job or career, income, home, one's family, and one's assets as a result of the covid19 vaccinations.

Those people injured, made seriously ill or disabled or killed by the covid19 vaccines were duped by fraudulent claims about this vaccine. They relied on the fraud and legally should not have to bear financial responsibility for the consequences of the fraud, wrong doing and crimes committed by others against them. The courts here in Ireland and abroad have demanded that those people or entities guilty of committing fraud must be made to pay restitution to and compensate the injured party, which in this case are the vaccine injured, ill, disabled, and dead.

Settlements totalling more than €4.5 million have been approved by the High Court in Ireland in three cases over the administration of a swine flu vaccine which caused a sleep disorder. The cases involve two people under the age of 18 and an adult man who cannot be identified by court order. The cases were against the Minister for Health, the HSE, and Glaxosmithkline Biologicals SA (GSK) – the producer of swine flu vaccine Pandemrix. I cite the Irish Times article about this from July 29th 2021.

Important precedents from the superior courts in the USA are relevant here. In *Davis VS Wyeth* (1968) the US 9th Circuit Court made the vaccine manufacturer liable for the injuries caused by their polio vaccine as there were inadequate warnings of risks and dangers supplied to the vaccine recipients. The

California Court of Appeals took a similar approach and made a similar judgment in *Grinnell v. Charles Pfizer & Co.* (1969). And there was a similar judgment in *Reyes v. Wyeth Laboratories* (1974) in the USA. The precedent set in *Givens v. Lederle* (1975) was also similar. In *Tinnerholm v. Parke-Davis & Co.*, the drug manufacturer was held negligent in failing to send out warnings to foreseeable users of new developments regarding the harmful side effects produced by its drug. Likewise, the court in *Stromsodt v. Parke-Davis & Co.* found the manufacturer liable for injuries caused by use of its drug on the basis of its failure to warn of dangers that were inherent in its use and that could have been discovered by adequately testing the product. The 'Davis test' concerning warnings about the risks and dangers of a vaccine or drug was and still is used in US courts and is named after the aforementioned *Davis VS Wyeth* (1968) case heard before the US 9th Circuit Court.

The US National Swine Flu Immunization Program was hastily enacted in August 1976, the federal government assumed full liability for adverse events under its *voluntary* program. Indeed, then-US president Gerald Ford went on national television to plead with citizens to get vaccinated, and some forty million Americans did. The swine flu onslaught never materialized. After the immunization program was suspended in December 1976, hundreds of claims were brought chiefly by individuals who had contracted Guillain-Barré syndrome (GBS), a rare and painful neurological disorder. In *Unthank v. United States* (1984), the government conceded that its standard warnings for Guillan Barre Syndrome were inadequate, causing the Tenth Circuit Court to "liberally" construe the 1976 Act and conclude that "[a]gainst that background, it would be a travesty to suggest that people who hurriedly signed the standardized form presented to them were adequately informed of the risks." Those people injured by this vaccine were compensated by the Federal government.

In the Supreme Court case of *Delahunty v Player and Wills (Ireland) Ltd* (2006) the court gave a woman permission to take action for damages against two major tobacco companies. She got cancer from smoking and for many years and decades she had not been warned about the dangers and risks of smoking and her life had been placed in considerable danger. Smoking was promoted as being safe and fun when she was a young girl. This bears a close resemblance to the covid19 vaccines and the untruthful message of them being "safe and effective" which has now been discredited by the evidence.

In Philp v Ryan & Anor [2004] the Irish Supreme Court awarded compensation to a victim of medical negligence which caused him a loss of "life expectancy". It is well established that the damage caused by the covid19 vaccines will cause a loss of life expectancy for many people, and this unfortunately has arrived very early for those people who suffered "sudden deaths" after getting the covid19 vaccination. The massive rise in excess mortality in 2022 and into 2023 attesting to this fact. The many serious illnesses

and disabilities associated with the covid19 vaccinations means this Supreme Court precedent is very relevant in our case.

Res Ipsa loquitur (Latin: *"the thing speaks for itself"*)

In the Supreme Court case of Doherty v Reynolds and St. James's Hospital Board [2004], the legal principle of Res ipsa loquitur was applied. This means the only reasonable and logical explanation in the circumstances was medical negligence and he was entitled to compensation. The same applies to those people made ill or disabled or killed shortly after receiving the covid19 vaccines. This has a bearing on who is liable and who must compensate the injured parties.

In the precedent of USA VS Huachillo, 2015, Oscar Huachillo was sentenced to 87 months in prison and fined \$3,454,244 restitution plus \$31,177,987 forfeiture as a result of his arrest in 2013. Huachillo defrauded Medicare of over \$31 million while evading over \$3.4 million in federal income taxes.

- 10.** The Irish government and health authorities claimed and still claim that the covid19 vaccines are “safe and effective” yet this was untrue as
- (a)** the medium term safety and long term safety of the vaccine was never established and unknown according to Pfizer and other vaccine companies and scientists and scientific studies
 - (b)** the vaccine was in Phase 3 trial until mid 2023
 - (c)** massive amounts of scientific, medical, autopsy, government database, and statistical data from around the world including Pfizer’s own internal documents released under a Federal Court order showed these vaccines were not safe and not effective.

It takes from 5 to 10 years to establish the safety and effectiveness of vaccines and other medical products. The covid19 vaccine trial lasted for about 6 months. This time period was far too short to assess and evaluate the safety of the vaccine. And in Points below we identify the many defects, flaws and frauds in the Pfizer covid19 vaccine trial of 2020. No property safety studies have been conducted to measure all cause mortality over the short, medium and long term for these covid19 vaccines. Claiming that these vaccines were “safe and effective” was a lie and a fraud and amounted to getting informed consent by fraud and deception.

- 11.** There have been significant legal victories in the courts against the covid19 vaccinations and mandates and censorship and frauds. And new precedents have been set. The courts are defending the human rights, civil rights, legal rights, and Constitutional rights of the ordinary people. The opposition involve corrupt elements of the state or government and large corporations, and conflicts of interest.
- The US 5th Circuit court’s en banc decision last week to uphold the injunction against a COVID shot mandate for federal workers.

- The US Supreme Court's rejection of the Biden administration's mandate for companies with over 100 employees.
- The Supreme Court's rejection of CDC's authority to suspend housing evictions.
- The Florida district court's rejection of the mask mandate in interstate travel.
- Decisions in Missouri v. Biden revealing the truth about federal censorship.
- The "Twitter files" and the U.K. Telegraph Lockdown Files revealing the extraordinary level to which government decisions on COVID19 were arbitrary, impulsive, hysterical, political and completely untethered from science, and these documents are being used and will be used in court cases.
- CHD won a federal injunction against the D.C. Minor Consent Act, thanks to CHD attorney Rolf Hazlehurst.
- CHD won a state court decision, finding NYS' vaccine mandate for healthcare workers "null and void," thanks to attorney Sujata Gibson.
- CHD won an injunction against CA's new AB2098 law restricting physician speech regarding COVID, thanks to attorney Rick Jaffe.

Further Details of the Frauds Committed

12. The attempt by Pfizer and the FDA to keep important Pfizer trial data and internal documents locked up and hidden for 75 years, when these documents showed deaths and high risk of premature death and serious harms, illnesses and disabilities from this experimental covid19 vaccine. One Pfizer document released by court order is 9 pages long and shows over 1,200 deadly illnesses, diseases, disabilities, and types of deaths caused by this vaccine, and also showed that in the first 90 days of the vaccination of the general public there were 1,223 deaths and 42,000 people with serious injuries, illnesses and disabilities including 25,000 nervous system disorders, 8,800 respiratory disorders, 17,000 gastrointestinal disorders. Over 42,000 people suffered serious injuries, disabilities and illnesses caused by the vaccine within the first 90 days of the vaccine being given to the general public. This is horrific and should have led to a suspension of vaccinations pending a public investigation or an end to the vaccinations !

These are Exhibits 1 and 2.

The Irish government and health authorities and the regulator in Ireland and the EMA in Europe did NOT reveal these important facts to those people who got the covid19 vaccination in Ireland in 2021, 2022 and into 2023. And these facts are not being communicated to the parents and guardians of children in Ireland.

Furthermore, Pfizer and the FDA in the USA and the EMA in Europe did not disclose these specific risks of

death and serious illnesses and disabilities identified in the Pfizer report to the general public and to vaccine recipients in the USA and in the European Union. This was known from March 2021. Yet the defendants in this High Court case have relied on the EMA in their submissions to this court. Aa EMA which has proven itself to be defective, flawed and possibly fraudulent in respect of this Non Disclosure.

Pfizer and the FDA tried to cover up this vaccine trial data for 75 years but they were forced to release this data under federal court order in the USA in 2022. As the Pfizer covid19 vaccine trial is due to end in mid 2023, this post authorisation data is technically part of the Pfizer vaccine trial data.

The important point here for the High Court is that there was deliberate concealment of these serious risks and dangers associated with the covid19 vaccines by Pfizer, and by the European Medicines Agency and the Irish government and health authorities and Irish regulatory authorities. Yet they publicly claimed that the vaccine was safe and effective. The net effect of this is fraud and obtaining the informed consent of the Irish people by fraud and deception. This was detailed in our affidavit filed in the High Court in December 2022.

The serious illnesses, disabilities and premature deaths caused by these covid19 vaccines is corroborated in reports of vaccine injuries and deaths to government databases such as VAERS, MHRA, Eudravigilance, HPRA, etc. and over 1,200 published per reviewed scientific studies of adverse effects in the short term from the covid19 vaccines. All these show that the covid vaccines were unsafe and this has been documented in our affidavits filed in the High Court, our exhibits, and our books of evidence. All of this evidence was known to the Irish government and health authorities from mid 2021 onwards and yet they ignored it, dismissed it, denied it and fobbed off anybody who raised this issue with them. In such circumstances, to claim that the covid19 vaccines were safe was a lie, a fraud and a deception. This is another ground for fraud. This clearly led to the gaining of informed consent from people by fraud and deception., and this problem still exists today.

These illnesses, diseases and disabilities caused by the covid19 vaccine are dangerous and deadly to children. But Irish parents and guardians and children themselves were not told about this. The HSE, the chief medical officer, NPHET, NIAC, the department of health, and the government did not disclose this to vaccine recipients and the general public. All they told them was that the vaccines were safe and effective. This is very strong legal grounds for supporting the injunction to stop these covid19 vaccinations for children in Ireland. It also another ground for granting a Protective Costs Order, as this court case is most certainly a Public Interest court case. And it is another ground for pleading fraud in this court case, indeed this fraud has had devastating effect on many thousands of Irish people around Ireland in terms of injuries, illnesses, disabilities and deaths caused and loss of jobs, incomes, careers, families and homes.

Deliberate concealment of important and vital information for the purpose of obtaining informed consent for an experimental product by fraud and deception, and this leading to serious injuries, illnesses, disabilities and deaths and substantial financial losses for the vaccinated general public, and breaching their Constitutional rights and Natural Law right to bodily integrity and right to life in some cases and their international Human Rights is a very serious matter and the courts have historically taken a strong stance against such frauds and delivered strong and harsh judgments against those people involved in such frauds. We believe that this type of judgement and remedy needs to be applied in this High Court case.

13. To expand the previous point, I further say that the Pfizer internal documents released under Federal Court order in the USA in 2022 corroborate the evidence we have given in sworn affidavits and books of evidence to the High Court in this court case. The following has recently been revealed in these Pfizer documents :

- 300 reports of stroke within 41 days of covid19 vaccination
- 50% of strokes occurred in the first 48 hours
- All 300 reports were classified as "serious"
- One in five (61 of the 300) strokes was **fatal**, 32% did not resolve, 28% had an "unknown" outcome, and three suffered very rare deep brain clots (cerebral venous sinus thrombosis).

And what was Pfizer's conclusion? "This cumulative case review does not raise new safety issues."

Pfizer Ignored this horrific Stroke Safety Signal 90 Days After Vaccine Rollout in 2021. Both Pfizer and the FDA ignored this. And the EMA in Europe and Irish regulator who had access to these FDA documents and data also ignored these dangers and refused to inform the general public. This has been uncovered by a special team of investigators who are trawling through the Pfizer documents on a site online at

<https://campaigns.dailyclout.io/campaign/brand/cc3b3e5a-6536-4738-8ed6-5ee368c67240>

and

<https://dailyclout.io/groundbreaking-new-book-sends-shockwaves-through-pfizers-criminal-enterprise/>

The HPRA and NIAC in Ireland ignored these important facts while spouting "the vaccines are safe and effective" to the general public. They have proven themselves not interested in the scientific, medical and statistical facts and evidence and informing the general public. These covid19 vaccines are highly profitable for those people in positions of power and of dominance over others and this and conflicts of interest may be the deciding factor here.

I further state that the Pfizer internal documents which were supposed to be covered up and not released to the general public for 75 years but were released under federal court order in the USA in 2022 have been analysed by experts and put into a new book. This book titled 'Pfizer Documents Analysis Reports' is

a compilation of the types of serious illnesses, disabilities and deaths caused by this vaccine and identified in Pfizer's own internal documents and trial data. This is Exhibit 67 for this High Court case and there is a link to the book here at

<https://dailyclout.io/product/war-room-dailyclout-pfizer-documents-analysis-volunteers-reports/>

This book reveals that the covid19 vaccine is very dangerous to human health and can cause many types of serious illness or disability and premature deaths and this has serious implications for the USA, Ireland, Britain and many other highly vaccinated countries. And these Pfizer documents were filed with and known to the FDA in the USA and the EMA in Europe and the regulatory authorities in Ireland in 2020 and 2021 but they refused to inform the general public and refused to protect the general public. These facts became public after the US Federal Court ordered the mass release of these Pfizer documents from January 2022 onwards, yet the EMA and Irish government and health authorities chose to ignore them and not inform the general public and potential vaccine recipients. They parroted the term "safe and effective" continuously in such a way as to mislead the general public. This completely undermined informed decision making and informed consent. As already stated it amounted to obtaining informed consent for this vaccine by deception and fraud. This was and is a serious breach of the public trust and a breach of the Irish Constitution, the Natural Law, international Human Rights and Irish laws.

