

BETWEEN:

DAVID EGAN AND SHARON BROWNE AND EMMANUEL LAVERY

Plaintiffs

-And-

MINISTER FOR HEALTH, AN TAOISEACH, AND HSE

Defendants

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## Book of Authorities for Informed Consent

**Court precedents from superior courts in Ireland and abroad and national and international laws which apply in this case and 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. This led to both financial losses and human health losses and loss of lives including many people becoming seriously ill, disabled or suffering premature death caused by these experimental covid19 vaccines.**

**1. The evidence supplied to the High Court including sworn affidavits, exhibits, the statement of truth, and books of evidence.**

**2. Denial of full and valid Informed Consent. Obtaining of informed consent by non disclosure, false pretences, fraudulent misrepresentation, deception and fraud**

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.**

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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/>

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](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](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](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
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 [<sup>3</sup>H]-08-A01-C01 to Wistar Han Rats**  
(Continued)

**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](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](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 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. 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](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.

- 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.

- The mRNA and spike proteins last for a long time in the body, scientists believe it could be for years or decades. This risk extends to young girls aged 5 to 11 who will over time mature into women of child bearing age

**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 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](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

Hansen et al. 2023

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

- 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](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](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 did not comply with the regulations and rules of the EMA, the Regulator, and 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.

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, Vigiacess 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 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.**

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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\\_pllr-cumulative-review.pdf](https://icandecide.org/wp-content/uploads/2023/04/125742_S2_M1_pllr-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](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 2<sup>nd</sup> 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](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->

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](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
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 [<sup>3</sup>H]-08-A01-C01 to Wistar Han Rats**  
(Continued)

**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](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](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/>

- **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 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>

- **Failure to Regulate**

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](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.**

- **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](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](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.

- **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. 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](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](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 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](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](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 Almeida 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](http://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](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 below 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 26<sup>th</sup> 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\\_organial.pdf](https://tkp.at/wp-content/uploads/2023/01/1.PSUR_organial.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>

- 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.
- The blocking of autopsies and post mortems of healthy and young and middle aged people killed by the covid19 vaccines in Ireland and other countries. This was mentioned in our affidavit filed in December 2022 and in a section below in this document. And there is a refusal of Pathologists and Coroners to use the German Pathology methods and findings which establish how the covid19 vaccines are killing people. This is evidence of a cover up and more Non Disclosure 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
- 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 10<sup>th</sup> 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 11<sup>th</sup> 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**

<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2001:121:0034:0044:en:PDF>

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 politicians, 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 10<sup>th</sup> 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.

**(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=sDOi\\_YxPATc](https://www.youtube.com/watch?v=sDOi_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.



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 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.

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-analytics.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/1632183277778763779>

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.



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 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 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.

**3. 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.

**4. The frauds involved here and the Court precedents and laws dealing with obtaining the informed consent of people by deception and fraud**

The frauds involved here are listed and detailed in another document titled the ‘Book of Authorities for Fraud’ which we present to the court. And the court precedents and national and international laws relevant to this fraud are cited in that same book.

**5. Factors involved in the illegal, unlawful and unConstitutional blocking or prevention of Informed Consent by parents / guardians and members of the general public**

Not informing parents and guardians and members of the general public about the following:

- i. 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.

- ii. The Points raised above and sub-points (i) to (xiv) are relevant here in respect of deprivation of full and valid informed consent.
- iii. Knowledge that the covid19 vaccines were part of a phase 3 trial until mid 2023, and thus were experimental when given to the public. Placebos were and are being used and being called 'vaccines' and 'boosters' . Full knowledge that experiments are taking place and that placebos are being used and being called 'vaccines' and 'boosters' in some cases. This information was not provided to vaccine recipients and the general public.
- iv. 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 Fuelmich 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.

- v. knowledge of the myocarditis cases per 100,000 and the other illnesses and disabilities per 100,000 for children caused by these vaccines.
- vi. The number of people including children who got injured, developed illnesses or disabilities or died in the vaccine trials. Knowledge of the All Cause Mortality of the vaccine for children and adults. This information was not provided to vaccine recipients and the general public.
- vii. knowledge of the autopsy findings of Pathologists and Coroners in Germany and other countries confirming that the covid19 vaccines are causing serious damage to the human body and premature deaths.
- viii. pictures of the massive blood clots pulled of the dead bodies of covid vaccinated people by Embalmers, Pathologists, medical doctors and scientists. And microscope pictures of excessive blood clotting of the blood of covid vaccinated people. This information was not provided to vaccine recipients and the general public.
- ix. no child aged between 0 and 14 years old died of covid19 in Ireland. And knowledge that children have stronger natural immunity against covid19 than adults and hundreds of scientific studies show natural immunity is superior to covid vaccine induced immunity. The risk to children is tiny and almost zero, less than that colds and flus according to epidemiological data. This information was not provided to vaccine recipients and the general public. The risks to children from the covid19 vaccine far outweigh any alleged benefits.
- x. 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.

- xi.** 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

- xii.** Legally, informed consent must be voluntarily given, without any element of duress or coercion. It must be freely given without coercion or manipulation. This was not the case in Ireland. The vaccine mandates in the health service and in many businesses coerced their employees to get covid19 vaccines or they would lose their jobs. And the vaccine passports coerced or manipulated people into getting the vaccine so they could travel abroad or visit restaurants, pubs, clubs, concerts, cinemas and theatres. This coercion and manipulation by the government was illegal, unlawful and unConstitutional.
- xiii.** lack of capacity to make free, independent and fully informed decisions which would lead to full and valid informed consent as outlined in the December 2022 affidavit filed in the High Court. See section ‘Undermining and destroying the Capacity to make a Fully Informed Decision leading to Informed Consent’ below.
- xiv.** knowledge that the vaccine is a not a traditional vaccine and is in fact a type of gene editing device or gene experiment with unknown medium term and long term effects. This information was not provided to vaccine recipients and the general public.
- xv.** knowledge of the All Cause Mortality of the vaccine for children and adults who are members of the general public. This was not provided.
- xvi.** knowledge of the Absolute Risk Reduction for covid19 for these vaccines and the total loss of effectiveness after 4 months which is very important for assessing effectiveness and whether it is worthwhile getting it or not. The general public and vaccine recipients were told about relative risk reduction which was alleged to be 95% not about absolute risk reduction which was 0.84%.

**xvii.** knowledge about the illegal and unConstitutional censorship of medical doctors. Access of the general public to the independent and honest opinions of medical doctors who are free of all conflicts of interest. Most of these doctors were illegally censored from 2020 to the present in 2023. I cite an open and public letter containing advice given by a medical doctor, Dr. Pierre Kory to a mother of a child in the USA regarding informed consent and whether or not she should give the covid vaccine to her child. This letter provides the medical and scientific information and criteria which a parent should be given in order to make a fully informed decision and provide full and valid informed consent for their children. The letter is available online at

<https://pierrekory.substack.com/p/informed-consent-to-parents-contemplating>

The letter is divided into 9 points

1. efficacy of the COVID-19 mRNA vaccine in preventing illness in toddlers
2. risks associated with receipt of a COVID mRNA vaccine
3. risks of a healthy child suffering hospitalization and/or death from COVID
4. efficacy of the protection of natural immunity
5. benefits of health status in preventing severe outcomes
6. efficacy of COVID mRNA vaccine in preventing severe disease
7. efficacy of COVID mRNA vaccine in preventing transmission
8. efficacy of COVID mRNA vaccine in prevention of “long-haul” COVID
9. efficacy of alternatives to vaccination, i.e. early treatment options available

He states that the scientific and medical evidence show that the costs and risks of vaccinating the child far outweigh any benefits. He provides scientific evidence which clearly show the covid vaccines are NOT safe and NOT effective. And he states that there is a significant risk of injury, illnesses, disability or death for the child from this covid19 vaccine.

Dr. Pierre Kory is an honest medical doctor of the highest integrity and has many years experience and he has no conflicts of interest. The most important point here is that he has no conflict of interest, he is not being paid off to promote or inject covid19 vaccines. His organisation Front Line Critical Care Doctors was responsible for saving thousands of peoples lives from covid19 infections and also from covid19 vaccines in the USA.

Dr. Asseem Malhotra, a medical doctor and top Cardiologist in Britain provided an important public lecture in Britain in November 2022 where he showed how informed consent was not given for the covid19 vaccines, and he also published two peer reviewed scientific papers which confirm this fact in 2022. Dr. Malhotra also outlined the important role played by conflicts of interest in this denial of informed consent.

