

Grounds for Protective Costs Order

1. I say that on the Substantive issue of a Protective Costs Order for this court case, this High Court case revolves around important Irish Constitutional issues and breaches of the Irish Constitution and the need for full accountability by elected politicians and senior civil servants, all of which affect the Public Interest and the Common Good. I cite the Irish Constitution of 1937:

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

Under the Irish Constitution, the power belongs to the people of Ireland, and it is important to realise that the elected politicians and senior civil servants serve the people of Ireland and are accountable to the people of Ireland. They do not serve and are not accountable to big vaccine companies or Big Pharma and their lobbyists, or to foreign Globalist institutions or EU bureaucrats or the elite. 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. 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. This is a matter of huge Public Interest.

This is an issue of accountability for all branches of government , and for senior civil servants and the free press and media, and is an issue of great Public Interest and it involves the Common Good. Thus it qualifies for a protective costs order and it qualifies for full hearings in civil courts and criminal courts and the superior courts. This fact is being reinforced by the high number of covid19 vaccine injuries, illnesses, disabilities and deaths and the big rise in excess mortality in Ireland since mass covid19 vaccinations began in mid 2021 and the same has been happening in other highly vaccinated countries. Large numbers of vaccinated people getting injured, ill, disabled, and dying and pushing up excess mortality figures in Ireland is a matter of supreme national importance. And as evidence of this continues to come in, we will submit this evidence to the High Court to support the request for a protective costs order and the request for an injunction.

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

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

You can read the letter here at this link :

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

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

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

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

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

Hypertension – 2,181% increase

Diseases of the nervous system – 1,048% increase

Malignant neoplasms of esophagus – 894% increase

Multiple sclerosis – 680% increase

Malignant neoplasms of digestive organs – 624% increase

Guillain-Barre syndrome – 551% increase

Breast cancer – 487% increase

Demyelinating – 487% increase

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

Female infertility – 472% increase

Pulmonary embolism – 468% increase

Migraines – 452% increase

Ovarian dysfunction – 437% increase

Testicular cancer – 369% increase

Tachycardia – 302% increase

These are stunning numbers.

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

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

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

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

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

You can read the US Senators letter here at

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

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

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

The Irish government and health authorities did not reveal these facts to the Irish people and those people who got vaccinated. The Irish government and health authorities did not communicate the data from VAERS, V-Safe, DMED, MHRA and Eudravigilance and others showing a high number of injuries, serious illnesses, disabilities and deaths caused by these vaccines to the Irish public and to those people who got the covid19 vaccines. They parroted the words “safe and effective” for these vaccines continuously in the press and media and in medical leaflets but refused to tell the Irish public about the risks and dangers. This in itself was fraud and they used fraud and deception to get the informed consent of people for these vaccines in Ireland. This has had devastating consequences for many people around Ireland in terms of vaccine injuries, serious illnesses, disabilities and premature deaths.

This is clearly a Public Interest case and is deserving of a Protective Costs Order.

3. 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.

This is clearly a Public Interest case and is deserving of a Protective Costs Order.

4. I further say that a Protective Costs Order is justified on the basis that this court case is directly addressing an issue of supreme national importance in Ireland and it impacts the Public Interest, and it is directly and indirectly affecting the lives of most people alive in Ireland today, the general public, including judges in the High Court and Supreme Court and all of the courts in Ireland, and both the defendants and the plaintiffs and their families and relations. For example, if one was to do a random survey of the personnel working in Irish courts including the judiciary and administrators one would find that family members, relations, friends and colleagues got struck down with injury, illness, disability or sudden death after receiving a covid19 vaccination or booster. This same problem is replicated across Ireland affecting most communities around Ireland as shown in the 42% rise in excess mortality in the period December 2022 to the end of January 2023 in Ireland and the large rise in excess mortality in 2022 and from mid 2021 onwards. And the evidence shows that this same trend has happened and is happening in other highly covid vaccinated countries. Based on these facts, it is obvious that this court case involves the Public Interest and the Common Good and Irish national security and thus qualifies for a Protective Costs Order.