14. I further say that In Ireland, Britain and Europe the Pfizer covid19 vaccine has been and is being offered to children. I further say that in respect of **Exhibit 4c** referenced in the affidavit filed in the High Court in December 2022 provided statistical charts of data from the Office for National Statistics in Britain which showed that covid19 vaccinated children are dying at far higher rates than unvaccinated children. We need to quantify this and look at **All Cause Mortality for the vaccinated and unvaccinated**.
- For those who get their two does of the covid19 vaccine they are dying at over **15 times** the rate of unvaccinated children. This is all cause mortality.
 - For those who are triple vaccinated they are dying at over **45 times** the rate of unvaccinated children. This is all cause mortality. And they are **120 times** more likely to die of covid19.

Other Data from the Office for National Statistics in Britain up to march 31st 2022, shows that fully covid vaccinated children are dying at **80 times** the rate of unvaccinated children. This is all cause mortality. And they are **300 times** more likely to die of covid19. The same Pfizer covid19 vaccine is being used in Ireland and Britain for children. **These statistics are presented in Exhibit 66 for the court.**

Source:

<https://web.archive.org/web/20220524192354/https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/datasets/deathsbyvaccinationstatusengland>

and

<https://www.ons.gov.uk/file?uri=%2fpeoplepopulationandcommunity%2fbirthsdeathsandmarriages%2fdatasets%2fdeathsbyvaccinationstatusengland%2fdeathsoccurringbetween1january2021and31march2022/referencetable20220516accessible.xlsx>

and some statistical analysis of the data on

<https://expose-news.com/2022/05/20/kids-death-risk-increases-8100percent-covid-vaccination/>

This is mass killing of children. This is illegal, unlawful, unethical and unConstitutional both in Britain and in Ireland. Parents and guardians should have been told about this but were not told. This is not full and valid informed consent. This is the illegal gaining of informed consent through fraud and deception. I ask the High Court to act immediately and decisively on this.

15. I further say that on the topic of “Information is Power”, it is equally true that concealment of information and Non Disclosure of information disempowers the people, and places their lives at serious risk of injury, illness, disability or death from vaccines. On this very point, an official EU Safety Report on the Pfizer mRNA vaccine reveals damning data and corroborates our evidence that the covid19 vaccines are not safe and have caused a high number of injuries, illnesses, disabilities and deaths. Many illnesses and disabilities caused by the covid19 vaccine were identified in the Pfizer trial and also in the post authorisation period. This EU Report was kept secret and hidden from the general public. It was only released via an FOIA request and then provided to the public by an anonymous person, being provided to the Austrian science and political blog, TKP.

The following is an overview of the total number of cases - post-marketing and clinical trial data - of the 6 month reporting period:

- 327,827 case reports (individuals) containing 1,172,887 events (adverse events)
- Three times more cases reported for women than for men
- Highest number of reported cases in the 31-50 age group
- A third of all case reports were classified as serious
- 44% of case reports were classified with outcomes as either unknown or unresolved
- 84% of case reports had no history of comorbidities
- 5115 deaths occurred after vaccine was administered
- 46% of fatal outcome cases occurred in those without any comorbidities

22 people under 17 died, and had no underlying illnesses. Out of 26 pregnancy cases in the trial, 15 ended in miscarriages and 5 resulted in live births with birth defects.

A link to this EU Safety report is provided below and the report and video testimony of the person who got the report are on a dvd marked **Exhibit 92 for the High Court.**

This important information was hidden from the public and kept secret and NOT provided by the EU authorities, the EMA and the Irish government and health authorities to the general public and to people who got covid19 vaccinations. There was NO full and valid informed consent for these vaccinations.

Link to Report: https://tkp.at/wp-content/uploads/2023/01/1.PSUR_organic.pdf

Sources: <https://soniaelijah.substack.com/p/eu-safety-report-on-pfizer-biontech>

News report: <https://childrenshealthdefense.eu/eu-issues/emas-failure-to-pull-covid-19-jabs-even-though-risk-benefit-balance-nullified/>

and <https://twitter.com/i/status/1627446876671811584>

This is another ground for fraud we are adding to the existing grounds for fraud.

16. Medicare data in the USA conclusively proves that the covid19 vaccines increase a persons' risk of dying.

The data for this is irrefutable as it is from Medicare, which is run by the US government and is one of the biggest data gathering organizations in the world. This Medicare data was deliberately concealed from the general public in the USA and hidden from medical doctors and scientists, and was kept hidden and secret until February 2023. This Medicare data was supplied to Mr. Steve Kirsch in the USA, and he has put this information up on his web page and also provided statistical analysis of this data. This proves that the covid19 vaccines cause premature deaths and that the vaccines are unsafe and ineffective.

Source: <https://stevekirsch.substack.com/p/game-over-medicare-data-shows-the>

and the Medicare data is at <https://www.skirsch.com/covid/Medicare-2-1-23.xlsx>

and statistical analysis of this data at <https://stevekirsch.substack.com/p/game-over-medicare-data-shows-the> and

<https://public.tableau.com/app/profile/alberto.benavidez/viz/KirschsMedicareDataGameOver/Home>

Both Dr. Clare Craig and Professor Norman Fenton have had a look at the Medicare data and were unable to find any obvious flaws.

The NIH and CDC had access to this information since mid 2021 and they lied to the American people about the safety of covid19 vaccines and boosters. They had access to this data the entire time and kept it hidden and said nothing. The EMA in Europe and the HPRA, NIAC and Irish government used these same lies to lie to the Irish public and deceive them. The whole covid19 vaccination program has been based on lies, fraud and deception. This is another ground for fraud we are adding to the existing grounds for fraud.

This Medicare data is Exhibit 100 for the High Court

17. The Irish government and health authorities did not provide and refused to provide the Irish public and those people who got covid19 vaccinations and boosters with this VAERS data, Eudravigilance data,

MHRA data, DMED data, Medicare data, and data from the EU authorities and other countries, and documents from Pfizer and other covid19 vaccine companies showing the high number of injuries, serious illnesses, disabilities and deaths caused by the covid19 vaccines, and the massive increase in these harms and deaths when compared to other vaccines in previous years and decades. The evidence here is vast, and has been available since mid 2021 and clearly showed that these vaccines were not safe but this was deliberately concealed and hidden from the general public. The Irish government and health authorities repeated the mantra “safe and effective” all of the time and censored any news or data which contradicted that. This was and is the use of fraud and deception to get informed consent.

I further say that on the subject of concealment of information which can prevent the obtaining of full and valid informed consent for vaccines. There are over 1,000 peer reviewed published scientific studies showing the injuries, illnesses, disabilities and types of deaths caused by covid19 vaccines and boosters.

This is Exhibit 97 for the court.

The High Court should also note that the Irish government and health authorities refused and still refuse to give this information to the general public and to the covid vaccinated. Thus full and valid informed consent for these vaccines was not given. And today this has resulted in many thousands of Irish people suffering illnesses or disabilities from these vaccines and many thousands have died and pushed up the high excess mortality figures for 2022 and into 2023.

Source: <https://community.covidvaccineinjuries.com/compilation-peer-reviewed-medical-papers-of-covid-vaccine-injuries/>

The massive rise in vaccine injuries, illnesses, disabilities and deaths caused by the covid19 vaccines and registered on government databases worldwide including VAERS, V-Safe, DMED, Eudravigilance, MHRA and others is detailed in the affidavits and exhibits we filed in the High Court since November 2022 and in our books of evidence proves that these covid19 vaccines are NOT safe. Yet these numbers are less than one tenth of the actual injuries, illnesses, disabilities and deaths according to scientific studies. So the real numbers are ten times worse ! In comparison to other vaccines and similar population numbers vaccinated in the past, the covid19 vaccines have been the deadliest in the last 50 years, and have had more illnesses, disabilities and deaths than other vaccines combined together over the last 30 years according to VAERS and other government databases. The Irish government and health authorities did not reveal these facts to the Irish people and those people who got vaccinated.

For example, in the USA the DMED data for the US military is shocking showing a massive increase in vaccine injuries, serious illnesses, disabilities and deaths caused by covid19 vaccines to young, fit, strong and healthy US military personnel in 2021 and 2022. This has caused a massive national security problem for the USA. A US Senator Ron Johnson sent an important letter about this to the US Secretary of Defense

demanding information on shockingly high COVID-19 vaccine injury among military personnel

You can read the letter here at this link :

<https://www.ronjohnson.senate.gov/services/files/FB6DDD42-4755-4FDC-BEE9-50E402911E02>

Senator Ron Johnson's letter confirmed lawyer Thomas Renz's presentation to the US Senate earlier. The Senator set a deadline for Secretary Austin to provide information regarding vaccine injury among military personnel until February 15, 2022. I quote from this letter:

"Based on data from the Defense Medical Epidemiology Database (DMED), Renz reported that these whistleblowers found a significant increase in registered diagnoses on DMED for miscarriages, cancer, and many other medical conditions in 2021 compared to a five-year average from 2016-2020.² For example, at the roundtable Renz stated that registered diagnoses for neurological issues increased 10 times from a five-year average of 82,000 to 863,000 in 2021," Sen. Johnson wrote.

Senator Johnson included in his letter the following medical conditions presented by Renz:

Hypertension – 2,181% increase

Diseases of the nervous system – 1,048% increase

Malignant neoplasms of esophagus – 894% increase

Multiple sclerosis – 680% increase

Malignant neoplasms of digestive organs – 624% increase

Guillain-Barre syndrome – 551% increase

Breast cancer – 487% increase

Demyelinating – 487% increase

Malignant neoplasms of thyroid and other endocrine glands – 474% increase

Female infertility – 472% increase

Pulmonary embolism – 468% increase

Migraines – 452% increase

Ovarian dysfunction – 437% increase

Testicular cancer – 369% increase

Tachycardia – 302% increase

These are stunning numbers.

At the end of his letter, Senator Johnson Secretary Austin the following questions:

Is DoD aware of increases in registered diagnoses of miscarriages, cancer, or other medical conditions in DMED in 2021 compared to a five-year average from 2016-2020? If so, please explain what actions DoD has taken to investigate the root cause for the increases in these diagnoses.

Have registered diagnoses of myocarditis in DMED been removed from the database from January 2021 to December 2021? If so, please explain why and when this information was removed and identify who removed it.

At an earlier US Senate hearing, several world-renowned doctors, scientists and medical experts spoke during a panel discussion titled “Covid-19: A Second Opinion” in Washington DC on January 24, 2022, which was hosted by Senator Ron Johnson (R-WI). During the event, Ohio attorney Thomas Renz presented DOD medical billing data from the Defense Medical Epidemiology Database (DMED). Renz exposed the disturbing truth about what is happening to the health of our service members since the rollout of the jab a year ago. According to Renz, there was an astronomical increase in several serious illnesses and disorder diagnoses in the US military since the rushed rollout of the Covid-19 vaccine.

The whistleblowers came forward because of what they were seeing on the job as they treated military personnel, leading them to investigate the DMED system for anomalies related to the increase they had seen in their clinical experience, Renz said during the discussion. A video of this is available on <https://rumble.com/embed/vqwbca/?pub=4>

You can read the US Senators letter here at

<https://www.ronjohnson.senate.gov/services/files/FB6DDD42-4755-4FDC-BEE9-50E402911E02>

In Autumn 2022, due to pressure from Senator Johnson and others, the US military ended the mandate for covid19 vaccinations. And several elected representatives across political parties in the US Congress are investigating the non disclosures and frauds associated with these covid19 vaccines and the massive number of injuries, serious illnesses and deaths caused by these vaccines.

Over 1,000 published and peer reviewed scientific studies are showing and continue to show a massive rise in serious illness, disabilities and premature deaths associated with covid19 vaccinations and boosters and a strong link between the sudden development of several deadly illnesses and premature deaths or “sudden deaths” and excess mortality on one side and covid19 vaccinations on the other side. The link is strong and is being proven by more and more evidence. And many published scientific reports signed by thousands of top scientists, medical doctors, pathologists, medical professionals and professors from around the world confirm this. We have provided all of this in our affidavits, exhibits and books of evidence for this High Court case.

The Irish government and health authorities did not reveal these facts to the Irish people and those people who got vaccinated in 2021 and 2022 and into 2023. And they did not reveal these facts as they became known in 2021 and 2022 and into 2023. By facts I mean the data from VAERS, V-Safe, DMED, MHRA and Eudravigilance and others showing a high number of injuries, serious illnesses, disabilities and

deaths caused by these vaccines to those people who got the covid19 vaccines. They parroted the words “safe and effective” for these vaccines continuously in the press and media and in medical leaflets but refused to tell the Irish public about the risks and dangers. This in itself was fraud and they used fraud and deception to get the informed consent of people for these vaccines in Ireland. This has had devastating consequences for many people around Ireland in terms of vaccine injuries, serious illnesses, disabilities and premature deaths. We will present vaccine injured people to the High Court to testify about this.

18. I further say that accurate statistics to measure the safety and effectiveness of the covid19 vaccines have not been provided in Ireland due to failures of the CSO, the GRO, the HPRA, the HSE and Department of Health to gather and store and publicly publish accurate, up to date statistics of

- deaths
- causes of deaths including autopsies of dead covid19 vaccinated people
- illnesses and disabilities
- hospitalizations

for vaccinated persons and for unvaccinated persons, and make a distinction between the two groups, from Quarter 1 2021 onwards to the present day. This has been complicated by failures of Coroners to investigate and carry out autopsies of deaths caused by the covid19 vaccines in Ireland. This point is addressed in a separate point below. These are more example of Non Disclosure which have prevented full and valid informed consent. The effect of all of this is that the effectiveness and safety of the covid19 vaccines was not and is not being properly monitored and any statements claiming they are “safe and effective” amounts to deception and fraud.