**I now present Exhibit 20 to the court containing a video of his public lecture.**

- xviii. the illegal and unConstitutional censorship of the press and media by government and of medical doctors by the medical council played a major role in non disclosure of vital and important information to the general public and to vaccine recipients, and in undermining and preventing fully informed decision making and the obtaining of full and valid informed consent.
- xix. Protecting children from harms and dangers is in the Public interest and involves the Common Good  
The Constitutional High Court needs to weigh up two important points  
(i) no children aged 5 - 11 in Ireland died of covid19 during the pandemic according to the CSO. **This is in Exhibit 1 which I have submitted to the court.** So there was and is no immediate threat to children from covid19. And certainly no need to vaccinate them. The mild omicron variant of covid19 has reduced the threat from covid19 for all age groups. A recent scientific study in Autumn 2022 by Dr. John Ioannidis one of the top Epidemiologists in the world and a Professor of Medicine, Health Research and Policy, and Biomedical Data Science in Stanford University in the USA, shows the following data for covid19

**Median Infection Fatality Rate (IFR)**

Age	Infection Fatality Rate
0-19	0.0027%
20-29	0.014%
30-39	0.031%
40-49	0.082%
50-59	0.27%
60-69	0.59%
70-100	2.4%

Infection fatality rate of COVID-19 in community-dwelling populations with emphasis on the elderly:  
An overview.

Ioannidis and Axfors. July 2021

<https://www.medrxiv.org/content/10.1101/2021.07.08.21260210v1.full-text> ’

**Now peer reviewed and published in European Journal of Epidemiology at**

<https://link.springer.com/article/10.1007/s10654-022-00853-w>

The children’s risk of dying from covid19 is less than colds and flus. This was not and is not being communicated to parents and children. A vital ingredient for informed consent is not being provided. This in itself is adequate reason for stopping the vaccinations of children.

(ii) the covid19 vaccines present a high risk of serious illness or disability or death to children and we present the scientific, medical, statistical and epidemiological findings in our affidavits, books of evidence and from our expert witnesses who are medical doctors and scientists. And this includes an additional

burden of new illnesses or disabilities for those children who were already sick prior to the invention of covid19 vaccines. For example, peer reviewed scientific studies show a background or natural rate of myocarditis for children of 4 per million, while those children who receive the covid19 vaccine have far higher rates per million according to a recent peer reviewed scientific study. And in that scientific study 29% suffered new heart and cardiovascular conditions and abnormalities. Subclinical myocarditis cases was 3.5% and confirmed by high Troponin levels in vaccinated children. That's 1 in 32 of children affected. The so called "experts" or doctors in Ireland don't bother checking for Troponin levels and subclinical myocarditis in covid vaccinated children and people under 40. And these so called "experts" in Ireland have carried out no scientific studies on this yet they claim to know it all.

There are several other scientific studies which corroborate the study above and which I will use in my legal argument in court. **According to scientific studies, 50% of myocarditis cases can be fatal within five years.** It is unwise to expose small children to higher risks of heart attacks, strokes and other cardiovascular events which can kill or make them ill or seriously disabled, or cut their lives short. This does not serve the Public Interest and the Common Good. This is a disgrace and the people exposing Irish children to such dangers are motivated by more and more profits, vast wealth, financial gain.

The Constitutional High Court needs to weigh up these two factors. Between zero children dying of covid19, and the other factor where thousands of children are put at significant risk of serious illness, disabilities or death from taking these covid19 vaccines. And the court must also weigh up the fact that parents and children are NOT given an opportunity to weigh up these two choices as they are deprived of vital information.

This case involves significant risk to the lives and health of thousands of Irish children and is an issue of great importance to the Public Interest and for the Common Good and to the Irish nation as a whole and it needs to be heard in the Constitutional High Court and should not be blocked or impeded by prohibitive costs.

- xx. The risks versus benefits for the covid19 vaccines for children was measured in the affidavit we filed in the High Court in January 2023. This clearly shows that the risks are far higher than the benefits. Yet this information has NOT been communicated to parents and guardians of children by the Irish government and health authorities. Since covid19 vaccinations began for small children in 2022 the Irish government and health authorities have not communicated the up to date risks and dangers of these vaccines to the parents and guardians of children and members of the general public. This is not full and valid informed consent.
- xxi. full knowledge of safe and effective medicines for treating, curing and preventing covid19 infections available since May 2020 which act as an alternative to covid

vaccines and boosters. This information was not provided to vaccine recipients and the general public.

- xxii. knowledge of Causality, that being the fact that the covid19 vaccines are causing and have caused a big rise in excess mortality and a big rise in mortality in all highly covid vaccinated countries in 2021, 2022 and 2023. This is detailed in our affidavits in November and December 2022 and January 2023 and in 'Exhibit 150 Grounds for Causality' which is the Grounds for Causality document to be presented to the High Court.
- xxiii. The grounds for fraud and obtaining informed consent by fraud and deception are laid out in the document 'Book of Authorities for Fraud' to be presented to the High Court. These frauds are also detailed in our affidavits in November and December 2022 and January and statement of truth in 2023. This is serious and involves the use of fraud and deception to get informed consent from people for covid19 vaccines.

Full and valid Informed Consent cannot be given by parents who are deprived of these important and vital facts and evidence about these covid vaccines and boosters.

## 6. Court Precedents dealing with Informed Consent

We cite many court precedents from courts in Ireland, Britain, Europe, and North America to support our claim of the deprivation of full and valid informed consent. Firstly, I cite the **6 Dunne Principles** which emerged from Dunne v. National Maternity Hospital which was argued before the Irish Supreme Court. In its recent decision in 2019 in the case of Ruth Morrissey and Paul Morrissey v Health Service Executive, Quest Diagnostics Incorporated and Medlab Pathology Limited the Supreme Court has affirmed that the Dunne Principles remain the appropriate legal test for establishing liability in medical negligence litigation in Ireland. I cite number 6 of the 6 Dunne Principles

*'It is not for a jury (or for a judge) to decide which of two alternative courses of treatment is in their (or his) opinion preferable, but their (or his) function is merely to decide whether the course of treatment followed, on the evidence, complied with the careful conduct of a medical practitioner of like specialisation and skill to that professed by the defendant...'*

The 6 Dunne Principles define medical negligence and are highly relevant in our court case. Negligence on the part of medical doctors and medical professionals, and those people and bodies who approved, authorized, distributed the vaccines and vaccinated many thousands of people with covid19 vaccines and boosters without providing them with full disclosure and without obtaining full and valid informed consent. As regards proper standards, thousands of highly qualified and highly experienced medical



doctors have officially condemned the experimental covid19 vaccines given to the general public and they refused to administer them to people and they have called for the ending of these vaccinations, and this is detailed and referenced in our affidavits, exhibits, statement of truth and books of evidence filed in the High Court for this court case. The deliberate censorship of medical doctors by government and certain medical bodies did not prevent these medical doctors from standing up for medical and scientific truth, and this in itself points to the bravery, courage, honesty and integrity of these medical doctors and medical professionals. And it is the medical and scientific truth expressed by these brave and honest medical doctors and medical professionals which applies in this High Court case.

Full Disclosure is a medical standard going back thousands of years, and is still a standard in today's medicine. The medical doctors and medical professionals have stated that the proper standard of medical care for the general public involves full disclosure including disclosure of injuries, illnesses, disabilities and deaths caused by the covid19 vaccines and boosters, and the published scientific studies and scientific literature about this, and the internal Pfizer documents about this and those of other covid19 vaccine companies, and the cost-benefit analysis for these vaccines for specific age groups and all age groups, and the uncensored professional medical opinion of medical doctors about this including examples of what they are seeing in their own medical practices and emergency rooms in hospitals, and all other forms of disclosure most of them mentioned in our affidavits, exhibits, statement of truth and books of evidence. This is the standard set by the 6 Dunne Principles and by the Irish Supreme Court in *Dunne v. National Maternity Hospital*.

The 6 Dunne Principles certainly apply in circumstances where there has been mass vaccinations of experimental covid19 vaccines which have been proven to be unsafe and ineffective and for which official government databases worldwide such as VAERS, V-Safe, DMED, Eudravigilance, MHRA can attest to, and over 1,000 published peer reviewed studies can attest to, and Pfizer's own internal documents can attest to, and for which the large rise in excess deaths including hundreds of thousands of deaths and millions of injuries, illnesses and disabilities worldwide can attest to, and this provides an excellent example of medical negligence and/or medical fraud. And information about the material risks were not communicated to covid19 vaccine recipients. And information about ineffectiveness against new strains of covid19 were not provided. This medical negligence and/or fraud on the part of the HSE, the chief medical officer, the Minister and Department of health, NPHET, NIAC, and vaccinators is grounds alone for ending this covid19 vaccination programme. Placing the general public in significant danger involves elements of negligence, malpractice and fraud in this case.