On this point, does an issue of supreme importance to the Irish public, which impacts the lives of all judges of the Irish courts, and all court administrators and officers of the Irish courts, and plaintiffs and defendants

in the Irish courts and the families and relations of all these people and members of the general public matter ? does it matter ? if so, then it is clearly obvious that this court case involves the Public Interest and the Common Good and Irish national security and thus qualifies for a Protective Costs Order.

5. 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.
6. We will present top scientists and medical doctors as expert witnesses for this High Court case who will confirm and verify the evidence we present to the court, and the harms caused by the covid19 vaccines and the fact that full and valid informed consent was not given for these vaccines.
7. I further say that a Protective Costs Order is justified on the basis of 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.

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 and their lobbyists, or to foreign Globalist institutions or EU bureaucrats or the elite. They do not serve and are not accountable to big vaccine companies or Big Pharma and their lobbyists, or to foreign Globalist institutions or EU bureaucrats or the elite. This is a very important point. This accountability 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. 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.

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 its 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 its 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

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 without being blocked by oppressive costs.** This is the Natural Law and is another ground for our Protective Costs Order and the Injunction we seek in the court.

8. I further say that full Disclosure and full Accountability by Irish government and health authorities are their Constitutional and legal duties and they should have performed them, but did not. These duties of full Disclosure and full Accountability are essential for the functioning of Democracy in Ireland, they are related to full and valid informed consent for vaccines and medical drugs for the Irish people and the right to bodily integrity and the right to life for the Irish people which are protected Constitutional rights, fundamental

rights and unenumerated rights. The breaches of these Constitutional and legal duties and the breaches of these Constitutional rights, and the myriad consequences flowing from them is a matter of the utmost importance to the High Court and to the criminal courts in Ireland. There is a lot at stake in this High Court case, including Constitutional rights and Constitutional duties, national sovereignty rights, Human Rights, Civil Rights, Natural Law Rights, legal rights and statutory rights of the people of Ireland. No politician or political “advisor” or senior civil servant has the right to deny these fundamental rights to the people of a nation and to breach these rights. This court case is most definitely a Public interest case and is serving of a Protective Costs Order.

9. I further say that that the aforementioned ‘inalienable and imprescriptible rights, antecedent and superior to all positive law’ and the Fundamental rights under Articles 40 to 44 in the Irish Constitution and breaches of these important rights and other Constitutional rights are the basis of this High Court case, and this qualifies this case as a Public Interest case and qualifies it for a Protective Costs order in the High Court. Other grounds for granting Protective Costs in this case involve breaches of international Human Rights laws, Irish laws and EU laws and international laws and treaties which adversely affect or damage the Common Good and the Public Interest in Ireland and are cited in the previous two affidavits filed in the High Court in November and December 2022.

Furthermore, The Coroner for Mayo, Mr. Patrick O’Connor has described the sudden and unexpected death of a healthy 14 year old boy in Mayo, shortly after getting a covid19 vaccination as an issue of ‘significant public concern’ at the opening of the inquest in November 2022. The issues in this court case revolve around sudden and unexpected deaths of covid19 vaccinated people and the sudden onset of serious illnesses and disabilities after covid19 vaccinations and the role of full and valid informed consent in this, and this is of significant public concern and involves the Public Interest. This is a Public Interest case and qualifies for a Protective Costs Order.

The HSE and Minister for Health and Department of Health do not wish to address the scientific, medical, autopsy, and statistical facts and evidence in court and the denial or deprivation of full and valid Informed Consent for those who are vaccinated or considering vaccination but are relying on using the weapon of Costs to deny us Protective Costs in court and deprive us of justice under law and a fair hearing in the High Court. The facts and evidence in this affidavit and our other affidavits and books of evidence clearly show that this is a Public Interest case and involves the Common Good and Public Interest and it clearly and unequivocally qualifies for a Protective Costs order. This attempt to deny us Protective Costs, and the use of costs as a weapon to deny justice and a fair hearing in court, is a breach of the Irish Constitution of 1937 and Article 6 of the European Convention on Human Rights and are breaches of other national and international laws as outlined in my affidavit filed with the court in November 2022. The state parties have

the use of millions or billions of euros of taxpayer's money to fight such cases in court and deprive the people of Ireland and the nation of Ireland of justice under law and a fair hearing under law.

The High Court can remedy this by granting us a Protective Costs order so that this case can proceed in court.