I further say that the failure of the HSE, the Department of Health and the CSO to gather and provide accurate, timely and up to date statistics of deaths, illnesses and disabilities and hospitalizations for the covid19 vaccinated and the unvaccinated to the general public and on their web sites so that vaccine safety and effectiveness can be independently assessed and verified by the general public including parents and guardians means that the HSE and the Department of Health and government are totally discredited, not fit for purpose and their claims about vaccine safety and effectiveness are unproven, false, misleading and fraudulent. And this fraud has caused losses to the general public in terms of deprivation of full and valid informed consent for the vaccinations, and of vaccine injuries, illnesses, disabilities and premature deaths and loss of jobs, careers, homes, families and considerable financial losses.

The attitude and policies of the HSE, NPHET, the Minister for Health and Department of Health and the government is to totally ignore the big increase in excess mortality in Ireland since mid 2021 and 2022

and into 2023, and ignore its relationship to the vaccine deaths, injuries, illnesses and disabilities which are placing additional burdens and pressures on the over-burdened healthcare system, leading to more over-crowded hospitals in 2022 and 2023 and covid19 ; the worst in history. They falsely claim that this crisis is mild, temporary, coincidental, a random event, doesn't really matter, is due to "lack of resources" while resources in the form of many billions of euros were wasted on ineffective covid19 measures and on unsafe and ineffective covid19 vaccines while they blocked and banned cheap, safe and effective medicines for covid19 in 2020 and 2021. They hope that the problem they created will "go away". But excess deaths are not going away and over-crowded hospitals are not going away and vaccine injuries, illnesses, disabilities and deaths are not going away.

Their Disclosure in this court case in terms of folders and documents proves this to be the case. Courts and governments have a legal duty of care to the Irish people and Nation and they should not ignore and dismiss the big increase in excess mortality in Ireland and other highly covid vaccinated countries which is related to covid19 vaccine deaths, injuries, illnesses and disabilities which are placing massive, new, additional burdens and pressures on the over-burdened healthcare system leading to more and more over-crowded hospitals in 2022 and 2023 ; the worst health crisis in history. Their breaching of informed consent during mass covid19 vaccinations is having devastating effects on Ireland and created a national crisis. Here again, we see the central role played by deprivation of informed consent which is the subject of this High Court case

19. Deeper analysis of the deprivation of voluntary informed consent

Voluntary informed consent prior to vaccination must be obtained by the person administering the vaccine. This person is required by their professional ethical codes and HSE guidelines and Irish and EU laws to clearly explain the risks and benefits of the vaccination in plain language and understandable terms. It is a fact, and evidence is provided of this fact, that critical safety information was being purposely withheld from healthcare professionals administering the covid vaccine. This makes the voluntary informed consent of the patient impossible. All qualified health care professionals through their training knew or ought to have known, that the vaccines were experimental, in Phase 3 studies and that Phase 3 trials of properly developed medicines, those developed over several years rather than the 6 months with the covid vaccines, have a failure rate of almost 50%. A medicine fails in clinical trials if the evidence shows that it does not have a favourable risk:benefit profile. In essence they were knowingly gambling with their patients lives. They also knew that covid presented an extremely small risk or no risk to children and young healthy people and the vaccines were an unknown danger. The dangers of the vaccines are now apparent, and we present huge volumes of evidence proving this.

Not one single Irish person administered these vaccines was provided with the necessary information to

make an informed decision. We still don't even know what exactly is in these injections, nor do the health care professionals administering them. If they were life saving as erroneously claimed by some people, they should have demonstrated this in randomised controlled trials - the trial data shows no evidence of any lives saved. And these trials are fraudulent because they removed the control groups, an unprecedented step in medical history. Other high profile examples of fraud are presented in our evidence.

The net effect of this is the gaining of informed consent for these vaccines by fraud and deception.

I further say that I wish to add further to Point 23 on page 70 of the affidavit filed in December 2022, regarding the issue of deprivation of Informed Consent. Voluntary informed consent was NOT and could NOT be obtained in the face of unConstitutional governmental coercion via medical apartheid laws and vaccine passports and the removal of fundamental, constitutional human rights such as the right to bodily autonomy, the freedom to choose to refuse medical treatments and the freedom to travel and socialise without submitting to dangerous medical experimentation.

And the HSE, NIAC, HPRA and Department of Health giving false assurances of vaccine / booster safety in the total absence of any medium to long term safety data was a fraud which led to the obtaining of informed consent by fraud and deception. Information was purposely being withheld from these Healthcare Personnel (HCPs), information which was known to regulators, including the HPRA and EMA, the vaccine manufacturers and the HSE. The released Pfizer documents include important safety data concerning the experimental vaccines that was reported to the manufacturers by our own HPRA, inclusive of suspected deaths and failed pregnancies.

These frauds were used to illegally and unlawfully deprive Irish people of their Constitutional rights, civil rights and human rights.

Further grounds showing how people were deprived of full and valid informed consent for the covid19 vaccines is provided in the first Book of Authorities partially read to the court on March 10th 2023 and also included in our sworn affidavits filed in the High Court in December 2022 and January 2023.

20. Pfizer covid19 vaccine trial of 2020 and the frauds involved

Many scientists and medical professionals have identified many scientific flaws and defects and frauds in the Pfizer covid19 vaccine trial itself, and this was detailed in **Point 8 in our December 2022 affidavit** filed in the High Court which render the trial itself and its findings defective, flawed and fraudulent, and render all claims about vaccine safety and effectiveness defective, flawed and fraudulent. This was NOT communicated to the general public and to vaccine recipients. This was deliberately concealed from the general public, while false allegations about vaccine safety and effectiveness were spread everywhere.

I further say that research by Ed Dowd a former data analyst for Blackrock shows that during the Pfizer covid19 trial in 2020, the excess mortality for covid19 vaccinated people was much higher than that for unvaccinated people. Normally, during the drug approval process this would be grounds for NOT approving the vaccine or medical product. This is another example of fraud.

Source: <https://takecontrol.substack.com/p/dangerous-pfizer-vaccine-fraud-exposed>

and https://rumble.com/vv1adx-breaking-exclusive-former-blackrock-portfolio-manager-exposes-pfizer-fraud.html?utm_source=pocket_mylist

and <https://childrenshealthdefense.org/defender/cause-unknown-edward-dowd-sudden-deaths-covid-vaccines/>

The Irish government and health authorities have repeated these same false allegations in promoting Pfizer covid19 vaccines. This is of huge importance. I cite the legal principle which applies in this court case - **‘Falsus in uno, Falsus in omnibus’** which is a Latin and legal term meaning "false in one thing, false in everything." This means fraud and it also means that the scientific reports and studies and the affidavits of experts delivered by the defendants to us and to the High court rely on this fraud and cite this fraud and are tainted by this fraud and are based on fraud and are inadmissible in this court and other courts. Courts and tribunals are not to be undermined and brought into disrepute by fraud. The net effect of this is fraud and obtaining the informed consent of people by fraud and deception.

21. More evidence about the Pfizer covid19 vaccine trial of 2020

I further say that more evidence of defects, flaws and fraud in the Pfizer covid19 vaccine trial have emerged. A top German newspaper named ‘Welt’ published a report which uncovers evidence of serious irregularities in the Pfizer phase 3 Comirnaty trial, suggesting systematic attempts to cover up adverse events at the Argentine clinical site. The article explains that Pfizer unblinded and removed numerous patients who suffered adverse events from the covid vaccine trial. It also gives examples of Pfizer subjects whose deaths appear to have been covered up.

Source: <https://www.welt.de/politik/deutschland/plus243820767/Corona-Impfstoff-Die-vielen-Ungereimtheiten-bei-der-Pfizer-Zulassungsstudie.html>

and <https://www.eugypius.com/p/welt-report-uncovers-evidence-of>

and <https://dailysceptic.org/2023/02/18/pfizer-vaccine-trial-fraud-charges-set-out-in-mainstream-press-for-first-time/> and <http://igor.chudov.com/tmp/Die-Welt.pdf>

More reports from the German newspaper Welt confirm this

- Numerous subjects who suffered adverse events, including deaths, during Pfizer’s COVID-19 shot trials were removed from the trial data.

- A person known as “Pfizer subject C4591001 1162 11621327” died three days after receiving the second dose of Pfizer’s COVID-19 shot, reportedly due to stroke and arteriosclerosis; it was deemed unrelated to the shots.
- Die Welt also revealed contradictions in Pfizer documents, adverse events from the shot downplayed and mass unblinding of study subjects, which wasn’t revealed in a later approval study.
- In November 2020, Pfizer claimed their COVID-19 shot was 95% effective against COVID-19, but this was highly misleading and based on flawed methodology, including excluding people who got COVID-19 within 14 days after their first shot.

Sources: <https://archive.is/m3snl#selection-3651.0-3651.58>

and <https://www.worldtribune.com/pfizer-vaccine-trial-fraud-reported-by-mainstream-german-press/>

and <https://childrenshealthdefense.org/defender/pfizer-covid-vaccine-trial-failures-cola/>

Pfizers internal documents released under Federal Court order in the USA showed that a large number of vaccinated people got seriously ill, disabled, or died during the trial but this was not recorded as due to the vaccination. Most of these illnesses and deaths involved the cardiovascular system, clotting and circulatory disorders. Many were forced to withdraw from the vaccine trial. None of this was communicated to the general public by the regulatory authorities and governments and health authorities.

Sources: https://phmpt.org/wp-content/uploads/2022/06/125742_S1_M5_5351_c4591001-fa-interim-adverse-events.pdf

and https://phmpt.org/wp-content/uploads/2022/06//125742_S1_M5_5351_c4591001-fa-interim-discontinued-patients.pdf

and <https://phmpt.org/wp-content/uploads/2022/06/STN-125742-0-0-Section-2.5-Clinical-Overview-reissue.pdf>

and news report at <https://childrenshealthdefense.org/defender/pfizer-covid-vaccine-trials-adverse-events-shots-fda-eua-documents/>

Steve Kirsch a statistician based in the USA described more fraud in the Pfizer covid19 vaccine trial, specifically at Pfizer Sites 1231 and 4444.

<https://rumble.com/v1445tq-pfizer-fraud-sites-1231-and-4444-16-minutes.html>

All of the above further corroborates our finding of fraud, and is another ground for fraud.

I further say that in March 2023 more evidence of frauds in the Pfizer covid19 vaccine trial of 2020 have emerged and been published in the press and media. Die Welt, a mainstream media outlet in Germany,

revealed that Pfizer covered up serious covid19 vaccine trial failures including the following

I further say that more corroborating evidence exists from the founders of BioNTech who produced the covid19 vaccine for Pfizer, CEO Ugur Sahin and CMO Özlem Türeci, in their new book *'The Vaccine: Inside the Race to Conquer the COVID-19 Pandemic'* who say they skipped important categories of preclinical testing, i.e. testing on animals, in order to move on to the clinical, i.e. human, trials. They skipped full safety tests for the vaccine which normally take a few years and they waived major categories of safety testing for their product which regulators normally require. This book is an auto-hagiographical account of their efforts to develop a covid-19 vaccine that they co-authored with the journalist Joe Miller.

BioNTech launched its own project to develop a covid-19 vaccine, dubbed "Project Lightspeed," already in late January 2020 – less than a month after the first Covid-19 cases had been reported in Wuhan and before the outbreak had even been designated a pandemic by the WHO. Somehow, it had prior knowledge of the global need for such vaccines long before everybody else.

Sasha Latypova, a former executive of a pharmaceutical Contract Research Organisation, reviewed Pfizer vaccine trial documents released under FOI to Judicial Watch for a second time this year and agreed that proper safety tests had not been carried out on this vaccine. In submissions to FDA, several categories of preclinical testing were simply omitted altogether. These include so-called safety pharmacology studies, which, per 2005 WHO guidelines, are intended to investigate the effects of a candidate vaccine on "physiological functions (e.g. central nervous system, respiratory, cardiovascular and renal functions) other than those of the immune system." The same guidelines are also cited by the European Medicines Agency in its February 2021 Comirnaty assessment report, where it notes that "No safety pharmacology studies were conducted with BNT162b2.

I quote Sasha:

' Finding 1: Pfizer's program did not include a comprehensive end-to-end test of all components as well as the final chemical entity of the mRNA product. The studies included in the FDA approval package were for a variety of versions of the product with no comparability assessments, thus no comprehensive assessment of the product safety can be made.

Finding 2: The toxicity/safety pharmacology of the Covid 19 vaccine's active ingredient (mRNA BNT162b2) was never evaluated!

Finding 3: Pfizer claimed absence of potential for "vaccine-elicited disease enhancement" based on studies of an animals that did not get sick from Sars-Cov-2.

Finding 4: CDC, FDA and Pfizer lied about "vaccine staying in the injection site" - the injected substance is carried by the LNPs all over the body and into all organs.

Finding 5: Pfizer waived major categories of safety testing for their product altogether using self-serving interpretation of WHO recommendations from 2005.

Finding 6: Both FDA and Pfizer knew about major toxicities associated with gene therapy class of medicines, and therefore cannot claim lack of anticipatory knowledge of these risks. '

'The cursory nature of the entire preclinical program for mRNA injections conducted by Pfizer can be briefly summarized as "we did not find any safety signals because we did not look for them". The omissions of standard safety studies and glaring scientific dishonesty in the studies that were performed are so obvious that they cannot be attributed to the incompetence of the manufacturers and regulators. Rather, the questions of fraud and willful negligence should be raised.'

Source: <https://sashalatypova.substack.com/p/did-pfizer-perform-safety-testing>

Documents: <https://www.judicialwatch.org/documents/jw-v-hhs-fda-pfizer-biontech-vaccine-prod-3-02418/>

The Pfizer covid19 vaccines could not and cannot be deemed to be "safe" as safety was never fully established in the trials. Those people and government and health authorities who publicly claimed these vaccines were "safe" deliberately misled the general public and are guilty of fraud.

None of this was revealed to the general public and those people who got vaccinated. Lies and frauds based on these lies have caused great damage and loss to many people worldwide including in Ireland. I add this as another ground for fraud to our pleading for fraud.