The Supreme Court precedent set in *Dunne v. National Maternity Hospital* which includes the 6 Dunne Principles binds the other courts including the High Court in terms of case law and court precedents, and provides clear direction for the High Court for an adjudication in our favour in this court case.

The material risks were deliberately not disclosed to the vaccine recipients and to the general public. This is a legal fact, a scientific fact, a medical fact and an historical fact, and has a huge bearing on this case and on the Irish people and nation. People who received the covid19 vaccine or who may consider receiving these covid19 vaccines in future attach great significance and importance to their own health and well being and to anything including drugs or vaccines which could seriously harm or damage their health, cause illness or disability, interfere with their privacy or cause death, and this includes harms, injuries, disabilities and deaths caused by the covid19 vaccines. Yet they were deprived of this significant information detailing the material risks involved.

On this important legal requirement of Disclosure of Material Risks and the issue of significance to the person receiving the medical procedure, I will cite a number of important court precedents. In defence of our claim before the court, I cite the legal precedent of *Montgomery vs Lanarkshire Health Board* from the Supreme Court in the UK which is relevant in our case. This *Montgomery* case is a landmark case in the area of informed consent internationally. In this Supreme Court case, the judgment stated that doctors must provide information about all material risks; they must disclose any risk to which a reasonable person in the patient's position would attach significance. Doctors must share all such material risks, as well as any to which it would be reasonable for them to think the individual patient would attach significance. It established that, rather than being a matter for clinical judgment to be assessed by professional medical opinion, a patient should be told whatever they want to know, not what the doctor thinks they should be told. I emphasise the words "all material risks" and significance in this Supreme court judgment. They most certainly apply in our High Court case.

'The test of materiality is whether, in the circumstances of the particular case, a reasonable person in the patient's position would be likely to attach significance to the risk, or the doctor is or should reasonably be aware that the particular patient would be likely to attach significance to it.' The onus is on the medical doctor and medical council and NPHET and the chief medical officer to disclose this information to people before giving them a vaccine or drug or medical procedure.

The precedent set by *Montgomery vs Lanarkshire Health Board* was used to decide *Spencer v Hillingdon NHS Trust* in April 2015 in Britain where important and material information was not disclosed to a person before undergoing a medical procedure.

Yes indeed, Irish people attach great significance to the material risks and dangers posed by these covid19 vaccines including serious illnesses, disabilities and deaths and also to the evidence showing the ineffectiveness of these vaccines against covid19 variants and to the antibody dependent enhancement caused by these vaccines which weaken human immune systems. Great significance is attached to this by everybody. Yes all this was and is of great significance to vaccine recipients and to members of the general public and to the courts. But sadly, the Irish government, NPHET, the chief medical officer, the

health authorities and the vaccinators refused to disclose this information to vaccine recipients and to the general public. The precedent set by *Montgomery vs Lanarkshire Health Board* in the Supreme court in Britain applies in this court case.

In fact, the Irish government, NPHET, the chief medical officer, the health authorities and the vaccinators deliberately concealed this important and material information about the covid vaccines. And have continued to do so up to the present. And they put a gun to the heads of doctors in Ireland to reinforce this concealment. And also used censorship of the press and media to reinforce this concealment. This was a deliberate and calculated attack on informed consent, and succeeded in depriving people of important and material information, and informed decision making, and informed consent. This was and is illegal, unlawful and unethical.

In defence of our claim before the court, I cite *Walsh v Family Planning Services Ltd* in the Irish Supreme Court, where the principle of informed consent was firmly upheld by the Supreme court judges. It was judged that

- (i) there is a general duty to inform patients of any possible harmful consequences arising from a medical procedure
- (ii) that a warning must be given in every case of a risk, however remote, of grave consequences involving severe pain continuing into the future and involving further medical intervention
- (iii) in elective treatment the duty to disclose risks is higher than in non-elective treatment. Vaccinations constitute elective treatment.
- (iv) That the standard to be applied to cases where the issue of disclosure is at issue is the same as was enunciated by the Supreme Court in the *Dunne* case.

In defence of our claim before the court, I cite the following case precedent - *Re a Ward of Court* (withholding medical treatment) (No. 2) [1996] 2 IR 79, Justice Denham at p. 156. Stated "Medical treatment may not be given to an adult person of full capacity without his or her consent.....This right arises out of civil, criminal and constitutional law. If medical treatment is given without consent it may be trespass against the person in civil law, a battery in criminal law, and a breach of the individual's constitutional rights. The consent which is given by an adult of full capacity is a matter of choice. It is not necessarily a decision based on medical considerations. Thus, medical treatment may be refused for other than medical reasons ... the person of full age and capacity may make the decision for their own reasons."

This judgment reaffirms the central role of informed decision making by the individual leading to informed consent.

In defence of our claim before the court, I cite the following 5 cases as precedents.

In *Geoghegan vs Harris* (2000), the High Court in Ireland upheld the need for medical professionals to provide information about all material risks to patients. This was an important judgment and established the relationship between a medical professional providing information about all material risks and the gaining of informed consent from a patient.

In *Bolton vs Blackrock Clinic* (1997), the High Court in Ireland upheld the need for informed consent and for medical professionals to inform patients about risks involved in medical procedures.

In *Fitzpatrick vs White* (2007) the Irish Supreme Court ruled that information of material risks can be communicated to a patient at a late stage in a medical procedure, and informed consent attained. Once the material risks are communicated and the person is in a fit state to make a decision, then this is valid according to the Supreme Court. So up until the point a person sticks the vaccine needle into a person's arm, they still have the option to be fully informed about all material risks and dangers by the vaccinator or doctor or nurse.

In *Amanda Fogarty vs The Rotunda Hospital* before the High Court in Ireland in 2008, it was found that a Ms Fogarty was not warned about the risks of a medical procedure and that this led to serious consequences for her baby. She was awarded compensation. This points out the vital role of providing information about material risks associated with any medical procedure. This includes covid19 vaccines in our case.

The Minnesota Supreme Court case of *Mohr vs Williams* in 1905 and the Illinois Supreme Court case of *Pratt vs Davis* in 1906 established the ground rules for informed consent in the US and internationally. If a medical professional withholds material information from a patient they can be sued for assault and battery. These court precedents have been cited in courts in Ireland and Britain. The Oklahoma Supreme court case of *Rolater v Strain* in 1913 was another landmark US case and it stated that the informed consent of a patient was vital to any medical procedure. And that any procedure without this consent was wrong, unlawful and illegal. The case of *Schloendorff v. Society of New York Hospital*, decided in the New York Court of Appeals in 1914 re-affirmed these other court rulings and the importance of fully informed consent as opposed to the presumptions of medical professionals and so called "experts".

In the ruling, Judge Benjamin Cardozo wrote, "Every human being of adult years and sound mind has a right to determine what shall be done with his own body; and a surgeon who performs an operation without his patient's consent commits an assault, for which he is liable in damages." Another landmark case around informed consent was *Salgo vs Leland Stanford Jr. University Board of Trustees* argued before the Court of Appeals in California in 1957 where disclosure was determined to be the key factor involved in informed decision making leading to informed consent. Non disclosure constituted a crime against the person. This has been cited in courts across North America, Europe and Ireland.

The European Court of Justice (ECJ) made an important and recent ruling on vaccine injuries in 2017, which is relevant to our court case. In *N.W. v. Sanofi Pasteur MSD SNC*, the ECJ ruled that the national courts must take into account the medical evidence provided by the vaccine injured and their testimony stating that this injury, illness or death occurred in a previously healthy person with no history of such illness immediately after or shortly after getting the vaccine. And that the vaccine is the only reasonable cause of such an illness or death. And there is a clear temporal relationship between getting the vaccine and suddenly developing a new illness or dying which cannot be explained by any other factor. The ECJ stated that a national court may consider “serious, specific and consistent evidence” regarding a vaccine defect, even if medical research has not yet established or ruled out a connection. The ECJ also made a finding that a medical consensus is not necessary to rule in favor of the plaintiff when other compelling evidence is present.

