

BETWEEN:

DAVID EGAN AND SHARON BROWNE AND EMMANUEL LAVERY

Plaintiffs

-And-

MINISTER FOR HEALTH, AN TAOISEACH, AND HSE

Defendants

Exhibit 151 Cost – Benefit Analysis for Covid19 vaccines

I say that the **Cost-Benefit Analysis** for covid19 vaccines and boosters for children, under 18, shows that the vaccines and boosters have far more costs than benefits for children. And that this should be a major consideration point for the High Court in its decision on an Injunction.

Risk from Covid19 vaccines

- Risk of serious adverse event including death and life long illness or disability from the covid19 vaccine / booster: 1 in 800 or 1,250 per million according to a published peer reviewed scientific study - Fraiman et al. 2022

<https://pubmed.ncbi.nlm.nih.gov/36055877/>

This is higher than previous vaccines in the past. And the numbers for serious illnesses, disabilities and deaths are much higher. This is verified from reports from government databases such as VAERS and many others worldwide and scientific studies about this have been provided in previous affidavits and in our books of evidence. More scientific studies about this are included later in this affidavit. And also verified from Pfizer's own internal documents released under court order in the USA in 2022.

- Risk of myocarditis or pericarditis or late gadolinium enhancement or serious heart inflammation and illnesses : ranging from 23,000 per million to 1 per 1,000 (1,000 per million) according to published scientific studies. These figures could be higher according to more recent scientific studies.

In one recent scientific study, 100% of covid19 vaccinated children had late gadolinium enhancement.

Source: Admission and follow-up cardiac magnetic resonance imaging findings in BNT162b2 Vaccine-Related myocarditis in adolescents

Ozen et al. 2022

In another scientific study, 763 students (17.1%) had at least one cardiac symptom after the second vaccine dose, mostly chest pain and palpitations

Source: <https://link.springer.com/article/10.1007/s00431-022-04786-0>

Scientific studies about this have been provided in previous affidavits and in our books of evidence. More scientific studies about this are included later in this affidavit. In Ireland, the health authorities did not bother to check for this in covid19 vaccinated children and adults. This is evidence of serious neglect and of failure in their duty of care to the public. They should have included that fact in the documentation they sent to our legal team for this High Court case.

- CDC Study found 49% of Children Ages 5 to 11 Experienced Systemic Reactions After Getting the New COVID Booster. Of 3,259 children in the age group who received an updated Pfizer or Moderna vaccine and were registered in the v-safe system, nearly half experienced a systemic reaction, CDC researchers found. Seven hundred and two children experienced a health impact, such as being unable to attend school or being unable to perform “normal daily activities.”

Sources: <https://www.cdc.gov/mmwr/volumes/72/wr/mm7202a5.htm>

News report: <https://childrenshealthdefense.org/defender/cdc-children-systemic-reactions-covid-booster-et/>

- Higher risk of excess mortality as verified in official statistics provided in this affidavit and the previous affidavit filed in the High Court. This includes the massive rise in “sudden deaths” from mid 2021 to the present, 2023.
- I refer the court to Points 6a., 6b., and 7. of affidavit filed by us in the High Court in January 2023 which provides shocking official statistical evidence of a big rise in excess mortality for children after mass covid19 vaccinations of children starting in mid 2021.
- The evidence in this affidavit and previous affidavits and in our books of evidence and in published scientific studies and reports worldwide show that these vaccines and boosters are a losing all effectiveness after 5 months due to vaccine induced mutations, immune priming and antibody dependent enhancement. I cite part of Point 58 of this affidavit

‘ 58. I say that new scientific evidence corroborates our existing evidence and clearly shows that the covid19 vaccines lose all effectiveness after 5 months. Vaccines and boosters are losing effectiveness after 3 months and all effectiveness after 5 months due to vaccine induced mutations which create

newer variants, immune priming and antibody dependent enhancement. And that the Ineffectiveness of covid19 vaccines is also based on use of the outdated Wuhan strain of 2020 in vaccines and the use of outdated strains in boosters as the virus keeps mutating including mutating to escape the vaccines and boosters. All of these factors created Negative Effectiveness for covid19 vaccines and boosters, which means they increase one's risk of getting infected. This is Basic Science. All time peak infections occurred after mass vaccination. A total failure for the vaccine and boosters and glaringly obvious.'