22. Coroners and Autopsies

All Coroners around Ireland were informed about the German Pathology findings dealing with covid19 vaccine caused deaths in Spring 2022. So far, no Coroner in Ireland has carried out a full autopsy on deaths caused by the covid19 vaccines. None have used the German Pathology findings. We have evidence and witnesses that the Coroners are refusing to carry out autopsies into deaths caused by the covid19 vaccines. This was referenced in an affidavit we filed in the High Court. For example, Sharon Browne is a Plaintiff in this High Court case and the Coroner in Limerick has refused to carry out an autopsy on her mother who was killed by the Pfizer covid19 vaccine. Something is blocking, stopping or preventing Coroners in Ireland from carrying out autopsies into covid19 vaccine caused deaths. This is leading to fraud in relation to 'causes of death' on death certificates as there is a refusal to establish the role of the covid19 vaccines in deaths. This is particularly important as there has been a massive rise in excess mortality in Ireland from mid 2021 onwards to the present in 2023 which corresponds to the roll out of mass covid19 vaccinations and boosters. The rise in sudden deaths particularly of young people under the age of 50 has been particularly bad in Ireland and other highly vaccinated countries.

There is a duty on Coroners to gather accurate Coroner and Autopsy data for dead vaccinated and

unvaccinated people as outlined in Points 17a and 17b in our affidavit filed with the court in January 2023. And provide these statistics to the general public on the Internet and on other media. This failure by them has made it impossible to assess the safety and effectiveness of the covid19 vaccines and this means that all claims stating that the vaccines are safe and effective are unproven and fraudulent. And this has completely undermined informed consent for those persons who received the vaccines and boosters.

Something is blocking, stopping or preventing Coroners in Ireland from carrying out autopsies into covid19 vaccine caused deaths. This is a particularly insidious fraud designed to conceal and hide evidence and create a false narrative and a false impression for the general public.

A recent case in Italy reinforces this point for the High Court. In Italy a well known medical doctor Dr. Valerio Petterle in Treviso was suspended for two months after calling for autopsies for the high number of young and middle aged people who were dying of "sudden deaths". Italy has suffered a big rise in excess mortality after covid19 vaccinations began in 2021, which has continued up to the present. The Italian medical authorities have suspended him so as to intimidate and blackmail medical doctors into silence and not mention the big rise in excess mortality and the need for autopsies.

23. Fraud in the Manufacturing of the vaccines

I say that more evidence of crimes and criminality has emerged in recent weeks, including serious fraud which has been found by Alexandra Latypova and she presented her findings at an international scientific conference in Sweden in January 2023. She found evidence of fraud in the manufacturing processes and contracts for the covid19 vaccines, including massive variations between batches of covid19 vaccines which placed many people's lives in danger, no adequate safety testing of the vaccine, very poor product quality, no adequate quality control, and non compliance with good manufacturing practise and no regulation and no oversight by Regulatory authorities. This led to the manufacture of defective and unsafe vaccine products which placed the lives of many people in danger, yet these vaccine products were falsely and fraudulently presented as being "safe and effective" to the general public by the vaccine companies and by government, health and regulatory authorities in Ireland and elsewhere. And to compound this fraud, there was misuse of the US Department of Defence contracting mechanisms and the Emergency Use Authorization to commit this fraud and conceal it from the public. A fraud which has caused massive losses to many people, both in financial terms and human life terms, in many countries including Ireland. There are serious breaches of Irish laws, EU laws, UN laws, international treaties and the Nuremberg Code here which render the covid19 vaccines and whole vaccine programme a fraud and a criminal enterprise.

Video of lecture by Alexandra Latypova

<https://rumble.com/v288r8t-covid-19-countermeasures-evidence-for-an-intent-to-harm-clip.html>

International scientific and medical conference in Stockholm on 21-22 January 2023 gathered 15 leading doctors, researchers and lawyers from the US, Canada, UK, Germany, France, Belgium, Switzerland, Israel, Ukraine and Norway, and Sweden - <https://lakaruppropet.se/international-conference-pandemic-strategies/>

Alexandra Latypova provides more evidence of this including links to official government documents at <https://sashalatypova.substack.com/p/reviewing-the-dod-contracts-for-covid> and <https://substack.com/profile/50868935-sasha-latypova>

Involvement of the US Department of Defence with Covid19 vaccine makers and US government covid19 vaccine policies which point to fears of a Bioweapons threat or a simulation of one.

Contracts: <https://www.keionline.org/covid-contracts>

News reports: <https://www.bitchute.com/video/8ftbShzrkjI9/> and <https://bailiwicknews.substack.com/p/covid-19-injectable-bioweapons-as> and <https://bailiwicknews.substack.com/archive?sort=new>

These same frauds were also identified by Katherine Watt and she provided a public lecture about this online at <https://www.bitchute.com/video/8ftbShzrkjI9/>

and legal and historical information about this at:

<https://bailiwicknews.substack.com/p/american-domestic-bioterrorism-program>

and <https://bailiwicknews.substack.com/p/repost-biotech-idolatry-dod-pfizer>

and <https://substack.com/profile/8540123-katherine-watt>

and <https://bailiwicknews.substack.com/p/notice-of-war-crimes-to-health-care>

and news report in 2023

<https://childrenshealthdefense.org/defender/military-covid-vaccines-rfk-jr-podcast/>

I say that Fraud is being pleaded here in this court case and this is an additional ground for fraud.

A further count of Fraud is to be added to the existing grounds for Fraud in the affidavits filed in December 2022 and January 2023.

24. Causality

In terms of proving Causality meaning how the covid19 vaccinations caused and are causing deaths and a big rise in excess mortality in highly vaccinated countries, we have **Exhibit 150** for the court titled 'Grounds for Causality'. These grounds have been included in previous affidavits filed in the High Court. This exhibit or document uses the Bradford Hill criteria which have been used by scientists, medical doctors, pathologists, forensic teams and others around the world to establish and prove causality for several decades. These criteria are accepted internationally as being best practise for establishing and

proving causality.

This proof of Causality clearly exposes the fraud claiming that the covid19 vaccines are safe.

- 25.** The evidence shows that it is the “Experts” who lied, misled, deceived and peddled the covid19 lies and frauds for the last 3 years. This has been exposed in 2023 and I cite a newspaper article in the New York Post by a leading American medical doctor and surgeon, Dr. Marty Makary from Johns Hopkins University in the USA. He describes 10 lies or misinformation provided by the experts to the government and to the public in the USA and in other countries, including Ireland.

Misinformation #1: Natural immunity offers little protection compared to vaccinated immunity

Misinformation #2: Masks prevent COVID transmission

Misinformation #3: School closures reduce COVID transmission

Misinformation #4: Myocarditis from the vaccine is less common than from the infection

Misinformation #5: Young people benefit from a vaccine booster

Misinformation #6: Vaccine mandates increased vaccination rates

Misinformation #7: COVID originating from the Wuhan lab is a conspiracy theory

Misinformation #8: It was important to get the second vaccine dose three or four weeks after the first dose

Misinformation #9: Data on the bivalent vaccine is ‘crystal clear’

Misinformation #10: One in five people get long COVID

These lies and misinformation and frauds determined government policies, laws and regulations from 2020 to the present in 2023. And many “Experts” are continuing to engage in this.

Source: New York Post, February 27, 2023

<https://nypost.com/2023/02/27/10-myths-told-by-covid-experts-now-debunked/>

I further say that in addition to Non Disclosure and concealment of important information about these vaccines, that lies and liars have dominated the covid19 narrative and the promotion of covid19 vaccines in several countries. Lies from Tony Fauci of NIH, Rochelle Walensky of CDC, US President Joe Biden, the CEO’s of Pfizer, Moderna, Jansen, and Astrazeneca, Bill Gates of the WHO, Tedross the head of the WHO, the leaders of the EMA in Europe and the Irish government and Health authorities stated that:

(i) covid19 vaccines were safe and effective

(ii) prevented transmission

(iii) they introduced vaccine passports on the grounds that covid19 vaccination prevented transmission of

the virus. And they used these vaccine passports to discriminate against the unvaccinated in Ireland and other countries.

The scientific, medical and statistical evidence from around the world show these to be lies and a fraud. And these liars are continuing to lie today and now some of them are denying what they said in the past. They realize they lied in the past and they are now trying to deny this or water it down or mitigate it. I provide one small sample below of the lies told by prominent people and these lies formed government policies and laws in Ireland and many other countries.



and this was reported in New York Times at <https://www.nytimes.com/2021/04/01/health/coronavirus-vaccine-walensky.html> and <https://nymag.com/intelligencer/2021/04/cdc-data-suggests-vaccinated-dont-carry-cant-spread-virus.html>

and in Fortune at <https://fortune.com/2021/04/01/its-official-vaccinated-people-dont-transmit-covid-19/>

But, several months later on live television Walensky claimed the covid19 vaccines do not prevent transmission and vaccinated people are getting infected with covid19 and the vaccines are proving to be ineffective

<https://twitter.com/i/status/1480295777213857799>

and <https://www.shtfplan.com/headline-news/cdc-director-what-vaccines-cant-do-anymore-is-prevent-transmission>

and <https://www.naturalnews.com/2022-09-16-walensky-cdc-spread-misinformation-covid-vaccine-safety.html>

A litany of lies <https://infonomena.substack.com/p/the-myocarditis-iceberg>

I further say that on the subject of non Disclosure of information and outright lying in relation to covid19 vaccines and vaccinations, that Mr. Tony Fauci of the NIH has been found to be a liar and a deceiver in relation to his statements about covid19 vaccines and boosters over the past 2 years (since January 2021) and this adversely influenced the Irish government and health authorities and the EMA in Europe and European Health authorities as they relied on Tony Fauci and the NIH in the USA for guidance, advice and direction. Mr. Tony Fauci the head of the NIH in the USA for over 30 years has recently contradicted everything he stood for since 2021, he admitted in a published scientific paper that the covid19 vaccines did not work, were ineffective, and could not have been reasonably expected to get the pandemic under control.

He also admitted that the flu vaccines and vaccines for respiratory viruses in general are ineffective. He humbly admitted that scientists and doctors do not understand many aspects of human immunity and how and why respiratory viruses mutate rapidly and evade both human immunity and vaccines and why vaccines for respiratory viruses failed. Such humility and meekness would be very welcome from Irish medical doctors, scientists, the Medical Council, NIAC NPHET and the CMO. This completely contradicted what Tony Fauci publicly stated on television, radio and in newspapers and social media in 2021 and 2022 when he publicly claimed that the covid19 vaccines worked and prevented infection, and stopped viral transmission and were “dead ends” for the virus and would end the pandemic. He has proven himself to be liar in this as his public messages and statements are contradicted in this new scientific paper written by himself and others. This corroborates our evidence presented in affidavits and books of evidence that the covid19 vaccines and vaccinations were based on lies, deception and fraud. I cite the scientific paper below.

Rethinking next-generation vaccines for coronaviruses, influenzaviruses, and other respiratory viruses
Fauci et al. 2023. Cell Host and Microbe.

[https://www.cell.com/cell-host-microbe/fulltext/S1931-3128\(22\)00572-8](https://www.cell.com/cell-host-microbe/fulltext/S1931-3128(22)00572-8)

News article about the scientific paper: <https://alexberenson.substack.com/p/dr-anthony-fauci-now-admits-the-mrna>

CDC

I further say that a scientific paper has been published showing the CDC made many statistical errors, mistakes, and lied to and deceived the general public about covid19 and made the covid19 pandemic

appear far worse than it was. This has had a disastrous effect on government health policies and laws in the USA and other countries including Ireland.

Statistical and Numerical Errors Made by the US Centers for Disease Control and Prevention During the COVID-19 Pandemic

Prasad et al. 2023

https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4381627

I further say that in addition to lies, there was the strategic use of deception and lies to promote excessive fear and panic among the general public to force them to accept lockdowns, masks and covid19 vaccines. The evidence and facts and all opposing views were dismissed and censored by those politicians intent on pushing the fear and panic agenda on the public. This occurred in several countries including Ireland. The ex Minister for Health in Britain, Matt Hancock, has recently been publicly exposed as being a prime example of this. The whatsapp messages of Matt Hancock have been released for the public to view and they are shocking. I cite a link to news reports about this below

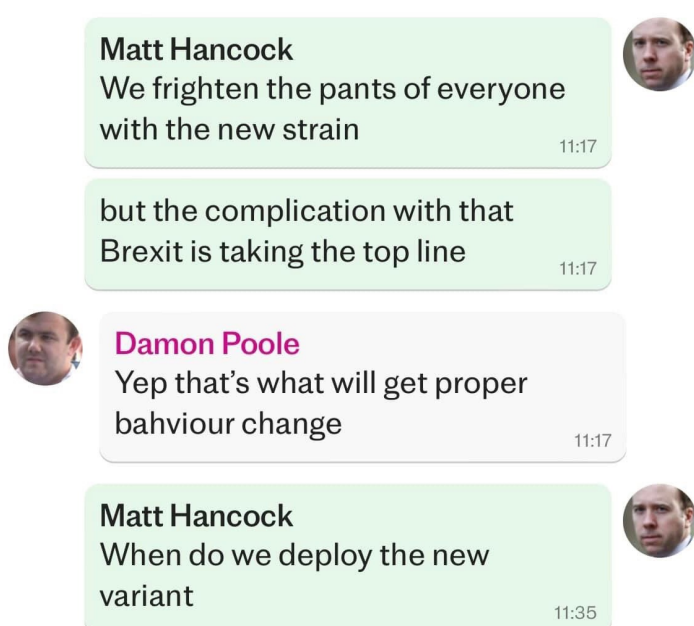
<https://www.google.com/search?q=matt+hancock+whatsapp+frighten>

The Lockdown Files at <https://www.telegraph.co.uk/news/lockdown-files/>

and news articles about this at <https://expose-news.com/2022/12/10/deluded-hancock-thinks-he-got-it-right/> and <https://www.spectator.co.uk/article/the-shabby-dishonesty-of-matt-hancocks-diaries/>

and <https://www.spectator.co.uk/article/the-truth-about-matt-hancock/>

and I include a message sent by Matt Hancock to others proving this.