The ECJ stated that this type of case comes within the remit of Articles 4 and 6 of EU Directive 85/374, which deals with defective products including defective vaccines which can cause many injuries, illnesses, disabilities and deaths. The ECJ noted that if the only method of proof a plaintiff can rely on is medical research, it would be “excessively difficult” or “impossible to establish producer liability,” and would undermine the Directive’s core principle of corporate liability. The ECJ instructs national courts that to find in favor of a plaintiff, they must find the plaintiff’s evidence “sufficiently serious, specific and consistent to warrant the conclusion that a defect in the product appears to be the most plausible explanation for the occurrence of the damage, with the result that the defect and the causal link may reasonably be considered to be established. The ECJ goes on to say that the vaccine injured have a strong case where “the vaccine is the most plausible explanation” for the disease onset and where, under Article 6, the product “causes abnormal and particularly serious damage to the patient who, in the light of the nature and function of the product, is entitled to expect a particularly high level of safety.” This is reinforced by the fact that the vaccine dangers and risks were not communicated to the vaccine recipients so that they could make fully informed decisions and provide their full and valid informed consent. This is creating an epidemic of vaccine injured throughout Europe and other parts of the world.

The evidence of harms caused by the covid19 vaccines worldwide shows that these vaccines and those people who manufacture, approve, promote, distribute and inject them are in breach of Articles 4 and 6 of EU Directive 85/374 and the ECJ ruling in *N.W. v. Sanofi Pasteur MSD SNC*, and this is relevant to our court case. Also those people who manufacture, approve, promote, distribute and inject these covid vaccines may be subject to being sued in the civil courts and criminal courts of Europe. And the lack of disclosure of material risks and dangers of vaccines plays a major role in this, and in our court case and will play a major role in other legal cases. Nobody has the right to poison populations of people and conceal and hide this material fact. All persons are equal before the law under the Irish Constitution and

Irish and European laws.

So there is a general agreement across international jurisdictions as to the necessity for full disclosure of information to the person for the purpose of fully informed decision making which leads to full informed consent. We cannot rely on the presumptions of medical professionals or so called “experts” or government advisors who presume themselves to know everything and to be always right and have conflicts of interest.

I further say there is one other important court precedent regarding informed consent which applies in our high court case. The case of ***Canterbury v. Spence*** (464 F.2d. 772, 782 D.C. Cir. 1972) in the USA was a landmark federal case decided by the United States Court of Appeals for the District of Columbia Circuit that significantly reshaped malpractice law in the United States and internationally. It established the idea of "informed consent" to medical procedures. The major legal implication of the decision was that it largely shifted the culture from a ‘professional practice standard’ to a ‘reasonable person standard’ in malpractice cases. This was a very similar verdict to that of *Montgomery vs Lanarkshire Health Board* in the Supreme Court in the UK in 2015. Both courts used the ‘reasonable person standard’ and what a reasonable person felt was important and significant in terms of disclosure by the medical professional. Both cases are relevant to our High court case as there has been non disclosure of the material risks and dangers of covid19 vaccines, and the results have been catastrophic for many vaccinated people and their families.

A recent court case in the USA, illustrates this point. Donna and Dennis Lawhead sued Dr. Jan Paul Muizelaar and the UC Regents for medical malpractice in the Superior Court in California. The Lawheads also alleged dependent adult abuse, battery, fraud, negligent misrepresentation and loss of consortium. The surgeon was successfully sued and removed from his position at UC Davis for non disclosure of important and significant information to the patient. News report below

<https://www.courthousenews.com/uc-regents-face-big-problems-from-doc>

and

<https://web.archive.org/web/20160202041826/http://www.sacbee.com/news/investigations/article2578591.html>

**I say that a recent judgment of the Supreme Court of New York in the USA has created a precedent which is 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.

## **7. The Court Precedents set and International Law regarding Unlawful and Illegal Experimentation on People**

It should be pointed out here to the High Court that the Pfizer covid19 vaccines are in Phase 3 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 experiments. Indeed the covid19 vaccines were rushed into production inside 6 months without proper safety tests on humans and animals. It normally takes 5 - 10 years to carry out proper tests on new vaccines and drugs. The Pfizer vaccines use mRNA technology and spike proteins which are new and the medium term and long term safety of these type of vaccines are unknown. And this has been admitted to by the vaccine companies themselves. Though the short term risk and dangers are known and present a significant threat to public health.

I will now cite precedents from the past which relate to risky experimentation on human beings. The Doctors Trial which was part of the Nuremberg trials of 1946 to 1947 serves here as a legal precedent for our court case. This involved the trial of nazi medical doctors and scientists who carried out experiments on people without their full and valid informed consent and without their permission. Twenty of the twenty-three defendants were medical doctors and were accused of having been involved in Nazi human experimentation and mass murder . The indictment was filed on 25<sup>th</sup> October 1946; the trial lasted from 9<sup>th</sup> December that year until 20<sup>th</sup> August 1947. Of the 23 defendants, seven were acquitted and seven received death sentences; the remainder received prison sentences ranging from 10 years to life imprisonment. This case set an important legal precedent internationally around informed consent and bodily integrity which is relevant today. The hundreds of thousands of people killed by the experimental covid19 vaccines and the millions of people suffering illnesses and disabilities from these vaccines today present a situation quite similar to the one which led to the creation of the Doctors Trial in Nuremberg from 1946 to 1947. And coercion was used in these covid19 vaccinations in the form of vaccine mandates in certain sectors of the economy and the use of vaccine passports to deny entry into certain businesses, public buildings and family homes and for international travel.

The Nuremberg Code emerged from these Nuremberg Trials. The Nuremberg code is binding in Ireland and the European Union. There have been several breaches of the Nuremberg code in relation to the giving of covid19 vaccines to people. I cite the following from the Nuremberg code

“.. the person involved should have legal capacity to give consent, should be so situated as to be able to exercise free power of choice, without the intervention of any element of force, fraud, deceit, duress,

overreaching or other ulterior form of constraint or coercion; and should have sufficient knowledge and comprehension of the elements of the subject matter involved as to enable him to make an understanding and enlightened decision”

The Nuremberg code form part of medical ethics and scientific research ethics for over 70 years. We have detailed the breaches of the Nuremberg code in one of our books of evidence which can be viewed on the Internet. These breaches alone should be grounds for closing down the vaccine programme.

The Nazis were not the only government to experiment on people without their informed consent. Unfortunately many supposedly democratic governments illegally carried out experiments on their own citizens, killing, disabling and maiming many people over several years and decades.

On this substantive issue of lack of informed consent and illegal experiments by governments and big business I draw the courts attention to the Tuskegee experiment in the USA which lasted from 1932 to 1972. In this experiment the US government and Public Health Service and CDC and medical doctors carried out illegal and unconstitutional experiments on 600 African Americans and many of them died and suffered serious injuries from this experiment. Full disclosure was not given to these African Americans and their full informed consent was not given. Though alleged informed consent was attained by deception, lies and manipulation.

On May 16th, 1997, President Bill Clinton formally apologized on behalf of the United States government to victims of the experiment, calling it shameful, criminal and racist. The MK-Ultra program run by the US government and CIA from 1953 to 1973 carried out illegal experiments using illegal drugs, vaccines, electroshocks, physical and sexual abuse and torture against thousands of American citizens and many died. This was exposed by the US Congress in the Church Committee hearings in 1975.

In the year 2000 an Irish government "Report On Three Clinical Trials Involving Babies And Children In Institutional Settings, 1960/61, 1970 and 1973" stated that illegal experiments had been carried out on young children in several mother and baby homes and industrial schools in the 1960's and 1970's. This involved vaccines and drugs. No informed consent was given. Files regarding deaths, injuries and disabilities caused by this have not been released to the public. From 1930 to 1935 we had the Burroughs-Wellcome trials in mother and baby homes and industrial schools and orphanages in Ireland where many hundreds of young children were experimented on with vaccines. The files on this have not been made public. According to the Final Report of the Commission of Investigation into Mother and Baby Homes in Ireland there were **13 vaccine trials involving over 43,000 children in Ireland** between 1922 and 1998. The commission found that these trials would have been a breach of the Nuremberg Code.

A few decades later in the 1980's and 1990's people came forward stating that they has been seriously injured and disabled in these vaccine trials. The Tribunals and Investigations into Child abuse in



institutions in the late 1990's and early 2000's revealed an appalling level of illegal medical experimentation on thousands of children in mother and bay homes, industrial schools and orphanages and files and statistics about deaths, illnesses and disabilities were not disclosed to the general public. The Irish government and health authorities had presumed that these children were expendable and could be killed off or seriously injured and disabled and nobody would notice. This attitude by the Irish government and by senior civil servants, the health authorities, and some medical doctors continues to this day and is one which this court and other courts in Ireland will have to scrutinise very closely to reveal the extent of deaths, illnesses and disabilities caused by continuing medical experiments and the appalling lack of informed consent.

