

I say that in 2023 evidence has emerged that Pfizer and the EMA and HPRA breached the following EU laws by allowing pDNA and sv-40 to contaminate covid19 vaccines and contaminate those people injected with these vaccines and there was no Informed Consent for this by vaccine recipients and no application of the Precautionary Principle. Scientists have established that sv-40 causes certain types of cancers, and this makes it a public health hazard. Scientists believe that pDNA is harmful to humans and this is the subject of ongoing scientific research worldwide. I cite published scientific papers concerning this contamination of covid19 vaccines below:

DNA fragments detected in monovalent and bivalent Pfizer/BioNTech and Moderna modRNA COVID-19 vaccines from Ontario, Canada: Exploratory dose response relationship with serious adverse events.

Speicher et al. 2023

<https://osf.io/mjc97/>

and

Sequencing of bivalent Moderna and Pfizer mRNA vaccines reveals nanogram to microgram quantities of expression vector dsDNA per dose

McKernan et al. 2023

<https://osf.io/b9t7m/>

and

McKernan, K. (2023) Deep sequencing of the Moderna and Pfizer bivalent vaccines identifies contamination of expression vectors designed for plasmid amplification in bacteria.

McKernan, K. (2023) Pfizer and Moderna bivalent vaccines contain 20-35% expression vector and are transformation competent in E.coli.

McKernan, K. (2023) DNA contamination in 8 vials of Pfizer monovalent mRNA vaccines.

Analysis of these scientific findings and the harms caused by this contamination by scientists and medical doctors at the World Health Council at

<https://worldcouncilforhealth.org/multimedia/urgent-hearing-dna-contamination-mrna-vaccines/>

These scientists and medical doctors from the **World Health Council** will be asked to testify in our Supreme Court appeal in Ireland

and

Analysis of these scientific findings and the harms caused by this contamination by medical doctor, Dr. Joseph Mercola at

<https://www.theepochtimes.com/health/green-monkey-dna-found-in-covid-19-shots-5317587>

and

Analysis of these scientific findings and the harms caused by this contamination by Dr Ah Kahn Syed at

<https://arkmedic.substack.com/p/5-ways-to-skin-a-genetically-modified>

The vaccine vials exceeded the safety guidelines by orders of magnitude. Health Canada has recently confirmed the presence of sv-40 in the vaccines. The plasmid bioactive contaminant sequences were NOT pointed out to the regulatory authorities, the EMA and the HPRA (Ireland) in 2021 and these same regulatory authorities did not carry out their legal duty to test for this and establish vaccine safety, yet they claimed that the vaccines were “safe and effective” and they promoted them to the general public. And they are still promoting them in October 2023. The documents given to us, the Plaintiffs, by the HSE, the HPRA, the EMA and the Irish government prove that there was no Informed Consent for this and no application of the Precautionary Principle. This has endangered and/or harmed living men, women and children in Ireland and other countries.

Pfizer and the EMA and the HPRA (Ireland) and HSE have breached EU law. There is a breach of Good Manufacturing Practice and a breach of Commission Directive 2003/94/EC and (EU) 2017/1569 and (EU) 2017/1572. There are also breaches of EU law regarding medicines including Directive 2001/83/EC and Regulation (EC) No 726/2004 . When applying for marketing authorisation, companies must provide documentation showing that the product is of suitable quality. This is assessed in accordance with criteria set out in EU legislation such as Directive 2001/83/EC) and guidelines in EudraLex Volume 3 viewable at

https://health.ec.europa.eu/medicinal-products/eudralex/eudralex-volume-3_en

There are also significant breaches of EU laws and Irish laws regarding the Precautionary Principle and Informed and these are listed in our Book of Authorities for the Precautionary Principle and Book of Authorities for Informed Consent.

I further say that the breaches of EU law and Irish law relating to clinical trials of the covid19 vaccine by Pfizer are outlined in our Book of Authorities for Fraud. This is related to the aforementioned

vaccine defects above including contamination and breach of good manufacturing practice.

In law there are no legal protections for fraud and for breaking the criminal laws and for putting the lives of living men, women and children at risk and/or harming them. Pfizer is liable for the diseases, illnesses and deaths caused by any chemicals, toxins, or other harmful substances contained in their COVID-19 mRNA vials. And the EMA and HPRA and HSE have vicarious liability as they failed to test the vaccines for safety, yet publicly claimed they were safe. In addition to this, Pfizer, EMA and HPRA and HSE also share criminal and civil liability for the harms caused to living men, women and children by the spike proteins which resulted from these vaccinations. The scientific and medical evidence was presented to the High Court and is available to the Supreme Court.

These are strong grounds for supporting our Appeal to the Supreme Court for an Injunction and other remedies we seek from the Supreme Court. And there are strong grounds here for removing the covid19 vaccines from the market, and grounds for affected living men, women and children to bring criminal cases and civil cases to the courts.