25 January, 2021



Damon Poole | Department of Health Media Special Adviser
Have you spoken with tedros about nvap

13:21



Matt Hancock
yes

13:52



messed

13:52



Damon Poole
No promises but I'm trying to land a Bill gates endorsement of the platform

18:52

Matt Hancock

Tell him that considering how many people I'm getting his chips injected into, he owes me one!

18:53



Damon Poole
Haha

18:53

It should be pointed out to the court that Matt Hancock has not elucidated exactly what he meant by 'chips' being injected into people. The role of Tedross and Bill Gates in government decision making was very revealing as they are unelected and do not serve the people. They serve profit interests, Big Pharma interests, and Globalist interests. Why did politicians and government Ministers serve the profit interests of Big Pharma, Tedross and the WHO's funders and Bill Gates during the covid19 era ?

I further say the government and health authorities in Ireland and several other countries forced the people to wear masks during the covid19 pandemic and used the police, courts, fines, and jail sentences to harshly enforce this on the general public. The scientific evidence, including RCT's, meta analysis, and Cochrane reviews, now prove that the masks they promoted did not work and do not work. The masks do not stop transmission of the virus and do not stop infection. The only masks which do work are those worn by scientists in level 3 to level 5 laboratories which are sealed off. These were not used by the general public during the covid19 pandemic. The purpose of masks and mask mandates and lockdowns was to create mass fear, paranoia, and panic and an artificial demand for covid19 vaccines. And this has been reinforced by the fact that effective medical drugs and early treatments for covid19 available since May 2020 were blocked and banned by government and health authorities. We have expert witnesses who will testify to this fact in the High Court.

I cite scientific studies about masks below.

Physical interventions to interrupt or reduce the spread of respiratory viruses

Jefferson et al. 2023

<https://pubmed.ncbi.nlm.nih.gov/36715243/>

Effectiveness of Adding a Mask Recommendation to Other Public Health Measures to Prevent SARS-CoV-2 Infection in Danish Mask Wearers : A Randomized Controlled Trial

Bundgaard et al. 2021

<https://pubmed.ncbi.nlm.nih.gov/33205991/>

Nonpharmaceutical Measures for Pandemic Influenza in Nonhealthcare Settings—Personal Protective and Environmental Measures

Xiao et al. 2020

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7181938/>

The evidence showing the failures of lockdowns, social distancing, masks and vaccines from 2020 to 2022 are provided in our books of evidence, numbers 1 to 15

Top scientists and medical doctors have issued a report detailing the failures of lockdowns, social distancing, masks and vaccines and they have called for a public inquiry or commission into these failures.

The title of this Report is **QUESTIONS FOR A COVID-19 COMMISSION**

and this is **Exhibit 73** for the High Court

<https://dailysceptic.org/wp-content/uploads/2023/02/QUESTIONS-FOR-A-COVID-19-COMMISSION-by-the-Norfolk-Group.pdf> or <https://dailysceptic.org/2023/02/07/martin-kulldorff-jay-bhattacharya-and-colleagues-demand-a-full-inquiry-into-americas-disastrous-covid-response/>

or <https://www.data-analytica.org/questions.pdf>

Dr. Jay Bhattacharya, a Professor of Medicine at Stanford University in the USA said that there was no scientific consensus about lockdowns, masks, school closures, covid19 vaccines, mandates and passports, and he said "What happened was a relatively small group, a cartel almost, of very powerful scientific bureaucrats took over the whole apparatus of science — at least as far as the public eye is concerned — dominated the media, dominated the message to politicians, and as a result, we had a catastrophic response to COVID. And we're going to be paying the costs of that for a very long time."

Source: <https://twitter.com/i/status/163218327778763779>

Peter Daszak a central figure in the covid19 pandemic and the Wuhan laboratory and gain of function studies stated the following prior to the covid19 pandemic, which explains why this was done and sums it all up:

"We need to increase public understanding of the need for medical countermeasures such as a pan-coronavirus vaccine. A key driver is the media and the economics will follow the hype. We need to use that hype to our advantage, to get to the real issues. Investors will respond if they see profit at the end of the process."

The evidence shows that the selling of covid19 vaccines and the making of massive profits and financial gains including commissions, undeclared payments, inducements, grants, investments, etc. and massive transfers of wealth from this was the objective of all of these measures above - masks, lockdowns, social distancing, business closures, mandates, passports, etc., and this was reinforced by the fact that vaccine injuries, illnesses, disabilities and premature deaths and the excess deaths they caused have been and are being completely ignored by government and health authorities. And effective medical drugs for treating covid19 since May 2020 were blocked, censored, and banned. This explains the motives behind those people in government and health authorities who brought in these harsh measures and laws and also deprived people of full and valid informed consent for these covid19 vaccines. The net effect of this is massive fraud perpetrated on the Irish people and nation and the unjust enrichment of some people at the expense of many people struck down by serious injuries, illnesses, disabilities and deaths from the vaccines.

Not all experts are equal, not all experts are honest experts, and not all experts are free of conflicts of interest. This High Court has to differentiate between honest experts, including honest scientists, honest medical doctors, honest medical professionals, and professors who are committed to the truth and honesty in science and have no conflicts of interest on one side and dishonest and untruthful “experts”, including dishonest scientists, dishonest medical doctors, medical professionals, and professors who have conflicts of interest. This is new territory for the High Court in Ireland, as courts are bound by the Irish Constitution and Natural Law and Irish law to establish the truth, the facts, and the honest evidence.

- 26.** In the context of vaccinations it is fair and reasonable for a court to assess and evaluate what exactly is being put into the bodies of vaccinated people ? The origins of the sars-cov2 virus and the gain of function performed on the virus and on the spike protein, and the fact that the covid19 vaccine forces the human body to produce this gain of function spike protein has huge significance to all people in all countries including in Ireland. Lives have been put at risk by both the gain of function virus and the gain of function spike protein which gets manufactured in the body through the covid19 vaccine. Indeed this gain of function spike protein can be manufactured in the human body for months and years according to science, thus presenting a continuous high risk to the vaccinated. Emails released under the FOI law in the USA show that Tony Fauci and other government officials and top scientists believed that a lab leak was responsible for covid19 and that gain of function studies had taken place on the sars-cov2 virus in the Wuhan lab. They decided to cover up the lab leak and deny it as the NIH had funded these scientific studies in the Wuhan lab. They lied to the public and deceived the public.

news report: <https://childrenshealthdefense.org/defender/covid-lab-leak-theory-cover-up-collapse-cola/>

and https://www.youtube.com/watch?v=sD0i_YxPATc

emails: <https://usrtk.org/wp-content/uploads/2023/01/Request-20-320.pdf#page=792>

US Congressional investigations and hearings are now revealing more and more about this gain of function virus and gain of function spike protein. Dr. Robert Redfield, former director of the Centers for Disease Control and Prevention (CDC), on Wednesday March 8th 2023 told the US Congress Select Subcommittee on the Coronavirus Pandemic he has “no doubt” the NIH and Dr. Anthony Fauci funded gain-of-function research that likely resulted in the creation of COVID-19 and its subsequent leak. This is more evidence of lies and deception on the part of Tony Fauci. Testimony from other scientists and doctors corroborated this at the US Congress Select Subcommittee on the Coronavirus Pandemic with one suggesting that a bribe of \$9 million had been offered and given to one scientist who changed his mind so as to agree with Tony Fauci.

<https://twitter.com/RobertKennedyJr/status/1633882887601651713>

and news story at <https://childrenshealthdefense.org/defender/cdc-robert-redfield-covid-origins/>

Dr. Robert Redfield, also testified that as CDC director at the time he was wrongfully and illegally excluded and kept out of the loop by Tony Fauci and the rest of the NIH establishment because he had a different opinion about COVID-19 origins, which he believed came from a lab in Wuhan. I cite him below

“I was told they made a decision that they would keep this confidential until they came up with a single narrative, which I will argue is antithetical to science,” said Redfield. “Science never selects a single narrative.”

“When you have a group of people that decide there could only be one point of view, that’s problematic,” Redfield said. “They squashed any debate.”

Addressing the “Proximal Origins” paper, Redfield described it as “an inaccurate paper that basically was part of [the] narrative they were creating.”

<https://twitter.com/i/status/1633808192151990272>

and <https://www.youtube.com/watch?v=TYiy2pclRxQ>

The paper ‘Proximal origin of SARS-CoV-2’ published in March 2020 was engineered by Fauci, Collins, Daszak and others and this paper is now exposed as a fraudulent paper, a fraud, and this fraud was used to censor people including scientists and medical doctors and the general public from 2020 to the present in 2023. This fraud led to other frauds and ultimately to the vaccine fraud and cover up.

More lies, deception and cover ups about the origins of the gain of function SARS-CoV-2 virus and gain of function spike protein are provided in previous affidavits, books of evidence, and a Statement of Truth to

be filed in the High Court in 2023. It should be pointed out the gain of function studies performed on the sars-cov2 virus and on its spike protein was concealed from the general public, and this has placed the public in considerable danger. This experimental covid19 vaccine is causing the human body to mass produce the gain of function spike protein for an indefinite period of time and this is placing the lives of many people including children in significant danger. These risks were not communicated to those people who got the covid19 vaccination, so there was no full and valid informed consent. This is another example of gaining informed consent by deception and fraud.

We raised the question of Bioweapons in a previous affidavit filed in the High Court and it is clear that both the gain of function virus itself and the gain of function spike protein both created in laboratories have both caused and are causing injuries, serious illnesses, disabilities and deaths to many people worldwide, means we must ask the question - has a Bioweapon in the form of a gain of function spike protein been unintentionally developed and injected into people ?

We again note that none of the above was communicated to people who got the covid19 vaccinations.

- 27.** I further say that on the subject of frauds, crimes, legal proceedings and courts, in December 2022, Swiss banker Mr. Pascal Najadi filed criminal charges and fraud charges against the Swiss President Alain Berset. This has been accepted by the prosecution authorities and will proceed to court in Switzerland. President Alain Berset is also the Head of the Department of Home Affairs and a former minister of health. Berset was accused of abusing his office under Article 312 of the Swiss Criminal Code. In the criminal complaint, he detailed how the health minister told Swiss television SRF on 27 October 2021 — a month before the referendum on extending the COVID certificate requirement — “with the certificate, you can show that you are not contagious.” Berset’s false assertion was particularly controversial and damaging considering that the Swiss population just weeks later voted on whether to extend the use of the Covid Certificate ; Switzerland voted in favor of keeping it and it remained in place through mid-February of 2022. This lie and deception caused massive criminal damage and losses to people in Switzerland. The lies and criminal fraud involved telling the public the following
- (i) covid19 vaccines were safe and effective
 - (ii) prevented transmission
 - (iii) they introduced vaccine passports on the grounds that covid19 vaccination prevented transmission of the virus. And they used these vaccine passports to discriminate against the unvaccinated people.

The scientific, medical and statistical evidence from around the world show these to be lies and a fraud.

Sources: <https://www.google.com/search?q=Alain+Berset+Pascal+Najadi> and <https://yandex.com/search/?text=Alain+Berset+Pascal+Najadi> and

<https://www.youtube.com/watch?v=AOCQ0pE2kro>

and

<https://beforeitsnews.com/alternative/2023/02/criminal-complain-against-swiss-president-by-vaccinated-man-who-claims-he-was-deceived-important-interview-for-the-world-with-dr-reiner-fuellmich-3788130.html>

Similar false claims about the covid19 vaccine occurred in Ireland in respect of the CMO, NPHET, NIAC, and the Minister for Health, and a similar crime was committed. The lesson here and precedent here has relevance to Ireland and other countries in the sense that fraud is a crime, and that people are equal before the law, and nobody has special privileges to break laws and Constitutions and get away with it.

28. Pascal Najadi has also successfully filed a civil case against Pfizer and the FDA in the New York Supreme Court in the USA on March 7th 2023. This is mostly based on the evidence for the criminal fraud case he is taking in Switzerland. The Supreme Court case number is 100197 / 23.

29. PCR test for covid19

The scientific evidence presented in Point 24 on page 81 in the December 2022 affidavit I filed in the High Court shows the PCR test was defective and flawed and was a fraud. And the use of 40 to 45 cycle counts for PCR tests in Ireland led to a false positive rate of 97% for covid19 in Ireland. 97% of covid19 cases were false positives. This is fraud. This fraud and deception was cynically used to create fear and paranoia in the Irish public and implement lockdowns and mandatory masks and create an artificial demand for covid19 vaccines. And was also used to create vaccine passports for the purpose of illegally discriminating against the unvaccinated, and creating a system of apartheid in Ireland.

I further say that the tests for the covid19 virus and the covid19 vaccines are not based on an actual virus isolated from an infected person and subjected to Koch's Postulates and its full genome identified and mapped. The virus and spike protein are based on a synthetic computer-generated virus RNA code. This is very poor quality and inadequate science. The NIH database itself reveals that the original Hu1 reference strain was not isolated from a human host because no isolation date is given and no specific person is specified as the host, and no part of the body is specified as providing the virus and no pathology lab is specified as a location in any of the 3 iterations to what became the reference coding for the vaccines. So the reference strain that is used to generate every covid vaccine (except the Chinese and the Indian whole virus vaccines) is not from a physical virus. It is a synthetic computer-generated virus RNA code. It was given to the NIH and the western countries by the Chinese, but the Chinese communist regime has proven itself to be untrustworthy in the past. If it had been isolated from a human, then the MHRA and NIH database would describe that human and we would know which hospital pathology department processed the swab. But it does not. This has been verified in Freedom of Information

requests to the MHRA in Britain. This correspondence was published on a British web site at <https://expose-news.com/2023/01/23/synthetic-pandemic-covid-manmade-vaccines-deadly/>

The governments and health authorities have no proof or evidence that the synthetic computer-generated virus RNA code is equivalent to the sars-cov2 virus. If this vital evidence cannot be provided then the whole covid19 pandemic and vaccines were based on a fraud.