Next I refer the court to the Willowbrook State School in Staten Island, New York, USA where hundreds of disabled children were deliberately infected with deadly viruses and bacteria for over 2 decades by state and federal authorities. Many children from this and hundreds were left with illnesses and disabilities. In the late 1980's and during the 1990's, thousands of young children in orphanages and state institutions in the USA were given experimental AIDS drugs by medical doctors, scientific researchers working for Big Pharma companies and the NIH, and over 500 children were murdered by these experiments. Some of these drugs were forcefully administered to the children. There was no informed consent. The state and federal government and the NIH working with Big Pharma companies and the so called "experts" played a role in this murder of children and the maiming and disabling of them.

During world war 2, the Japanese government set up Unit 731 to carry out thousands of illegal medical experiments on Chinese and other Asian peoples using drugs, vaccines, operations and torture, and this led to thousands of deaths and serious disabilities. In 1946 to 1948 a study in Guatemala, U.S. researchers infected hundreds of people including children using syphilis and other sexually transmitted diseases. In 1956 and 1957, several U.S. Army biological warfare experiments were conducted on the cities of Savannah, Georgia and Avon Park, Florida. It involved insects carrying Yellow fever and dengue. Thousands of people became very ill, and some died.

In 1986 the United States House Committee on Energy and Commerce released a report entitled American Nuclear Guinea Pigs : Three Decades of Radiation Experiments on U.S. Citizens. This detailed how US citizens were used in nuclear experiments without their knowledge. In 1995 President Bill Clinton apologised to the many victims of these experiments, and compensation programs were put in place. And there are many more examples of governments carrying out illegal experiments on their own populations, including not disclosing to people the risks involved and not getting the full informed consent of the people involved. Yes, unfortunately we still have the nazis and nazi experiments and the nazi mentality in the modern world.

So we have evidence that governments working with Big Pharma companies and big arms companies do carry out unlawful, illegal and unethical experiments on their own populations and this has been occurring for many decades. Governments cannot be trusted, that is why we have Constitutions to make governments accountable and make politicians accountable. Governments do not always act in the best interests of the people and they do not serve the common good and the public interest, this fact must be stated and re-stated to this High court and to other courts and to the general public over and over again. There is a duty on all of us to make governments fully accountable to the people, the nation and the Irish Constitution. Some elected politicians and senior state employees have done this consciously in full knowledge of what they were doing and have financially benefitted from it, while others do it but conceal it so as to avoid detection and prosecution, and others do it because they are threatened by their superiors and are just “following orders” while others do it unconsciously from a point of ignorance and absolute submission to the so called “experts”. Many of these so called “experts” had conflicts of interest and profit motives which were undisclosed to the general public and this continues in the present day.

These aforementioned Governments in the past claimed or alleged they carried out these illegal, unlawful and unethical experiments for the common good and in the Public Interest. I would ask this High court to carefully examine, critically analyse, and re-evaluate what exactly is meant by the common good and the public interest in the context of experimentation on people with vaccines, drugs or medical procedures where full disclosure is not given, full and valid informed consent is not obtained and significant numbers of deaths, illnesses and disabilities occur.

## **8. More Court Precedents and Breaches of Constitutional rights and Human Rights laws**

The HSE breached its own National Consent Policy states that:

*“The provision of information and the seeking and giving of consent should involve a continuing process of keeping service users up to date with any changes in their condition and the interventions proposed. It should not be a once-off, sometimes ‘eleventh hour’ event, exemplified by getting a hurried signature on a consent form.”*

*HSE National Consent Policy (HSE, May 2013) para 7.3.*

The HSE failed to keep up to date with the deaths, injuries, illnesses and disabilities caused by the covid19 vaccines and failed to update vaccine recipients and members of the general public. And they failed to report on vaccine ineffectiveness over time, particularly against variants. And failed to inform about the role of covid vaccine induced Antibody Dependent Enhancement in this. And this same HSE was totally disinterested in the ingredients of the covid19 vaccines. This was and continues to be an appalling failure in their duty of care to the Irish people and nation.

Examining the HSE web site at <https://www2.hse.ie/screening-and-vaccinations/covid-19-vaccine/get-the-vaccine/covid-19-vaccination-for-children/>

which is promoting covid19 vaccines for children reveals many errors and omissions including failure to disclose vaccine deaths, injuries, illnesses and disabilities and the lack of lasting effectiveness of these vaccines. It also fails to state that no children died of covid19 and the risk of children dying from it is less than from colds and flus according to the scientific evidence. The HSE falsely claims that the vaccine stops spread. This is a lie and confirmed by testimony by a Pfizer executive before the European Parliament in October 2022. The HSE mentions that children with a health condition should get the vaccine but this fails to mention the many illnesses and disabilities this vaccine could give such children, thus adding to their burden of illness. This shows an appalling ignorance on the part of the HSE. There is no evidence the covid19 vaccine stops a person from becoming severely ill with covid19, in fact the opposite is true, as it leaves them more vulnerable to covid19 variants which can be milder or worse than the original virus. This being due to antibody dependent enhancement or immune priming.

The PIMS condition in children can be caused by many viruses and bacteria including common colds and flus yet no vaccine is recommended for them for children. The immune system dysfunctions and damage done by the covid19 vaccines may cause PIMS or aggravate it further if already present. At the end of the web page, the HSE finally admit that covid19 vaccines can cause myocarditis or pericarditis in children and yet they continue to promote it. The figures they supply are outdated and show a lower risk than the real risk identified in Thailand and other places. The real risk is much higher and subclinical heart conditions and abnormalities of 29% for children in the Thailand study should have been presented on the HSE web site. The HSE should not be placing the lives of many children at increased risk of myocarditis and pericarditis and serious heart conditions for a covid19 virus which killed no child during the pandemic and has a very low risk of death for children, lower than colds and flus. This is an outrageous abuse of authority by the HSE. Children's lives are being put at risk.

Further deficiencies in the HSE's literature around disclosure and informed consent for these vaccines are detailed in our affidavit filed in the High Court in November 2022.

In the Court of Appeal case *Re T (Adult: Refusal of Treatment)* (C.A.) [1993] Fam. 95 in the UK, Lord Donaldson stated the following about written forms of informed consent

"It is clear that such forms are designed primarily to protect the hospital from legal action. They will be wholly ineffective for this purpose if the patient is incapable of understanding them, they are not explained to him and there is no good evidence (apart from the patient's signature) that he had that understanding and fully appreciated the significance of signing it. With this in mind it is for consideration whether such forms should not be redesigned to separate the disclaimer of liability on the part of the

hospital from what really matters, namely the declaration by the patient of his decision with a full appreciation of the possible consequences, the latter being expressed in the simplest possible terms...”

The judge stated that written consent is not the primary factor. The main factor is that the patient must be fully informed about consequences. This includes the right to refuse a medical procedure based on the information received about risks. This is highly relevant in our High Court case where the general public were deliberately kept ignorant about consequences. .

In another court precedent to support our case, *Mordel v Royal Berkshire NHS Trust* in the High Court in the UK, the judgment stated that there is a legal duty of care on the part of medical professionals to communicate clearly, precisely and honestly with patients in respect of medical procedures and to ensure that patients make an informed decision and provide their informed consent. There are no valid grounds for non disclosure of material risks or covering up such risks. This same legal principle applies in Ireland and was breached by those who approved and administered the covid19 vaccines.

In another court precedent, *Sidaway v. Governors. of Bethlem Royal Hospital [1985] at p. 882. Lord Scarman further elucidated the doctrine of informed consent*

“The existence of the patient's right to make his own decision, which may be seen as a basic human right protected by the common law, is the reason why a doctrine embodying a right of the patient to be informed of the risks of surgical treatment has been developed in some jurisdictions in the U.S.A. and has found favour with the Supreme Court of Canada. Known as the "doctrine of informed consent," it amounts to this: where there is a "real" or a "material" risk inherent in the proposed operation (however competently and skilfully performed) the question whether and to what extent a patient should be warned before he gives his consent is to be answered not by reference to medical practice but by accepting as a matter of law that, subject to all proper exceptions (of which the court, not the profession, is the judge), a patient has a right to be informed of the risks inherent in the treatment which is proposed.”