Against

Risks from covid19 infection

- Risk of dying of covid19 infection for children: no child in Ireland died of covid19 during the pandemic according to the CSO. The risk for children and young adults who are under 25 is 1 in 1,650,000 or 0.00018%. Studies abroad found that the risk for those persons under 18 is 1 per 2 million or 0.5 per million. So there is a correlation between Ireland and international figures. The risk for children aged 5 to 11 is smaller again and would be 1 in 3 million. This is smaller than colds and flus. According to Dr. John Ioannidis the risk for under 19 year olds is 0.0003%

And this risk is much lower for those children who get early medical treatment with Ivermectin, Hydroxychloroquine, the Tyson and Fareed protocol or the Zelenko protocol. Deliberately depriving people of these medicines increased the risk of death for all age groups. These medical drugs also promote natural immunity to eliminate covid19 from the body. The risk is zero or is very near zero when this early treatment is used for children. Dr. Pierre Kory, one of our expert witnesses, can confirm this fact to the court.

- Aforementioned medical treatments accompanied by dietary, vitamin, and lifestyle changes to strengthen natural immunity is also a factor. For example, being obese and having diabetes gives one a higher risk of dying of viral infections, bacteria infections, cancers and cardiovascular death. This dietary, vitamin and lifestyle factor is in fact the highest risk factor of all for these type of deaths but has been and is being ignored by medical doctors, the medical council and the government and health authorities in Ireland and in other developed countries. This is a significant failure and places the general public at great risk. Ignoring a problem does not make it go away.

The risk reduction promoted above also applies to all other age groups. Many scientific studies have shown that natural immunity was and is superior to covid vaccine induced immunity, and these listed in previous affidavits and our books of evidence. T cell memory and immune system memory derived from naturally defeating an infection can last for over 90 years according to scientific studies.

- The Omicron variant and BA variants and XBB variants are weaker and less threatening than previous variants. The Omicron variant was highly infectious and infected almost everybody on earth and acted as an immunization agent against covid19, giving nearly everybody natural immunity against covid19. Scientific studies cited in our affidavits and books of evidence show that natural immunity is superior to vaccine induced immunity. This reduces the risk factor for children down further, by a factor of 3 or more. Variants continue to be similarly weak, as sars-cov2 has reached the endemic phase, which occurs with all epidemics. Unfortunately, the covid19 vaccines are generating new mutations and variants which can escape the vaccine. This is scientifically known as antibody dependent enhancement or immune priming and is well known to science and medicine. The scientific evidence shows that the vaccines and boosters can increase one's risk of being infected with these variants (vaccine induced mutations). It is scientifically possible that constant vaccinations and boosters could initiate a new mutation which is deadly and could kill high numbers of people.
- Natural immunity in children is far stronger than in adults. Natural Immunity has been proven to be superior to covid19 vaccine induced immunity according to hundreds of published scientific studies. I cite the Brownstone web site which has listed 150 scientific studies proving that natural immunity is superior to vaccine induced immunity as regards covid19. The title is '150 Plus Research Studies Affirm Naturally Acquired Immunity to Covid-19:'
<https://brownstone.org/articles/79-research-studies-affirm-naturally-acquired-immunity-to-covid-19-documented-linked-and-quoted/>

Scientific studies cited in this affidavit and previous affidavits and in our books of evidence confirm these facts. And a recent article in the Washington Post referenced many scientific studies showing that natural immunity is superior to covid19 vaccine induced immunity

Natural immunity to covid is powerful. Policymakers seem afraid to say so.

Washington Post. September 15 2021

<https://www.washingtonpost.com/outlook/2021/09/15/natural-immunity-vaccine-mandate/>

The evidence clearly shows that the costs exceed the benefits. But, these facts may interfere with the profit and financial motives of vaccine companies and politicians, doctors, scientists and senior civil servants who have serious conflicts of interest, and abuse their powers.