10. This High Court case revolves around the issue of informed consent or more precisely the deprivation of informed consent for the Irish people and Irish nation, and I have cited over 25 breaches of informed consent in our affidavits and legal argument, and cited over 20 court precedents from the superior courts in Ireland, Britain, the USA and other countries in our affidavits filed in the court which support our claim and our request for a protective costs order and an injunction.

11. To further elaborate the fact that this court case is a Public Interest case and is deserving of a Protective Costs Order, I cite the fact that Emmanuel Lavery is joining us as a Plaintiff. Emmanuel is the father of three young children aged between 4 and 11 years old. He is opposed to this experimental covid-19 vaccination for his children while his wife wants to vaccinate them. Emmanuel has read some of the scientific, medical and statistical evidence about the covid19 vaccines and he believes they may seriously harm, disable or kill them. He opposes the vaccine on this basis as he has a parental duty of care to protect his children. His wife believes the propaganda and wrong or misleading information put out by some politicians, civil servants, the HSE and some of the mainstream press and media, and this is encouraging her to vaccinate them.

This has caused and is causing great conflict and division inside his family, and the lives of children are at stake. This is being replicated in thousands of families across Ireland with families being torn apart over the covid19 vaccination of their children leading to family rows, domestic abuse, family splits, threats, intimidation, and criminal charges in some cases. This is being accompanied by a big rise in excess mortality, sudden child death syndrome and sudden adult death syndrome after covid19 vaccinations began in Spring 2021, which is devastating families all over Ireland. Irish families are being destroyed by the impact of this covid19 vaccine, and as Article 41 of the Irish Constitution protects the Irish family, I cite the following lines from it

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

it will be up to the High Court and/or Supreme Court to adjudicate on this important issue and the Constitutional rights involved. This court case is one of the most significant public interest cases in Ireland in over fifty years.

12. 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

The average Infection Fatality Rate for covid19 was:

- 0.0003% for 0-19 years of age
- 0.003% for 20-29 years of age
- 0.011% for 30-39 years of age
- 0.035% for 40-49 years of age
- 0.129% for 50-59 years of age
- 0.501% for 60-69 years of age

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 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.

- 13.** The covid19 vaccine risks versus benefits were clearly outlined in an affidavit filed in the High Court in January 2023. This uses scientific evidence, medical evidence and official statistical evidence from Ireland, Britain and around the world.

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.

- 14.** The Aarhus Convention bans prohibitive costs and has been used in Irish courts and European courts to apply for and grant Protective Cost Orders in respect of threats to the environment. The covid19 vaccine presents a significant threat to the environment in terms of vaccine deaths, illnesses and disabilities caused to humans in the lived environment and the ingredients in the vaccines which are harmful to humans, animals and the environment and which are now well known and well established and documented. The life, health and well being of human beings, including children are an integral part of the environment. This legal case addresses a serious threat to the environment in terms of killing, injuring or disabling children who are the future of Ireland, and also adults living in the environment and creating a more dangerous environment to live in. This comes within the remit of the Aarhus Convention and also the Precautionary Principle, and is another valid ground for granting a Protective Costs Order.