The mantra promoted by the censored Irish press and media and by the Irish government and health authorities was that the covid19 vaccines were “safe and effective” and “stop the spread”. This propaganda has been broadcast continuously in the press and media for the last 2 years, and it has unduly influenced and manipulated most of the general public. Any person or medical professional or scientist who tried to present the facts and evidence about the vaccine risks and vaccine ineffectiveness over time has been prevented air time and press time, and been blocked. The scientific, medical and statistical evidence gathered by us, and presented in the books of evidence show that this message of “safe and effective” to be false and a lie. The vaccinators and vaccine approvers in government tried to

obtain the informed consent of people by denying them the material facts and evidence about vaccine risks, vaccine deaths, injuries, illnesses and disabilities while dosing them continuously with propaganda in the press and media.

## **9. Breaches of the Natural Law as understood by the Irish Constitution and previous findings and judgments of the High Court and Supreme Court**

I further say that this denial of full and valid informed consent involves serious breaches of the **Natural Law** which is the highest form of law and is recognised as such in the Irish Constitution and in several Irish High Court and Supreme Court cases and judgments. And the superior courts have found that the Natural Law is intrinsically related to the unenumerated rights of the Irish people and the Fundamental rights of the Irish people in the Irish Constitution. And is also recognized as such in British, American, Australian and European superior courts. Natural Law predates and is superior to Constitutional law and to positive law created by politicians. Natural Law includes our **inalienable rights and imprescriptible rights**, which are rights we are all born with, which are innate, and which cannot be denied to us by laws created by politicians or statutory instruments or policies enforced by politicians, especially unaccountable politicians. The Irish Constitution describes our Natural Law rights as ‘inalienable and imprescriptible rights, antecedent and superior to all positive law’, and the superior courts have also described these as unenumerated rights. The government or elected politicians cannot take away inalienable and imprescriptible rights, whether through lockdown laws or vaccine mandates / passports or statutory instruments or any other laws. These inalienable, antecedent, imprescriptible and unenumerated rights include the right to freedom of travel, the right to bodily integrity and not be injured, made ill or killed by experiments including experimental vaccines, the right to full and valid informed consent for experimental vaccines and drugs, the right to redress in the courts including injunctions to stop unsafe experimentation, including vaccines, on the people of Ireland, the right to life and not to be killed by experiments, the right to liberty without being forced or manipulated into taking experimental vaccines, the right to freedom of religion, to freedom of speech, freedom of the press and freedom of expression, to freedom to earn an honest living, freedom of assembly and freedom of conscience, and lastly the right to due process under law, to equality of arms under law, to a fair hearing and a fair trial without being blocked by oppressive costs. These inalienable, antecedent, imprescriptible and unenumerated rights and Natural Law rights cannot be blocked, perverted or undermined by anyone and any attempt to do so is a serious breach of the Natural Law, the Irish Constitution, and is a crime.

This High Court case revolves around the Substantive issue of Accountability by elected politicians, the executive and the civil service, and the urgent need for full accountability by these same parties, so as to protect 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 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.

Under the Irish Constitution, 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, and thus directly affect the Fundamental rights of the people of Ireland as defined in articles 40 to 44 in the Irish Constitution, and their Natural Law rights and unenumerated rights. This is a matter of huge Public Interest.

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.

This issue of accountability is for all branches of government, including the judiciary and the High Court and Supreme Court. These serious breaches of the Constitutional rights, Natural Law rights and unenumerated rights of the Irish people and the lack Accountability of government and health authorities must be addressed in the superior courts and in the criminal courts.

The Natural Law rights are cited in the Irish Constitution and superior court judgments in Ireland and is highly relevant in this court case. Many Constitutions in democracies worldwide were derived out of Natural Law which existed long before such Constitutions. The English Constitution, Irish Constitution and many other Constitutions have affirmed the pre-existence and supremacy of Natural Law.

Blackstone, the famous British judge, jurist and legal writer says that:

'this law of nature, being coeval with mankind and dictated by God himself, is of course superior in obligation to any other. It is binding over all the globe, in all countries, and at all times: no human laws are of any validity, if contrary to this; and such of them as are valid derive all their force, and all their authority, mediately or immediately, from this original'

The US Declaration of Independence in 1776 derived it's authority from Natural law, and contains references to Natural Law. The Irish Proclamation of Independence in 1916 and the formation of the first Dail (Irish parliament), the first Constitution of the Dail 1919-21, the Declaration of Irish Independence by the Dail and the Democratic Programme of the First Dail all derived their authority from Natural Law and used it to justify themselves. Constitutions have tried to codify some of the Natural law, such as the Bill of Rights and the First Amendment to the Constitution in the USA and the first Constitution of the Dail 1919-21, the Free State Constitution of 1922, and the 1937 Constitution in Ireland. The US Declaration of Independence in 1776 declared that the Laws of Nature and of God give nations and peoples their democratic rights, human rights and freedoms. And that these rights are inalienable.

Natural Rights are widely seen and interpreted as Universal and apply to all of humanity. The UN Declaration of Human Rights refers to Natural Law in it's preamble and attempted to codify some of the Natural Law. Article 40.3 of the Irish constitution refers to and accounts for the recognition of unenumerated rights, which derive from the Natural Law. For approximately 50 years, as a result of these unenumerated rights, the Irish courts have engaged in a process of enumerating constitutional rights,

often by reference to the Natural Law.

**The Natural Law has been upheld in courts in Ireland, Europe and North America for over 250 years. The Natural Law was first widely recognized during the Enlightenment in Europe in the 1700's, but the Natural Law has existed for thousands of years and has been cited in ancient religious, spiritual, legal and philosophical texts and writings. Natural Law, in the form of fundamental rights and unenumerated rights, has been upheld many times in the courts.**

Court precedents and examples include 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

In McGee v. The Attorney General, Justice Walsh acknowledged that natural rights are not created by law but that the Constitution confirms their existence and gives them protection. The Constitution itself concedes their existence:

'Articles 40, 41, 42 and 44 of the Constitution all fall within that section of the Constitution which is titled "Fundamental Rights." Articles 41, 42 and 43 emphatically reject the theory that there are no rights without laws, no rights contrary to the law and no rights anterior to the law. They indicate that justice is placed above the law and acknowledge that natural rights, or human rights, are not created by law but that the Constitution confirms their existence and gives them protection. The individual has natural and human rights over which the State has no authority; and the family, as the natural primary and fundamental unit group of society, has rights as such which the State cannot control. ... Both in its preamble and in Article 6, the Constitution acknowledges God as the ultimate source of all authority. The natural or human rights to which I have referred earlier in this judgment are part of what is generally called the natural law. There are many to argue that natural law may be regarded only as an ethical concept and as such is a re-affirmation of the ethical content of law in its ideal of justice. The natural law as a theological concept is the law of God promulgated by reason and is the ultimate governor of all the laws of men. In view of the acknowledgment of Christianity in the preamble and in view of the reference to God in Article 6 of the Constitution, it must be accepted that the Constitution intended the natural human rights I have mentioned as being in the latter category rather than simply an acknowledgment of the ethical content of law in its ideal of justice.'

In McGee v Attorney General, Justice Walsh also took the view that

' In this country it falls finally upon the judges to interpret the constitution and in doing so determine... the rights which are superior or antecedent to positive law or which are imprescriptible and inalienable '



In *Ryan v Attorney General* [1965] IR 294, Justice Kenny said:

“Natural law is both anterior and superior to positive law or man made law. There are many personal rights of the citizen which follow from the Christian and democratic nature of the State which are not mentioned in Art 40 at all.”

This view was adopted and expanded in *State (Healy) v Donoghue* where Justice Gannon noted, the existence of Natural Law rights:

“Which are anterior to and do not merely derive from the Constitution.”

Mr. Justice Costello made an important point about Natural Law several years after the *McGee v. The Attorney General* case:

' It has more than once been judicially observed that it can clearly be inferred that the Constitution rejects legal positivism as a basis for the protection of fundamental rights and suggests instead a theory of natural law from which those rights can be derived. '

Source: “Natural Law, the Constitution and the Courts” in Lynch and Meenan eds, *Essays in Memory of Alexis Fitzgerald*(The Incorporated Law Society of Ireland, 1987) 105, at 109.