This was not explained to vaccine recipients and the general public, thus depriving them of full and valid informed consent for the vaccine. This was not explained to parents and guardians of children, yet it was and is vital to the obtaining of full and valid informed consent for the vaccine.

More Cost - Benefit Analysis

I say that the high risks of injury, serious illness, disability or premature death from the covid19 vaccine publicly admitted to by Pfizer in Points above and corroborated in this affidavit and previous affidavits filed by us and in our books and evidence, and the proven harmlessness of the Omicron variant and other covid19 variants and the fact that the virus has reached the Endemic Phase, and the availability of effective medical drugs to treat covid19 since May 2020 has completely changed the Cost Benefit Analysis for covid19 vaccines.

Cost Benefit Analysis for covid19 vaccines submitted to the High Court and defendants in the last affidavit of January 2023 showed that the costs far exceeded the benefits for children, under 18. I further say that an additional Cost Benefit Analysis for the covid19 vaccines shows that the costs far exceed the benefits for all age groups and that the financial costs far exceed the benefits. And that this is highly relevant, as the costs involved place Ireland at serious risk of more national bankruptcy. Bankrupting a country to provide the people with unsafe and ineffective vaccines so as to enrich big vaccine corporations and vested interests and those people and so called "experts" with conflicts of interest does not serve the Public Interest and the Common Good in Ireland. This is legal and Constitutional grounds alone to end all covid19 vaccinations.

Official data from the UK Health Security Agency (UKHSA) in Britain has made the following findings:

NNV = number need to vaccinate. This means the number of people you need to vaccinate to prevent one hospitalization or one serious hospitalization including ICU.

Source: UK Health Security Agency (UKHSA)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1131409/appendix-1-of-jcvi-statement-on-2023-covid-19-vaccination-programme-8-november-2022.pdf

NNV for prevention of hospitalization

5 – 11 Years, Autumn booster

For one hospitalization 34,200. For serious hospitalization / ICU 112,200

20 – 29 Years, Autumn booster

No risk group, For one hospitalization 169,200. For serious hospitalization / ICU 706,500

In a risk group, For one hospitalization 7,500. For serious hospitalization / ICU 59,500

40 – 49 Years, Autumn booster

No risk group, For one hospitalization 206,000. For serious hospitalization / ICU 932,500

In a risk group, For one hospitalization 6,000. For serious hospitalization / ICU 498,000

50 – 59 Years, Autumn booster

No risk group, For one hospitalization 43,600. For serious hospitalization / ICU 256,400

In a risk group, For one hospitalization 3,100. For serious hospitalization / ICU 18,600)

60 – 69 years, Autumn booster

For one hospitalization 3,600. For serious hospitalization / ICU 27,300

70 + Autumn booster

For one hospitalization 800. For serious hospitalization / ICU 7,500

These are massive numbers of people to be vaccinated to prevent one hospitalization or serious hospitalization / ICU.

Against

An important scientific study of the trials of covid19 vaccines for Pfizer and Moderna found serious adverse events of special interest, including hospitalizations, following mRNA COVID-19 vaccination.

Serious adverse events of special interest following mRNA COVID-19 vaccination in randomized trials in adults

Fraiman et al. 2022

<https://pubmed.ncbi.nlm.nih.gov/36055877/>

In the Moderna trial

the excess risk of serious AESIs was 15.1 per 10,000 participants

1 in 662 (over placebo baselines)

In the Pfizer trial

the excess risk of serious AESIs 10.1 per 10,000

1 in 990

Combined, mRNA vaccines, risk of serious adverse events of special interest including hospitalizations

12.5 per 10,000 vaccinated

1 in 800

This 1 in 800 getting seriously injured by the vaccine is well below the high figures cited above for number needed to vaccinate (NNV) to prevent covid19 hospitalization for different age groups. This means the costs of vaccines far outweigh any benefits. In other words, high numbers of people need to

be vaccinated to stop one covid19 hospitalization but in the process many more people get damaged by the vaccine. The ineffective treatment is worse than the disease.