I further say that in previous affidavits, scientific proof of the existence of the sars-cov2 virus was requested from the Irish government and health authorities in the past. No such proof was provided by them. The conclusive scientific proof of the existence of the sars-cov2 virus or covid19 virus has not been provided worldwide. I cite a scientific analysis of this below

<https://telegra.ph/Leading-Corona-researchers-admit-that-they-have-no-scientific-proof-for-the-existence-of-a-virus-07-31>

This includes the important question:

"If the particles that are supposed to be SARS-CoV-2 were not purified, how can you be sure that the RNA gene sequences of these particles belong to a particular new virus?"

With no isolated and purified virus, there is no accurate gene sequence for the virus identified, and no accurate PCR tests to identify the virus. **This scientific analysis is Exhibit 90 for the court**

The PCR test for covid19 was developed by Dr. Christian Drosten and Charité in Germany before the first scientific publication on the virus by the Chinese. So there was no clinical data available to develop a PCR test at all. Dr. Christian Drosten even admits this, thus admitting fraud. And this PCR test fraud was used worldwide including in Ireland and was used to promote mass fear and paranoia via "covid19 cases".

The burden of proof for the existence of the virus is on the Irish government and health authorities. If no scientific proof can be provided, then it is another ground for fraud. And the covid19 vaccines would be based on this fraud.

The PCR test fraud aided and abetted other frauds, including the vaccine fraud, committed against the Irish people and nation, and these frauds led to the creation of a system of apartheid in Ireland not seen in Ireland since the Penal Laws of the 1700's and 1800's.

30. I further say that more evidence has emerged of PCR test fraud for covid19. Test Laboratories decided that rather than requiring two out of three gene positives to define a positive for covid19, they decided only one was enough, and this breached WHO rules and Manufacturer guidelines. Dr. Martin Neil has detailed this fraud on the following web page at

<https://wherearethenumbers.substack.com/p/uk-lighthouse-laboratories-testing-for>

and in a scientific paper at http://www.eecs.qmul.ac.uk/~norman/papers/Neil_PCR.pdf

and he had a letter published in the British Medical Journal about this

<https://www.bmj.com/content/372/bmj.n208/rr-3>

- 31.** I further say that in March 2023, the German Minister for Health, Karl Lauterbach, has publicly admitted that the covid19 vaccines are causing a significant number of illnesses, disabilities and deaths, and this has been ignored by the German government. As recently as February 2022, Karl Lauterbach claimed COVID-19 vaccines are free of side effects.

Source: <https://childrenshealthdefense.org/defender/karl-lauterbach-germany-covid-vaccine-injuries/>

The lies, denials and frauds of governments and health authorities are finally being exposed. This has relevance to Ireland where a similar campaign of denials, fob offs, lies, and frauds against vaccinated people was carried out.

32. Covid19 vaccine injured people to give their testimony as witnesses in the High Court

We will present an army of covid19 vaccine injured to the High Court in this High Court case to give their testimony to the High Court. These people did not give their full and valid informed consent for these vaccines, as they were not told about the dangers and risks of these vaccines and the high number of vaccine injuries, illnesses, disabilities, and deaths. And they will state that all they told was that the vaccines were “safe and effective” by the Irish government and health authorities and by their parrots in the press and media. Now these vaccine injured people are suffering the consequences in terms of new illnesses and disabilities, loss of income and career, and the higher risk of premature death.

These people were the victims of deception and fraud.

- 33.** To compound this fraud on the part of certain Irish politicians and senior civil servants, there was and is no covid19 vaccine injury program for those many thousands of Irish people injured, made seriously ill, disabled or killed by the covid19 vaccines. Other countries have had this type of program for decades, but not Ireland. Irish politicians and governments have not served the people of Ireland in relation to this, and this is a most serious failure on the part of the government as it involves massive financial losses from vaccine caused injuries, serious illnesses, disabilities and premature deaths. Very ill people who are damaged by these vaccines are forced to take expensive court cases in the High Court against the best lawyers and barristers that the State can buy. And if these ill people lose their case they can be sued for hundreds of thousands of euros by the State, and lose their homes and assets.

This is another example of fraud, where those many people fraudulently duped into getting these experimental and unsafe covid19 vaccines got injured, were made seriously ill, disabled or killed by these vaccines and are now blocked by excessive legal costs and other obstacles from getting compensation and getting justice under law. This fraud is an outrageous abuse and breach of their Constitutional rights,

34. Expert Witnesses to give their testimony in the High Court

We will present top scientists and medical doctors as expert witnesses for this High Court case who will confirm and verify the evidence we present to the court, and the harms caused by the covid19 vaccines and the fact that full and valid informed consent was not given for these vaccines.

These expert witnesses will outline the deception and fraud involved.

35. Evidence has emerged that batches of the Pfizer covid19 vaccine differed in terms of ingredients and adverse effects. This was also the case for the Moderna vaccine. This is in our books of evidence. The result of this is that some batches of the covid19 vaccine caused serious illnesses or disabilities or deaths while others had a mild adverse effect or no adverse effect. Some ethical hackers managed to hack the databases of vaccine companies and they put this evidence about bad batches on a web site at <https://www.howbadismybatch.com>. This was also exposed by the German and American lawyer Reiner Fuellmich and shows that both Pfizer and Moderna were tracking and monitoring these bad batches. Under Irish and European law and under medical ethics, the vaccine batches should have all contained the same ingredients and had the same risk factors and the general public were led to believe that this was the case. But the fact that was not the case and the general public were misled and lied to shows that a fraud has been committed. The net effect of this is fraud and obtaining the informed consent of people by fraud and deception.

36. The CDC concealing and hiding the V-Safe data detailing a high number of vaccine injuries, illnesses, and disabilities while at the same time publicly declaring the vaccines to be safe. . This was deliberate concealment and deliberate deception. This v-safe data was released under court order in the USA in October 2022. The legal point here is that there was deliberate concealment of information about safety accompanied by false claims about safety. The net effect of this is fraud and obtaining informed consent by fraud and deception. This was detailed in our affidavits in December 2022 and in January 2023. V-Safe data from the USA is also used by the EMA to determine the safety of these vaccines in Europe, including Ireland.

37. Data from the Pfizer trial shows that the Absolute risk reduction is 0.84%, this is the most accurate measure of vaccine effectiveness. It reduces one's chance of getting covid19 by 0.84%. Pfizer falsely claimed that the risk reduction was 95% but this is the relative risk reduction and it is not the most accurate measure. The general public was misled into believing that effectiveness was 95% when in reality it was 0.84%. This effectiveness of 0.84% is very small and does not justify mass vaccinations and vaccinations of young children where the risks of them developing serious injuries, illnesses, disabilities and death is significant. Many published scientific studies worldwide and official statistics show that the

vaccines were ineffective and have negative efficacy after 4 months. Published scientific studies in this testimony in Point 18 of the December 2022 affidavit and in our books of evidence clearly show that the covid19 vaccines are ineffective as the virus is able to mutate and evade the vaccine through new variants. And the science is showing that the vaccine is leading to antibody dependent enhancement or immune priming and the a weakened immune system. This explains the high covid19 infection rate among covid19 vaccinated people and the need for boosters which are also becoming ineffective. The Irish government and health authorities stating that the covid19 vaccines were “effective” or “95% effective” was and is deliberate misrepresentation, deception and fraud. The net effect of this is fraud and obtaining the informed consent of people by fraud and deception.

38. Ingredients

The Non disclosure of the covid19 vaccine ingredients which are harmful and dangerous to human health. Independent researchers and scientists found graphene, and other toxins and nanoparticles in these vaccines which are harmful to human health. The EMA in Europe and the Irish government, regulatory and health authorities made no attempt to identify and publish all of the ingredients of the covid19 vaccines. Yet they falsely claimed they were safe and effective without knowing all of the ingredients, some of which have been found to be very harmful by scientists and doctors. There was no independent quality control to verify and assure safety. And the non disclosure of vaccine deaths, injuries, illnesses and disabilities to vaccine recipients, and to the general public including children and parents after April 2021 when these were officially known by Pfizer and other vaccine makers and by the government regulatory and health authorities in Ireland and Europe, while using propaganda to tell the general public that covid19 vaccines were safe and effective is another fraud. The net effect of this is fraud and obtaining the informed consent of people by fraud and deception.

The FDA and NIH in the USA, the European Medicines Agency in Europe, NIAC, the HPRA, NPHET, the HSE and the CMO in Ireland, the MHRA, SAGE and the CMO in Britain are all complicit in this fraud and bear responsibility for the many effects of this fraud on millions of people.

The vaccine ingredients have not been independently scientifically analyzed to identify ingredients and conformance with the vaccine label by the European Medicines Agency, the Irish health and regulatory authorities, the MHRA and the FDA. And regular independent sampling of vaccine batches was not undertaken to identify ingredients. This is a major failing by these regulators and health authorities. The general public have been put at serious risk for this failure.

Independent scientists have found some dangerous items in these covid19 vaccines and have published reports on this which we supplied in our previous affidavits and books of evidence. Yet the Irish government and health authorities are alleging that the covid19 vaccines are “safe and effective” when

they have not examined the ingredients of these vaccines and whether the ingredients are safe or not, thus their claim is false. This is fraud.

This is another ground for fraud we are adding to the existing grounds for fraud.

- 39.** Leaked documents from the European Medicines Agency (EMA) state that there is no biological characterization of the spike protein and the mode of action is not described. This is an essential requirement for vaccine approval. No regulators, including the EMA know what protein is being expressed in the body after vaccination with mRNA vaccines. This problem has not been rectified by Pfizer. This means that the Pfizer covid19 vaccine should not have been approved by the European Medicines Agency as it did not meet essential requirements. This amounts to fraud. And the European Medicines Agency (EMA) do not know anything about the proprietary lipids used in the Pfizer vaccine, nothing about their pharmacology and manufacturing process, but this is an essential requirement for vaccine approval. This is another fraud. There are substantial breaches of Irish laws, the Irish Constitution, international Human Rights laws and binding international treaties here.

The secret involvement of the US Department of Defense in covid19 vaccine development, testing, manufacturing and contracting in the private sector and the implications of this for safety testing or lack thereof was not disclosed to the general public in the USA, Canada and the European Union. This Non Disclosure and its negative impact on covid19 vaccine safety testing and reporting to the public, vaccine safety, and on full informed consent amounts to fraud. Also there are substantial breaches of US laws, the US Constitution, international Human Rights laws and binding international treaties.

These frauds were identified by Katherine Watt and she provided a public lecture about this online at

<https://www.bitchute.com/video/8ftbShzrkjl9/> (starting at point 19:45)

and legal and historical information about this at:

<https://bailiwicknews.substack.com/p/american-domestic-bioterrorism-program>

and <https://bailiwicknews.substack.com/p/repost-biotech-idolatry-dod-pfizer>

and <https://sashalatypova.substack.com/p/reviewing-the-dod-contracts-for-covid>

and <https://substack.com/profile/8540123-katherine-watt>

- 40.** Scientific studies show that the mRNA does not stay at the site of the injection in the arm, it gets distributed around the body. Spike proteins are manufactured all over the body including in tissues, organs and blood vessels and are distributed throughout the body. The mRNA and spike proteins can last in the body for months, possibly years according to scientific studies. This has caused serious harms and even deaths to vaccinated people. The spike proteins pose serious health risks and dangers over time to vaccinated people. For example, spike proteins accumulating in the female reproductive organs have had dire consequences for girls and young women and unborn babies and spike proteins accumulating in the

male reproductive organs have had dire consequences for boys and young men. We have detailed some of this in this affidavit and prior affidavits. These facts were not explained to vaccine recipients and to the general public. The Irish government and health authorities and the EMA did not explain this to vaccine recipients and the general public. This was deliberately covered up. They falsely told the general public that the mRNA and spike proteins remained at the injection site. The net effect of this is fraud and obtaining the informed consent of people by fraud and deception. And losses have resulted from this fraud including deaths, illnesses, disabilities, loss of jobs, loss of careers, and loss of families and homes.

Marc Girardot's Bolus Theory presents scientific evidence of the massive destruction and damage caused to the human body by wide dispersal of mRNA and spike proteins throughout the body, to the organs and the blood vessels - <https://covidmythbuster.substack.com/p/the-cytotoxic-bolus-theory-on-the>

41. I further say that a very relevant case to this High Court case took place recently in Limerick District Court in 2023, and the scientific and medical reasons and the legal reasons for the covid19 lockdowns and vaccines were shown to be false and defective by a Mrs Martina Gorham, and the judge and court accepted this and dismissed the case against her on these grounds. The record number of this court case in Limerick District Court is 2021/32561. I cite these grounds in **Exhibit 102** for my High Court case. It is more proof and evidence that the covid19 pandemic and covid19 vaccines were based on lies, deception and frauds. I plead this as an additional ground for fraud in relation to these covid19 vaccines. And as an additional grounds for the Injunction we request in the High Court.

I quote from her court case of DPP vs Martina Gorham in Limerick District Court in 2022, record number 2021/32561, the following facts and evidence below was presented to court. Based on this evidence and fact, the criminal charges and case against Martina Gorham was dismissed.

' I am enclosing documents from the HSE under freedom of information (FOI) requesting the describing of **an isolated sample** of the SARS-COV-2 virus (Coronavirus COVID-19), taken directly from a symptomatic patient with COVID-19. The HSE's reply was that the "records concerned do not exist."

I have enclosed documents APPENDIX A which requests under FOI the "proven scientific effectiveness of **lockdowns** as a means of containing the spread of SARS-COV2 (Covid-19) or similar pathogens". The HSE response was that "This Body (The HSE) does not hold the records which you have sought... records concerned do not exist."

I have enclosed documents which requests under FOI the "proven scientific **effectiveness of masks** or face – masks as a means of containing the spread of SARS-COV2 (Covid-19) or similar pathogens". The HSE response was that "This Body (The HSE) does not hold the records which you have sought... records concerned do not exist."