In *AM v Refugee Appeals Tribunal*, Justice McDermott stated:

' Freedom of individual conscience underpins many of the democratic values and fundamental rights of the Constitution. The right to vote, to participate as a candidate in any form of election, the rights to freedom of expression, association and assembly and religious freedom are all dependent on the freely exercised will and conscience of the individual. Though it is not recognised as a separate fundamental right under the Constitution, it is clearly part of the constitutional fabric and, as such, is, I am satisfied, an unenumerated right guaranteed by Article 40.3 of the Constitution '

In *NHV v Minister for Justice*, Justice Donnell stated:

' a right to work at least in the sense of a freedom to work or seek employment is a part of the human personality and accordingly the Article 40.1 requirement that individuals as human persons are required be held equal before the law, means that those aspects of the right which are part of human personality'

In *Merriman v Fingal County Council*, the High Court (Barrett J) made reference to a number of international conventions, including the Aarhus Convention and the European Convention on Human Rights, in identifying an unenumerated 'right to an environment consistent with human dignity and the well-being of citizens at large'. Similarly, in *Carter v Minister for Education and Skills*, the High Court (Humphreys J) cited the Universal Declaration of Human Rights, the ICESCR and the Charter of Fundamental Rights of the European Union in finding that an unenumerated right to third level education

existed as a logical corollary of the previously identified right to earn a livelihood.

In *Byrne v Ireland*, which has ramifications for my case, the following was stated by the Judge:

'It is as much a duty of the state to render justice against itself in favour of citizens as it is to administer the same between private individuals. The adjudication of such claims by their nature belong to the judicial power of government ... the whole tenor of our Constitution is to the effect that there is no power, institution, or person in the land free of the law save where such immunity is expressed, or provided for, in the Constitution itself.'

Both Mr. Justice Walsh, and Mr Justice Costello, two of Ireland's most prominent judges strongly supported Natural Law and publicly stated that some parts of the Constitution (fundamental rights) were derived from Natural law and that Natural law was anterior to positive law and superior to positive law. And that this was important in dealing with unjust laws.

Unjust laws and unjust legal practises and decisions have been struck down or over-ridden or rejected by the superior courts in judgments in the past for breaching the Natural Law and the Irish Constitution and it's fundamental rights which derive from the Natural Law. The legal Latin term 'Lex iniusta non est lex' (An unjust law is no law at all) has been used in the past in the context of Natural Law and its presence within Constitutions and Human Rights laws, to reject, over-ride or overturn unjust laws and this continues to be used in courts today. It is an important safeguard against a return to Fascism, Nazism, Communism, Theocracy, Apartheid, Slavery or Bonded labour, Imperialism and Colonialism also known as Globalism today, Military Dictatorship and the unjust laws which these regimes make 'legal' and enforceable in their courts. These oppressive and dictatorial ideologies misused, subverted and undermined democracy to gain power within countries in the past ; democracy remains vulnerable to this type of attack in the modern world. And there are risks to Democracies such as Ireland today.

Natural Law is superior to Constitutional law and to positive law created by politicians in the Dail and court precedents set by judges.

These inalienable, antecedent, imprescriptible and unenumerated rights include the right to freedom of travel, the right to bodily integrity and not be injured, made ill or killed by experiments including experimental vaccines , the right to full and valid informed consent for experimental vaccines and drugs, the right to redress in the courts including injunctions to stop unsafe experimentation, including vaccines, on the people of Ireland, the right to life and not to be killed by experiments, the right to liberty without being forced or manipulated into taking experimental vaccines, the right to freedom of religion, to freedom of speech, freedom of the press and freedom of expression, to freedom to earn an honest living, freedom of assembly and freedom of conscience, and lastly **the right to due process under law, to equality of arms under law, to a fair hearing and a fair trial.**

This breach of the Natural Law is grounds alone for granting us the Injunction and any other legal remedies the High Court deems fit in this situation.

## **10. The Breaches of Irish Constitutional Rights, EU and UN Human Rights and International laws and treaties in this case**

Informed consent is intrinsically related to bodily integrity as found in the Irish Constitution, and both are fundamental rights which are protected under the Irish Constitution. Irish politicians, the chief medical officer, NPHET, Pfizer and Big Pharma do not have special privileges to undermine or block these fundamental rights. Informed consent and bodily integrity are joined together and deprivation of one completely undermines the other. Bodily integrity is one of the main issues here in relation to covid19 vaccines when one considers the high numbers of deaths, illnesses and disabilities caused by this vaccine and the big rise in excess mortality in Ireland, Britain, Europe and North America, including sadly the big rise in excess mortality for children in Europe and elsewhere in 2021 and 2022.

In the famous case of Ryan vs the Attorney General in 1965 presented before the High Court and Supreme Court in Ireland, the right to bodily integrity was affirmed and upheld by the High Court and the Supreme Court. This forms part of our unenumerated rights under the Irish Constitution. The Irish Supreme Court has ruled that, *"The requirement of consent to medical treatment is an aspect of a person's right to bodily integrity under Article 40, section 3 of the Constitution"*. This High Court case today is about these same unenumerated rights, specifically informed consent and bodily integrity which are intrinsically linked together, and the related Constitutional right to life, and the right not to be poisoned or made ill by an experimental vaccine. There are clear breaches of these unenumerated rights in the government's covid19 vaccine programme and this is serious and warrants a halt to the covid19 vaccination programme.

The Right to Bodily Integrity is an unenumerated right, protected under Article 40.3.1 of the Irish Constitution which provides that:- *"The State guarantees in its laws to respect, and, as far as practicable, by its laws to defend and vindicate the personal rights of the citizen."* This includes children. The approval and giving of covid19 vaccines to people without full disclosure of material risks and dangers to people and without their valid and informed consent where there are significant risks of serious illness, disability or premature death, and there are cases where deaths, illnesses and disabilities have occurred is a breach of their bodily integrity, and their Constitutional rights and a breach of a Supreme Court judgment in this matter. This also constitutes the crime and tort of trespass and battery. These are valid grounds to put an end to this covid vaccination programme.

The Constitutional rights of the family are relevant here in this court case, I cite Article 41: "1.1°: of the Irish Constitution -

‘The State recognises the Family as the natural primary and fundamental unit group of Society, and as a moral institution possessing inalienable and imprescriptible rights, antecedent and superior to all positive law.’

The parents have Constitutional rights which must be respected by the CONSTITUTIONAL HIGH COURT and all courts and Informed Consent for parents or guardians of children is one of the most important and fundamental of these rights. And this is especially the case where Informed Consent involves dangers of death or injury, illness or disability to the child in the family. These vaccines and the non disclosure of material risks and dangers are an attack on the Irish family, and this is a clear breach of Article 41 of the Constitution in this case.

Article 42A was added to the Constitution in 2015. It affirms children’s natural and imprescriptible rights and the State’s and Court’s duty to uphold and protect these rights including in this case the right to bodily integrity, to full disclosure about vaccine harms, and to full and valid informed consent by their parents and guardians. The right to bodily integrity for children is guaranteed under the Fundamental Rights, Natural law rights and inalienable rights of the Irish Constitution, specifically Articles 40 – 44 which have been upheld in several CONSTITUTIONAL HIGH COURT cases and Supreme Court cases in Ireland – See book of evidence number one. Under Article 40.3 of the Irish Constitution, Section 2° states that the State shall, in particular, by its laws protect as best it may from unjust attack and, in the case of injustice done, vindicate the life, person, good name, and property rights of every citizen. These Fundamental rights, stated in Articles 40 – 44 of the Constitution are being breached through the attack on the bodily integrity and health and well being of children due to lack of disclosure of material risks and dangers about the vaccine and lack of fully informed decision making which prevents full and valid Informed Consent by the parents.

## **11. Breaches of European and International Laws in this case**

This denial and blocking of informed consent in Ireland and attack on bodily integrity is a breach of important international laws and treaties which are binding in Ireland and in Irish courts and include breaches of the following:

- All articles of the Nuremberg Code (1947) apply here in relation to children and getting the full and valid Informed Consent of the parents or guardians
- Articles 2, 3, 4, 7, 20 and 24 of the European Charter of Fundamental Rights. The Right to life and right to integrity of the person and to informed consent. And the prohibition of inhuman treatment. And the rights of the family. And the right to equality before the law. And the rights of the child.

- Articles 2, 3, 8 and 17 of the European Convention on Human Rights
- The Oviedo Convention also known as 'The Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine'. This Convention is **the only international legally binding instrument** on the protection of human rights in the biomedical field. It draws on the principles established by the European Convention on Human Rights, in the field of biology and medicine.
- The UN Declaration of Human rights which protect the right to life and to bodily integrity
- The International Covenant on Civil and Political Rights
- The Declaration of Helsinki (1964-2004)

These breaches are serious offences in national and international law. These breaches alone are grounds for halting this covid19 vaccination programme for children and also for adults. The International Covenant on Civil and Political Rights which is international law and is binding in Ireland upholds this right to bodily integrity and informed consent and states the following:

"In particular, no one shall be subjected without his free consent to medical or scientific experimentation."