This may be an underestimate as one study in Thailand found a risk of 29% for new heart and cardiovascular conditions and abnormalities while 23,000 per million suffered myocarditis.

This would mean 1 in 3.4 suffer new heart and cardiovascular conditions and abnormalities and 1 in 30 suffer myocarditis after getting covid19 vaccinations.

Due to the high number of adverse effects from the vaccines, the covid19 vaccines are more likely to cause a person to be hospitalized including being admitted to ICU than prevent them. These covid vaccines are not justified on the basis of hospitalizations and on the basis of adverse effects which could lead to hospitalizations.

Vast amounts of money are spent vaccinating tens of thousands or hundreds of thousands of people to stop just one hospitalization. These vaccines cost a lot of money and this has been borne by the Irish taxpayers. I further say that a Financial Cost Benefit analysis shows that the costs exceed the benefits. The cost of each vaccine was 19 euros per shot. 85% of the eligible population fully vaccinated in 2022 **12,557,744 vaccine doses given at a cost of 19 euros per shot. Total cost 238 million euros so far and rising. The evidence shows that this was and is a vast waste of public money.**

Sources: Ireland's COVID-19 Data Hub – Vaccinations". [Health Service Executive \(HSE\).](#) [Department of Health](#)

For example, the costs for the following age group are

40 – 49 Years, Autumn booster

No risk group, For one hospitalization 206,000. For serious hospitalization / ICU 932,500

$932,500 \times 19 \text{ euros} = 17.7 \text{ million euros}$

So 17.7 million euros must be spent on covid19 vaccinations to stop one hospitalization.

These is crazy policies by the Irish government and British government.

These mass covid vaccinations have added 238 million euros to the Irish national debt ; this is for vaccines which have been proven to be unsafe and ineffective and where many, many thousands of people have to be vaccinated to prevent one hospitalization. The costs of the vaccines far exceed the benefits of the vaccines in terms of hospitalizations and also in terms of adverse effects caused by these vaccines. This is misappropriation of public monies and waste of public monies and is criminal.

Additional Costs

The covid19 vaccines have imposed and are imposing additional costs on the Irish economy and taxpayer in terms of:

- (i)** new hospital admissions by those damaged by the covid vaccines leading to overcrowded hospital, the worst ever in Irish history in Winter 2022- 2023. Massive increase in healthcare and hospital costs and spending
- (ii)** loss to businesses and organizations from employees taking time off work due to covid vaccine damage and illnesses or disability caused by the vaccines
- (iii)** loss in tax revenues due to workers damaged by the covid vaccines

This adds hundreds of millions of euros or billions of euros to the Irish national debt as the costs of vaccine injuries, illnesses, disabilities and premature deaths adds up and continues to occur over time. This must also be factored into the Financial Cost Benefit analysis.

News report about this at

<https://childrenshealthdefense.org/defender/uk-data-john-campbell-covid-vaccine-risks-omicron/>

How does one explain this bizarre policy of wasting public monies, and approving, promoting and injecting these experimental, unsafe and ineffective vaccines into people where the costs far exceed the benefits ?

There are powerful vested interests including the big vaccine companies and scientists and “government advisors” who got massive grants or investments from these companies and Big Pharma, all of whom have a lot of power and leverage over politicians and government and they can bend politicians and governments to their will. This is NOT science, medicine, informed consent, medical ethics and scientific ethics, serving the public interest or serving the common good, but it’s got everything to do with politics , political manipulation and conflicts of interest. Should this be allowed to place the general public in danger and breach their rights to full and valid informed consent, and to bodily integrity, and breach their Fundamental rights under the Irish Constitution, and their statutory rights and common law rights under Irish law, their human rights under international human rights laws ? the answer is NO. Nobody is above the law, all are equal before the law according to the Irish Constitution including politicians and senior civil servants. The High Court and other courts have the power and the jurisdiction to make this clear in their verdicts and judgments.