15. The Environment (Miscellaneous Provisions) Act 2011 provides for Protective Costs Orders along similar lines to that of the Aarhus Convention
16. **The Irish Supreme Court** in *Heather Hill Management Company CLG v an Bord Pleanála* (2022) has ruled that litigants challenging planning permissions on environmental grounds are entitled to a special protective costs order (PCO) for all of their grounds of challenge. Environmental grounds encompass the lived environment in which human beings live including vaccines injected into them and where this poses environmental risk in terms of a significant and higher risk of death, illness or disability to those living in the environment in addition to damage to the environment from the ingredients in these vaccines.
17. EU legislation provides that member states are to provide the public with the right to participate in environmental decision making and that procedures governing environmental matters should not be unduly prohibitive in terms of cost (Article 10a of EC Directive 85/337, incorporating international obligations under the UNECE Aarhus Convention). The ECJ found that the failure of Ireland to put in place costs rules in relation to environmental review procedures was in violation of EU legislation and it was not enough that the Irish courts have discretion to not apply the usual costs rule (*Commission -v-Ireland C-427/07*)
18. The first Protective Costs order was granted in Ireland by the Constitutional High Court in the case of *Max Schrems v Data Protection Commissioner* [2014] IEHC 310 and it cited the public interest and common good and the fact that he had an insignificant private interest in the case and the very high legal costs would cause financial ruin for him and act to deprive him of a fair trial and justice and under law.
19. A report by the European Commission titled '2022 Rule of Law Report Country Chapter on the rule of law situation in Ireland' applies in this court case. It states that the cost of justice under law should not be so prohibitive and oppressive that it deprives people of seeking or getting justice in the domestic courts. And this is especially the case in respect of bringing a court case to help protect the lives and health of many thousands of Irish children. I quote from this report below:
- 'Continue actions aimed at reducing litigation costs to ensure effective access to justice, taking into account European standards on disproportionate costs of litigation and their impact on access to courts.'
- 'Following a review of the Administration of Civil Justice in 2020, concerns have remained in relation to the litigation costs in Ireland. The Minister for Justice stated in October 2021 that legal costs in Ireland are prohibitive and act as a barrier to people exercising their rights before the courts'
- 'European Commission (2019), The Environmental Implementation Review 2019, Country Report Ireland. The review recommended Ireland to ensure that individuals and environmental NGOs can bring environmental challenges without facing prohibitive costs'

‘This is important, as European standards provide that disproportionate high costs can limit the access to a court of citizens’

- 20.** The covid19 vaccines are in experimental stage until mid 2023 according to the vaccine companies themselves and in published ongoing scientific studies. There are no long term scientific studies on the illnesses, disabilities and premature deaths caused to covid19 vaccine recipients, including adults and children. In fact there have no safety studies for children completed yet.

In R (on the application of the British Union for the Abolition of Vivisection) –v- Secretary of State for the Home Department [2006] EWHC 250 (Admin) a protective costs order was granted by the Constitutional High Court for an NGO wishing to halt experiments on animals.

Surely a legal case involving human beings, especially small children who may become involved in a covid19 vaccine experiment where are significant risks are entitled to a Protective Costs Order based on the court precedent set in England.

On the issue of experimentation on human beings including children, we will be citing the Nuremberg Code, the Nuremberg trials including the doctors trials of 1946 and European and International laws governing this in our legal arguments. It is in the public interest to have these matters debated, deliberated on and adjudicated on in the High Court.

- 21.** In the criminal case of DPP vs Paul Murphy and others also known as the ‘Jobstown trial’, protective costs orders were given to the defendants as the legal costs exceeded their incomes and were prohibitive to the extent that they could have undermined their legal right to a fair trial and justice under the law.
- 22.** In Roche vs Roche the Irish Supreme Court ordered the successful party to pay the costs of the unsuccessful party as the case raised a unique and exception issue of public importance which “surpassed, to an exceptional degree, the private interests of the two parties..”

Our case is similar in this respect.

Another ruling of the Supreme Court in Curtin v Clerk of Dail Eireann & Ors, 2006, stated that where a matter raises legal issues of special and general public importance, this may warrant the granting of a Protective Costs Order. The Supreme Court involved ‘exceptionality’ as the applicable standard for diverging from the usual costs rule of the courts. We are certainly dealing with very exceptional circumstances in this court case.

- 23.** In England the Protective Costs Order rules are more well developed in terms of case law and precedents and general applicable principles. The lead English authority on this is R v Secretary of State for Trade and Industry EWCA Civ 1342 provides that a Protective Costs Order may be granted where:

- the issues are of general public importance
- the public interest requires that the issues be resolved
- the applicant has no private interest in the case
- it is fair and just to make the order
- the applicant will probably discontinue the proceedings if no Protective Costs Order is made

We ask that these criteria from the English courts be considered and applied in this Constitutional High Court in Ireland.

24. Equality of Arms under law. And the Constitutional right under Article 40 stating that all persons are equal before the law. The financial might of the state is pitted against ordinary citizens who are taking a legal case to protect the lives and health of thousands of children in Ireland. The state with its financial might and unlimited resources can bully, intimidate, frighten, and threaten ordinary people in public interest court cases via the stick of high and exorbitant costs and use that to stop important and necessary cases proceeding in court. This creates inequality of arms in law and breaches article 40 of the Constitution.