I have enclosed documents which requests under FOI the “proven scientific **effectiveness of social distancing** as a means of containing the spread of SARS-COV2 (Covid-19) or similar pathogens”. The HSE response was that “This Body (The HSE) does not hold the records which you have sought... records concerned do not exist.”

I have enclosed documents which requests under FOI the “proven scientific **effectiveness of the vaccine or vaccines which the HSE has approved as a means of limiting or containing the spread of SARS-COV2 (Covid-19) or providing the recipient with personal immunity against it**”. The HSE’s response was that “This Body (The HSE) does not hold the records which you have sought... records concerned do not exist.”

I have enclosed documents which requests under FOI the “proven scientific **safety of the vaccine or vaccines which the HSE has approved as a means of limiting or containing the spread of SARS-COV2 (Covid-19) or providing the recipient with personal immunity against it**”. The HSE’s response was that “This Body (The HSE) does not hold the records which you have sought... records concerned do not exist.”

The HSE has no evidence to back up any of it’s claims in public about covid19 and the vaccines. This appears to be more evidence of fraud.

- 42.** While on the subject of Fraud, it has come to our attention that a Freedom of Information request was made to the HSE on the 22nd December 2020 by a Mr. Robert Pye for information about the isolation of the sars-cov2 virus. The HSE replied on the 23rd December 2020 and revealed that it had no information, no evidence, and no proof that the sars-cov2 virus had been isolated and that it existed. This is an extraordinary admission by the HSE considering the fact that HSE officials and Department of Health officials including the Minister and CMO had been spreading fear and panic in the press and media about this sars-cov2 virus also known as “covid19”. The HSE appears to be involved in a fraud, but we are hoping they will clear up this matter and clarify the issue for the High Court and the general public, and provide evidence of the existence of the sars-cov2 virus also known as “covid19” and its full genome and a scientific trial to prove transmission of the virus between humans, which will rectify this matter for the court and the general public.

I submit Exhibit 38 to the court showing this.

A Freedom of Information request was made to the HSE on the 28th December 2020 by a Mr. Robert Pye for information about the safety and effectiveness of the covid19 vaccines. The HSE replied and said they had no such information to give him. The HSE had no proof and no evidence that the covid19 vaccines were safe and effective, and it appears that the HSE have implicated themselves in a fraud.

I submit Exhibit 39 to the court showing this.

43. Dr. Kathryn Edwards, a member of Pfizer's data safety monitoring board (DSMB), was previously a paid adviser to Pfizer over several years. DSMBs are supposed to be independent, they cannot be independent if members have had previous financial and business relationships with the company. In a court case in the USA, lawyer Aaron Siri showed to the court that Dr. Kathryn Edwards had a serious conflict of interest which completely undermined her and discredited her and undermined the safety monitoring process for Pfizer covid19 vaccines, making any claims about safety defective and fraudulent. An American news broadcast about this is at <https://thehighwire.com/videos/the-deposition-of-the-godmother-of-vaccines-dr-kathryn-edwards/> and news report at <https://childrenshealthdefense.org/defender/kathryn-edwards-pfizer-covid-vaccine-conflict/>

44. Conflicts of Interest

In prior affidavits and in our books of evidence and in the Pfizer internal documents released under federal court order in the USA there is clear evidence that the regulatory authorities including the FDA in the USA, the EMA in the European Union and the Irish regulator and regulatory bodies in several other countries knew about the dangers of these covid19 vaccines and the significant risk of premature deaths and serious illnesses and disabilities but they refused to tell the general public about this or take actions to protect the general public including suspend or end these vaccinations and subject them to rigorous new safety tests and ingredients tests. These regulatory bodies refused to regulate. This is an important legal point, as they got money from the government and private bodies to regulate and monitor vaccines and medical drugs but they refused to regulate. This in itself is a fraud. And the other fraud relates to Non Disclosure of dangers to the general public while falsely telling them these vaccines were "safe and effective". In Point 31 in the affidavit filed in the High Court in December 2022 we outlined some of the corruption and massive fines paid by Pfizer in the past. And in Points 62 and 63 of the January 2023 affidavit I say there are serious Conflicts of Interest and regulatory capture involved in the approval of covid19 vaccines and boosters. More grounds for fraud are laid out in those points and affidavits.

I say that Point 62 in the January 2023 affidavit outlines the way Pfizer did business and other big vaccine companies did business and outlines the role of conflicts of interest and regulatory capture and the breaking of laws in today's world. There are serious Conflicts of Interest and regulatory capture involved in the approval of covid19 vaccines and boosters

In the UK, the MHRA gets 86% of its funding from the Pharmaceutical companies and in the USA the FDA gets 65% of its funding from the Pharmaceutical companies and the European Medicines Agency (EMA) receives over 89% of its funding from Pharmaceutical companies and the Australian TGA gets 96% of its funding from them. The Regulators are funded by Big Pharma. This is a clear conflict of interest. This conflict of interest completely undermines the validity of approvals for vaccines and drugs and has

contributed to non regulation, non enforcement and non oversight. The quick approval of the covid19 vaccines without full investigations of their safety and effectiveness and their ingredients by Regulators shows a major defect and failing in the Regulatory processes. The NIAC and HPRA in Ireland followed the orders of the EMA in Europe and let them decide on covid19 vaccinations for Ireland, according to documents received by us in this court case.

The Gates Foundation is the second largest contributor to the World Health Organization and The Gates Foundation has large investments in vaccine companies and Big Pharma. This is a clear conflict of interest. GAVI consists of and represents Big Pharma companies and it is another big contributor to the WHO. This is another conflict of interest. Both The Gates Foundation and GAVI have considerable power and influence over the WHO. These conflicts of interest can determine the policies and actions and direction of the WHO. For example, the WHO declaring pandemics and epidemics acts as a revenue and profit driver for vaccine companies, Big Pharma, GAVI members, and The Gates Foundation. The WHO is not an independent organisation and has several conflicts of interest and it is not accountable and not transparent. The WHO is not credible and should not be relied upon by the defendants in their affidavits and in this court case.

An article recently published in the British Medical Journal (BMJ) outlines this problem. Conflicts of interest are the driving force for approval of many vaccines and drugs and non regulation, non enforcement and non oversight of them, and placing the public in significant danger.

From FDA to MHRA: are drug regulators for hire?

Maryanne Demasi. 2022. BMJ.

<https://www.bmj.com/content/377/bmj.o1538>

Confirmation of Conflicts of Interest and Non Regulation and No Oversight

In January 2023, a Pfizer executive, Jordon Trishton Walker, revealed to a reporter for the Veritas Project that the Regulators were failing to regulate properly as many of their personnel hoped to get well paid jobs in Big Pharma companies. The safety of the general public was being completely ignored. He also revealed that Pfizer was secretly involved in gain of function studies to develop new covid19 vaccines. Their sole objective was more profit and a complete disregard for the safety of the general public. The High Court needs to take this point into consideration in its judgment and verdict.

Sources:

<https://www.youtube.com/watch?v=ywlpArNWKxM> and

<https://www.projectveritas.com/news/pfizer-executive-mutate-covid-via-directed-evolution-for-company-to-continue/> and

https://rwmalonemd.substack.com/p/project-veritas-has-broken-pfizers?utm_source=substack&utm_medium=email#play

Many FDA, MHRA and EMA executives and senior officers worked in Big Pharma and for vaccine companies in the past, and many executives in Big Pharma and vaccine companies previously worked for the FDA, MHRA and EMA in the past. There is a revolving door between the regulatory bodies and Big Pharma. This has created serious conflicts of interest. For example, the activities of Scott Gottlieb who previously worked in the FDA but now works for Pfizer, who asked the Twitter management and board to remove and censor all criticisms of covid19 vaccines.

Documents released under court order in the USA reveal the FDA Licensed Pfizer Vaccine Without Following Normal Approval Process. A U.S. Food and Drug Administration official authorized the release of a Biologics License Application number for Pfizer's COVID-19 vaccine while regulators were still deciding whether to approve the license, according to newly released documents.

News report at <https://childrenshealthdefense.org/defender/fda-pfizer-covid-vaccine-documents-et/> and https://www.theepochtimes.com/exclusive-newly-obtained-emails-shed-more-light-on-cdcs-false-vaccine-safety-monitoring-statements_4768562.html

Document at <https://www.documentcloud.org/documents/23566005-fda-meeting-summary>

The FDA admitted in a letter to Pfizer in 2021 that it was unable to carry out safety tests on the Pfizer covid19 vaccine for myocarditis and pericarditis risks and they asked Pfizer to carry out these tests. This shows that the FDA was not able to regulate, not able to do necessary safety checks. I attach excerpts from this letter below. And there is no evidence to show that the EMA in Europe and HPRA in Ireland carried out safety tests on the Pfizer covid19 vaccine for myocarditis and pericarditis risks. Yet these regulatory bodies claimed the vaccines were "safe".



Our STN: BL 125742/0

BLA APPROVAL

BioNTech Manufacturing GmbH
Attention: Amit Patel
Pfizer Inc.
235 East 42nd Street
New York, NY 10017

August 23, 2021

Dear Mr. Patel:

Please refer to your Biologics License Application (BLA) submitted and received on May 18, 2021, under section 351(a) of the Public Health Service Act (PHS Act) for COVID-19 Vaccine, mRNA.

LICENSING

We are issuing Department of Health and Human Services U.S. License No. 2229 to BioNTech Manufacturing GmbH, Mainz, Germany, under the provisions of section 351(a) of the PHS Act controlling the manufacture and sale of biological products. The license authorizes you to introduce or deliver for introduction into interstate commerce, those products for which your company has demonstrated compliance with establishment and product standards.

We have determined that an analysis of spontaneous postmarketing adverse events reported under section 505(k)(1) of the FDCA will not be sufficient to assess known serious risks of myocarditis and pericarditis and identify an unexpected serious risk of subclinical myocarditis.

Furthermore, the pharmacovigilance system that FDA is required to maintain under section 505(k)(3) of the FDCA is not sufficient to assess these serious risks.

Therefore, based on appropriate scientific data, we have determined that you are required to conduct the following studies:

I say that while on the subject of failure to regulate and conflicts of interest which led to regulatory capture, the FDA approved the Moderna bivalent covid booster for millions of people based on antibodies in TEN MICE, who all got sick with Covid19 when challenged with the virus. And now, the FDA advisers are supposedly "angry" that Moderna did not present real-life data showing that bivalent-boosted people are

68% (3.2/1.9) more likely to get covid19. But the vaccinations continue and Moderna and other covid19 vaccine makers continue to profiteer. The EMA in Europe follows the lead of the FDA in the USA.

And the FDA failed to present a very important New England Journal of medicine study to Advisors before Vote to Recommend Bivalent Boosters. This is the subject of news reports in the USA -

<https://dailyclout.io/the-fda-failed-to-present-nejm-study-to-advisors-before-vote-to-recommend-bivalent-boosters/>

CDC ignored Increased Risk of Ischemic Stroke From COVID Bivalent Boosters After Identifying 'Safety Signal'

The CDC and U.S. Food and Drug Administration analysis of VSD data found:

- There was an increased risk of ischemic stroke in bivalent booster recipients ages 65 and older.
- The risk was present in the Pfizer formulation but not in Moderna's.
- The signal was raised because of increased stroke risk in the 21 days following inoculation compared to the risk on days 22-42.
- The signal did not change the CDC's recommendations for either bivalent boosters (Pfizer or Moderna).

Source: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety/bivalent-boosters.html>

news report: <https://childrenshealthdefense.org/defender/cdc-ischemic-stroke-covid-bivalent-boosters-safety-signal/>

CDC Knowingly Left Serious Adverse Events Off Post-Vaccination Surveys, Documents Show

The U.S. Centers for Disease Control and Prevention (CDC) didn't include serious adverse events like heart inflammation on post-vaccination surveys even though the agency knew the issues could be linked to COVID-19 vaccines, documents show.

https://www.theepochtimes.com/health/cdc-left-serious-adverse-events-off-post-vaccination-surveys-despite-knowledge-of-possible-link-documents-show_4988809.html

The CDC and FDA said in operating procedure documents that officials would monitor VAERS to identify "potential new safety concerns for COVID-19 vaccines," with the CDC performing PRR analysis. The CDC has issued multiple false statements on the data mining, but ultimately acknowledged it did not start performing the monitoring technique until 2022 — more than one year after the Pfizer and Moderna vaccines were authorized. And the FDA has also failed to monitor and publicly report these safety signals to the general public. Both the FDA and CDC have ignored hundreds of vaccine caused illnesses where safety signals were far above the threshold and they failed to communicate this to the general public. This is a major failure and points to no regulation and no regulatory oversight.

Source: <https://childrenshealthdefense.org/defender/cdc-safety-signals-pfizer-moderna-covid-vaccines-et/>

The Wall Street Journal published an article recently which pointed out these regulatory failures or regulatory capture.

The Deceptive Campaign for Bivalent Covid Boosters

Wall Street Journal. January 22, 2023

<https://www.wsj.com/articles/the-deceptive-campaign-for-bivalent-covid-boosters-cdc-fda-biden-vaccines-moderna-pfizer-wuhan-imprinting-11674400955>

Other news outlets reported on this - <https://www.zerohedge.com/political/wsj-shreds-vaccine-makers-biden-admin-over-deceptive-boosters-campaign>

Dr. Aseem Malhotra, one of the top Cardiologists in Britain gave a brilliant interview with Tucker Carlson on Fox News on American television. He described the role of conflicts of interest in the approval and distribution and injecting of covid19 vaccines and boosters and the dangers of these vaccines and boosters.