## 12. Summary of Breaches of Laws and Constitutions

The issue of lack of informed consent and the threat to bodily integrity encompassing death, serious injuries, illnesses and disabilities for children and also for adults involve breaches of many important laws and the Constitution and Supreme Court judgments. This necessitates an Injunction or possibly Injunctions. The legal grounds for an Injunction are :

**(a)** The right to bodily integrity which is protected under Articles 40-44 of the Irish Constitution and these are being breached. The precedent set by the Irish Supreme Court in Ryan vs Attorney General and the existence of unenumerated rights under the Irish Constitution which have been breached. We ask the Court to support our Injunction to protect Irish children and their rights.

**(b)** The natural and imprescriptable rights of children and the family is protected under Articles 41 and 42 of the Irish Constitution and these are being breached. We ask the Court to support our Injunction to protect Irish children and their rights.

**(c)** The UN Declaration of Human Rights and the UN Convention on the rights of the child confer special protections for children and these are being breached. We ask the Court to support our Injunction to protect Irish children and their rights.

**(d)** Articles 2, 3, 4, 7, 20 and 24 of the European Charter of Fundamental Rights confers protection for children and parents / family and these are being breached. We ask the Court to support our Injunction to protect Irish children and their rights.

(e) Articles 2, 3, 8 and 17 of the European Convention on Human Rights confers protection for children and parents / family, and these are being breached. We ask the Court to support our Injunction to protect Irish children and their rights.

(f) The evidence of harms caused by the covid19 vaccines worldwide shows that these vaccines and those people who manufacture, approve, promote, distribute and inject them are in breach of Articles 4 and 6 of EU Directive 85/374 and the ECJ ruling in N.W. v. Sanofi Pasteur MSD SNC, 2017, and that they may be subject to being sued in the civil courts and criminal courts of Europe.

(g) The Oviedo Convention also known as 'The Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine'. This Convention is the only international legally binding instrument on the protection of human rights in the biomedical field. It draws on the principles established by the European Convention on Human Rights, in the field of biology and medicine. This Oviedo Convention confers protection for all persons including children and parents / family, and several articles including 1, 2, 5, 6, 10, 13, 16, 17, 23, and 28 of this Oviedo Convention are being breached. We ask the Court to support our Injunction to protect Irish children and their rights.

(h) Declaration of Helsinki (1964-2004) confers protection for children and parents / family, and these are being breached. We ask the Court to support our Injunction to protect Irish children and their rights.

(i) The International Covenant on Civil and Political Rights) confers protection for children and parents / family, and these are being breached. We ask the Court to support our Injunction to protect Irish children and their rights.

The Irish Courts are non political and independent of government and politicians and non censored, and there is supposed to be a separation of powers in Ireland, under the Irish Constitution. The courts have a right and a legal duty to take a different line to the government and to actively disagree with them on points of law, and of national importance and on Public interest issues and Common Good issues. This court case is a true test of the separation of powers in Ireland and of what constitutes the Public Interest and the Common Good. The High Court here has a legal and Constitutional duty to examine the facts and evidence and the national and international laws which apply here and make a truly independent decision.

**13. As these were experimental vaccines until 2023 and carried serious known risks of death, serious illnesses and disabilities there are Legal Questions to be addressed by the Attorney General in court which have a bearing on Informed Consent, Non Disclosure, and the material risks and dangers involved for the Irish public**

- (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, for gaining alleged informed consent by deception, lies, manipulation and misrepresentation or fraud – all of which led to mass deaths, injuries, illnesses and disabilities.

Under the Irish Constitution all 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 harm, death, serious injuries or disabilities to the general public. There is no legal immunity for state officials and politicians. I cite the 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.

#### **14. Undermining and destroying the Capacity of people to make a Fully Informed Decision leading to Full and Valid Informed Consent**

There was and is much evidence of intense, prolonged and continuous propaganda in the press and media directed at the general public in relation to covid19, lockdowns, masks, and covid19 vaccines and this has had a profound and adverse effect on the capacity of individuals to make important decisions – that being the ability of a person to make a free, independent and fully informed decision which would lead to their full and valid informed consent to a covid19 vaccine. Only one narrative was allowed in the

press and media, and on social media on the Internet that of the government and health authorities. Continuous propaganda to the point of brainwashing the general public severely impaired their capacity to make fully informed decisions and this impaired and undermined their ability to provide full and valid informed consent. The capacity of individuals was severely undermined and impaired by this. For example the material risks and dangers of the covid19 vaccine were censored in the press and media, in government announcements, and on social media on the Internet. Capacity should mean one has a balanced view of a vaccine or medical product, where he or she can weigh up the costs and benefits of a vaccine or medical product, and this includes full knowledge about vaccine risks and dangers and also effectiveness and loss of effectiveness within a few months.

Dr. Mattias Desmet is a lecturer of Psychoanalytic Psychotherapy and Psychology at the Department of Psychoanalysis and Clinical Consulting, in Ghent University in Belgium and he has written scientific papers and a book 'The Psychology of Totalitarianism' about the reactions of government and peoples to covid19. He called this "Mass Formation" where whole populations have been subjected to continuous propaganda and been brainwashed with one narrative about covid19 and covid19 vaccines. He stated that it is a form of totalitarianism. And this propaganda and brainwashing has affected the capacity of most people to make fully informed decisions. It has impaired and undermined the capacity of individuals.

This is corroborated by the fact that information released from SAGE in Britain shows that the British government had a special unit of psychologists and psychiatrists to advise SAGE and the government how to use propaganda, brainwashing and mass formation to control the general public. Other governments including the Irish also did this.

Capacity is very important from a legal point of view and is a vital part of Informed Consent. This impairment of capacity, this undermining of capacity, this loss of capacity here has prevented fully informed decision making which prevented full and valid informed consent for these vaccines. The covid19 vaccine injuries, illnesses, disabilities, and deaths were well known to medical science and government and health authorities globally by July of 2021. To facilitate capacity in individuals and the general public the material risks and dangers should have been communicated from July 2021 onwards but were not. Furthermore the government acted to censor this information in the press and media and the medical council followed the lead of the government and Big Pharma in this.

Valid informed consent legally requires the following ingredients

- (i) given by a person with capacity;
- (ii) voluntarily given, without any element of duress and;
- (iii) with the requisite information of risks, side-effects and alternatives such that the patient is able to make an informed decision as to whether or not to proceed with treatment.



These 3 points have been illegally blocked by government and health authorities and the censored press and media. Point 2 was undermined by vaccine mandates in the health service and in many businesses which coerced their employees to get covid19 vaccines or they would lose their jobs. And by vaccine passports which coerced or manipulated people to get vaccines in order to travel abroad or visit restaurants, pubs, clubs, concerts, cinemas and theatres. Point 3 about not disclosing information about material risks has been explained at length here. For Point 1, a person cannot have capacity to make a free, independent and fully informed decision if he or she is bombarded constantly with propaganda in the press and media stating the vaccine is safe and effective while they are deliberately deprived of the information about the material risks and dangers involved which show that the vaccine is unsafe and ineffective. And to reinforce this he or she is subjected to vaccine mandates in workplaces which force one to get the vaccine or lose his or her job. And by vaccine passports which coerced or manipulated people to get vaccines in order to travel abroad or visit restaurants, pubs, clubs, concerts, cinemas and theatres.

And the censored press and media refused to divulge such information to the general public, and engaged in propaganda and kept repeating the mantra that the covid vaccines were safe and effective and stop spread. Propaganda was used in the censored press and media and by government and health authorities to manipulate and coerce people into getting the covid19 vaccines. This created incapacity in people, the inability to access accurate and correct information about material risks and dangers involved, and make fully informed decisions, and provide full and valid informed consent prior to them getting the covid19 vaccines.

Capacity is very important, in Fitzpatrick vs K, 2008, in the High Court in Ireland, Justice Laffoy stated that capacity was adjudged to be a critical factor in informed consent. This vast undermining of capacity among the general public, including among covid vaccine recipients, created a serious incapacity, that is the incapacity to weigh up all the material risks of the covid19 vaccines and to understand the consequences and this is grounds alone for halting the vaccine programme.

## **Summation**

The facts and evidence, the legal arguments, court precedents and breaches of the Constitution, the Natural law, and national and international laws regarding deprivation of full and valid informed consent and the obtaining of informed consent by Non Disclosure, False Pretences, Deception and Fraud are well detailed and explained above and support our request for an Injunction and any other remedies the High Court deems fit in the circumstances.