25. Provisions under Articles 6 and 13 of the European Convention on Human Rights give one a right to due process, fair procedure, equality of arms, and litigation rights in courts especially in court cases of significant national importance and the Public Interest, which include significant risk of death, serious illness or disability to small children and people in general and accompanying breaches of human rights, Constitutional rights of informed consent and bodily integrity in the courts and NOT have this denied by oppressive costs or prohibitive costs.

As this case involves risk to the lives of many thousands of Irish children including life long injuries or illnesses or premature deaths, it affects the future of the Irish nation and people and the future of Ireland and it is obviously a public interest case of some importance and needs to proceed. The HSE and Minister for Health and Department of Health do not wish to address the scientific, medical, autopsy, and statistical facts and evidence in court and this denial or deprivation of full and valid Informed Consent for those who are vaccinated or considering vaccination but they are relying on using the weapon of Costs to deny us Protective Costs in court and deprive us of justice under law and a fair hearing in the High Court. The facts and evidence in this affidavit and our other affidavits and books of evidence clearly show that this is a Public Interest case and involves the Common Good and Public Interest and it clearly and unequivocally qualifies for a Protective Costs order. This attempt to deny us Protective Costs, and the use of costs as a weapon to deny justice and a fair hearing in court, is a breach of the Irish Constitution of 1937 and Article 6 of the European Convention on Human Rights and are breaches of other national and international laws as outlined in my affidavit filed with the court in November 2022. The state parties have the use of millions or billions of euros of taxpayer's money to fight such cases in court and deprive the people of Ireland and the

nation of Ireland of justice under law and a fair hearing under law. As it is the ordinary taxpayers of Ireland whose lives will be damaged, disabled or terminated via premature deaths, the taxpayers deserve to have a fair hearing in the High Court.

The High Court can remedy this by granting us a Protective Costs order so that this case can proceed in court. We ask that a Protective Costs Order be granted by the Constitutional High Court on these grounds before the case proceeds and before any injunction request is heard by the court.

26. This High Court case involves several counts of fraud in relation to the covid19 vaccines. I have itemised them in the affidavits filed in the High Court and given to the defendants. I have also included them in a fraud document which I will give to the court and the defendants. We are pleading fraud in this High Court case. As this fraud has been perpetrated on the Irish people and nation, this makes it a Public Interest case, and it is necessary to bring these matters to the High Court and Supreme Court for adjudication. This is another ground for a Protective Costs Order. We will be citing the judgment and precedent of Judge Lord Denning and other judges and courts in relation to this fraud.

27. We have expert witnesses including top scientists, medical doctors, pathologists, professors, embalmers, funeral directors, and medical professionals who will testify via video link with the High Court. They will corroborate our claims before the court. We also have many people who are injured and made ill or disabled by the covid19 vaccines who will testify in this High Court case. These are ordinary members of the Irish public and this drives home the point that this involves the general public and is thus a public interest case. And this qualifies it for a Protective Costs Order.

28. More court Precedents which support our request for a Protective Costs Order on the grounds that Informed Consent is a fundamental right, an unenumerated right and a Natural Law right which is protected under the Irish Constitution and international Human Rights

We cite many court precedents from courts in Ireland, Britain, Europe, and North America to support our claim. 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 the legal issue 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.

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 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 25th October 1946; the trial lasted from 9th December that year until 20th 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.

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.

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.

More Court Precedents and Breaches of Constitutional rights and Human Rights laws

I cite the 6 Dunne Principles which emerged from *Dunne v. National Maternity Hospital* which was argued before the Irish Supreme Court. The 6 Dunne Principles define medical negligence and are highly relevant in this court case. The provision of experimental covid19 vaccines which have been proven to be unsafe and ineffective and for which over 1,000 published studies can attest to, and for which hundreds of thousands of deaths and millions of injuries, illnesses and disabilities worldwide can attest to, provides an excellent example of medical negligence. And information about the material risks were not communicated to covid vaccine recipients. And information about ineffectiveness against new strains of covid19 were not provided. This medical negligence on the part of the HSE, the chief medical officer, NPHET, NIAC, the medical council, Irish doctors and vaccinators is grounds alone for ending this covid19 vaccination programme.

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.

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.

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.

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.

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."

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.