The failures of Regulators and the failed Regulation system are also explained. Link at <https://www.youtube.com/watch?app=desktop&v=w3MPnBpfrRk>

These are good examples of regulatory capture and conflicts of interest, the FDA and CDC in the USA and the EMA in Europe and the NIAC and HPRA have completely ignored safety signals for these covid19 vaccines and their policy is to ignore them and not to inform the general public. And continue to put the public at significant risk of serious injuries, illnesses, disabilities and premature deaths. And to ignore the deprivation of informed consent. There is no accountability and no transparency in these Regulatory bodies. There are NO independent bodies and scientists and lawyers, independently funded to independently assess, evaluate, monitor and make accurate and honest public statements about the safety and effectiveness and ingredients of vaccines and medical drugs and legally approve them. This deficiency needs to be rectified by governments, laws, Constitutions, international treaties, and courts.

This failure to inform the general public while they repeated the mantra that the vaccines were “safe and effective” amounts to fraud. This fraud completely undermined informed consent in the USA and also in Europe and Ireland. It is another count of fraud for our court case, and is included in our pleading of Fraud.

45. I say that a recent judgment of the Supreme Court of New York in the USA has created a precedent which is very relevant to our High Court case. In a groundbreaking ruling, the New York State Supreme

Court on January 13 2023, struck down the state's COVID-19 vaccine mandate for healthcare workers, declaring it "null, void, and of no effect" and holding that the New York State Department of Health (NYSDOH) lacked the authority to impose the mandate. Moreover, the court ruled that the state's mandate was "arbitrary and capricious" on the basis that COVID-19 vaccines do not stop transmission of the virus, thereby eliminating any rational basis for such a policy. This is one of the reasons we gave for why full informed consent was not and still is not being given and is one of several reasons given for our request for an Injunction in the High Court. And is also one of the grounds for fraud which we are pleading in this High court case and are an additional reason for this Injunction. By fraud, we mean that informed consent was and is being obtained by fraud and deception.

This Supreme Court ruling in New York is a victory for Freedom, Democracy, Scientific Truth and Honesty, Human Rights and the Rule of Law. It has set an important precedent for courts all over the USA and all over the world including in Ireland.

News report: <https://childrenshealthdefense.org/defender/chd-win-new-york-covid-vaccine-mandate/>

46. The HART group in Britain which consists of medical doctors, Hospital Consultants, Pathologists, Scientists and University Professors published two open letters to the MHRA in January and February 2022 calling on them to stop all covid19 vaccinations for children as there was data and statistics and scientific evidence to show that the vaccines were causing injuries, illnesses, disabilities and deaths to children and young adults. These two letters were signed by some of the eminent scientists, medical doctors, pathologists and academics in Britain. They exposed the fraud and deception behind approving and giving covid19 vaccines to children and the dangers to children from this.

I present Exhibit 1f to the court which is these 2 open letters from the HART group in Britain.

47. I say that a group consisting of 17,000 medical doctors, hospital consultants, top scientists, professors, and medical professionals, named 'Global Covid Summit', have publicly called for an end to all covid19 vaccinations since May 2022 due to their lack of safety and effectiveness and this has relevance to our court case. And they made a separate Declaration calling for an immediate end to all covid19 vaccinations of children.

The Global Covid Summit made this public statement in may 2022 and they made the following declaration

Our Global COVID Summit of 17,000 physicians and medical scientists from all over the world have reached consensus on the following foundational principles:

1. We declare and the data confirm that the COVID-19 experimental genetic therapy injections must end.
2. We declare doctors should not be blocked from providing life-saving medical treatment.

3. We declare the state of national emergency, which facilitates corruption and extends the pandemic, should be immediately terminated.
4. We declare medical privacy should never again be violated, and all travel and social restrictions must cease.
5. We declare masks are not and have never been effective protection against an airborne respiratory virus in the community setting.
6. We declare funding and research must be established for vaccination damage, death and suffering.
7. We declare no opportunity should be denied, including education, career, military service or medical treatment, over unwillingness to take an injection.
8. We declare that first amendment violations and medical censorship by government, technology and media companies should cease, and the Bill of Rights be upheld.
9. **We declare that Pfizer, Moderna, BioNTech, Janssen, Astra Zeneca, and their enablers, withheld and wilfully omitted safety and effectiveness information from patients and physicians, and should be immediately indicted for fraud.**
10. We declare government and medical agencies must be held accountable.

Source: Global Covid Summit web site at <https://globalcovidsummit.org/>

They called for criminal indictments for fraud. This backs up our pleading for fraud in this High Court case.

48. I say that an Open Letter to the Prime Minister of New Zealand, Jacinta Arden, detailing the scientific facts and evidence about covid19 vaccines and calling for an end to covid19 vaccinations and government investigations of crimes and frauds in relation to covid19 vaccines and the origins of the sars-cov2 virus . It was written by Dr. Carlton Brown BVSc, MBA and is viewable online at www.data-analytics.org/Letter.pdf

It should be noted that Jacinta Arden resigned as Prime Minister of New Zealand suddenly and in disgrace in January 2023. This is relevant. The facts presented by this medical professional in his letter have great relevance to the Irish people and nation and for this High Court case.

49. I say that on January 26th 2023, the Food and Drug Administration (FDA) is being sued by Children's Health Defense (CHD) for withholding the results of key COVID-19 vaccine safety analyses. This has implications for the EMA in Europe which follows the lead, the direction and decisions of the FDA, especially in relation to covid19 vaccines. The FDA's actions violate federal law, the new lawsuit, filed on Jan. 26 in federal court in Washington by the nonprofit Children's Health Defense (CHD), alleges. The suit is seeking the raw results from the FDA's analyses of reports to the Vaccine Adverse Event Reporting System (VAERS). The system, which the FDA runs with the U.S. Centers for Disease Control and Prevention, accepts reports of post-vaccination adverse events. As part of its vaccine safety monitoring,

the FDA pledged to run a type of analyses called Empirical Bayesian (EB) data mining on the reports to see if any safety signals were triggered. Signals give agencies an idea of which problems may be caused by vaccines. Agencies are supposed to research signals to verify them or rule them unrelated to vaccination. Both the FDA and CDC have failed in their duty to do this and failed to provide the American public and the public around the world with this important information and data. This has placed the lives of many Americans in danger and the lives of many European and Irish people in danger.

This has serious implications for Ireland and Europe as the EMA in Europe follows the lead, the direction and decisions of the FDA and has access to the same data as the FDA and CDC in the USA. Thus the EMA is also criminally culpable in hiding this important data. The signals so far for the vaccines show increased risk of premature death, and serious illnesses and disabilities, many life long, and more hospitalizations. This has placed the lives of many Americans in danger and the lives of many European and Irish people in danger.

Courts including High Courts need to be mindful of the fact that those people supporting mass covid19 vaccinations and boosters are in fact supporting crimes, frauds and criminality, and that this needs to be ended through the adjudications and judgments of the courts.

50. I further say the U.S. Food and Drug Administration (FDA) and the Centers for Disease Control and Prevention (CDC) cooperated to issue Emergency Use Authorizations (EUA) and roll out new, bivalent Pfizer and Moderna COVID-19 vaccines, without any human trials, which is unprecedented. The EMA in Europe has done similarly, and Ireland is impacted by this.

The new BA.4/5 bivalent vaccines were tested only in mice, not humans. Dr. Paul Offit a vaccine expert and advisor to the FDA and US government publicly objected to these vaccines. I cite CNN news channel:

“You can’t ask millions of people to get this booster dose without showing some human data that you have a dramatic increase in neutralizing antibodies to the BA.4/BA.5 strains as compared to boosting with the ancestral type,” Offit said, referring to the currently authorized shots based on the version of Covid that emerged in China, more than two years ago.

‘But some infectious disease and vaccine experts say the FDA should have waited for human data from the BA.5 shots before authorizing them. Dr. Paul Offit, a member of the FDA’s advisory committee, said data based on mice studies is not sufficient to justify authorizing the new boosters.’

‘ “You have to show some evidence in people that the immune response that you’re getting with the bivalent vaccine is clearly better, and those data haven’t been presented,” said Offit, an infectious disease and vaccine expert at Children’s Hospital of Philadelphia.’

And a news report by a medical doctor in the USA, Dr. Meryl Nass confirms that this is the case and that bivalent boosters lack safety and effectiveness.

<https://childrenshealthdefense.org/defender/covid-boosters-no-human-trials/>

According to the Vaccine Research Center, “A study in nonhuman primates showed that an Omicron specific messenger RNA vaccine was not better than the original messenger RNA-1273 [ancestral Moderna] vaccine for protection against Omicron challenge.” According to the Vaccine Research Center, the Omicron vaccines won’t stimulate a good Omicron response due to antigenic priming, also known as original antigenic sin. This means the immune system has been programmed to respond over and over again to the first coronavirus infection or vaccine it encountered, even when it encounters different coronavirus antigens later. This corroborates our previous affidavits and books of evidence. Study cited below:

mRNA-1273 or mRNA-Omicron boost in vaccinated macaques elicits similar B cell expansion, neutralizing responses, and protection from Omicron.

Gagne et al. 2022

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8947944/pdf/main.pdf>

No proper safety and effectiveness studies on humans in RCT trials places the vaccine companies and FDA, the EMA and other regulators in legal difficulty as they failed to regulate and failed to adequately protect the general public. This is pure fraud and another ground for fraud.

51. Criminal investigations and Prosecution cases involving the covid19 vaccines **which** include manslaughter, murder, poisoning, assault and battery, assault causing grievous bodily harm, conspiracy to commit crimes, corruption and conflicts of interest, frauds, endangering the public, malfeasance in public office, etc. Cover ups of these crimes are also being investigated. These are cited in our affidavit filed in the court in January 2022.
52. I further say that Professor Dr. Norman Fenton in England has found evidence that the Office for National Statistics in Britain has misclassified many covid19 vaccinated deaths as unvaccinated deaths. People dying shortly after getting the first covid19 vaccine were misclassified as unvaccinated. This means that deaths, including all cause mortality, for covid19 vaccinated people are much higher, and all cause mortality is even higher for covid19 vaccinated compared to unvaccinated people in Britain. The Office for National Statistics in Britain agreed with Professor Dr. Norman Fenton on this point in January 2023. This amounts to a serious error which needs to be corrected or amounts to fraud. This has great relevance to our High Court case.

Sources: <https://wherearethenumbers.substack.com>

and <https://www.youtube.com/@NormanFenton81>

and <https://www.youtube.com/watch?v=6SAh0bJN6hs>

53. In July 2022, Dr. John Su told the *Epoch Times* that the CDC began performing PRR analysis in February 2021 and “continues to do the same.” Dr. Su heads the CDC’s Vaccine Safety Team in charge of the Vaccine Adverse Event Reporting System (VAERS) of the CDC .In a letter from Rochelle Walensky CDC Director to US Senator Ron Johnson (R-WI), viewable at <https://www.documentcloud.org/documents/22309653-walensky-letter> the CDC director admitted that the agency did not analyze these types of adverse event reports at all in 2021. This contradicted the CDC’s earlier remarks that it had scrutinized these reports as early as February of 2021. So the CDC was lying and misleading the public about these vaccines. This failure of the CDC to monitor vaccine safety had serious consequences for all those persons who got vaccinated and it fuelled the fraud and deception used to promote these vaccinations and cover up the deaths, injuries, illnesses and disabilities caused by them. It completely undermined the public interest in addition to undermining informed consent of the people. The EMA in Europe and HPRA in Ireland relied and still rely on the CDC for vital information about these vaccines. The EMA also did not carry out these type of safety studies into the vaccines and disclose them to the public.

The whole covid19 vaccine program was a fraud, using fraud and deception to get informed consent and then using fraud to cover up the deaths, injuries, illnesses and disabilities caused by these vaccines.

54. I further say that in relation to Point 74 in the previous affidavit filed in January 2023, more evidence exists about the gain of function studies and patents which led to the development of sars-cov2 and the vaccine which is derived from its spike protein, and that the Fauci Dossier by Dr. David Martin details how this occurred. This Dossier details the crimes, frauds, deception, political corruption, conflicts of interest which has the public in danger from 2 Bioweapons – the gain of function sars-cov2 virus and covid19 vaccines and their the gain of function spike proteins. Link to Dossier below.

[https://www.davidmartin.world/wp-content/uploads/2021/01/The Fauci COVID-19 Dossier.pdf](https://www.davidmartin.world/wp-content/uploads/2021/01/The_Fauci_COVID-19_Dossier.pdf)

This is Exhibit 105 for the court.

55. Legal Questions to be addressed which have a bearing on Informed Consent and material risks and dangers

(i) Was the Attorney General of Ireland as legal advisor and Dr. Tony Holohan as chief medical officer and medical advisor to the 33rd Dail Eireann Irish Government, consulted in regard to the legality and ramifications of rolling-out an experimental mRNA vaccine to be administered to the general public, in

view of widely circulated safety issues publicly reported about it and its lack of effectiveness ?

(ii) Did the attorney general and chief medical officer make the legal and Constitutional effort to investigate the deaths, illnesses, and disabilities caused by the covid19 vaccines and the ineffectiveness of these vaccines against covid19 before and during the vaccinations of Irish people or did they neglect their legal and Constitutional duties in this ?

(iii) Does this neglect make the attorney general and chief medical advisor complicit in these deaths, illnesses and disabilities caused to many Irish people ? and if so, should the attorney general and chief medical advisor be held accountable legally ? and should the government be held accountable legally for not carrying out due diligence as required by the Constitution and laws of Ireland in such an important matter for the Irish people and nation ?

There is no absolute right to legal immunity for wrong doing, for non disclosure of material facts and risks and dangers to vaccine recipients which they attach significance to, and for gaining informed consent by non disclosure, false pretences, deception and fraud – all of which led to mass deaths, injuries, illnesses and disabilities. The Irish Constitution and Irish laws and international laws state that all are equal before the law and that criminal penalties and civil penalties will be applied in courts to guilty parties regardless of their social status.

Summation

I ask that the learned judges of this High Court consider the facts and evidence and the legal facts and precedents and laws cited above and act decisively and immediately on this, and implement the emergency injunction and any other measures they see fit to address this fraud. And that said injunction lasts until such time as this fraud and all the other crimes and wrong doing associated with this fraud are fully exposed to the general public and fully prosecuted in the Irish courts, and full and valid informed consent for vaccines becomes possible throughout Ireland.